

## NOTICE OF VIOLATION

Florida Power & Light Company  
St. Lucie 1

Docket Nos. 50-335  
License Nos. DPR-67

During an NRC inspection conducted on October 1 - November 5, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, as implemented by approved FPL Topical Quality Assurance Report, TQR 16.0 revision 8, "Corrective Action," requires that measures be established to assure that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, on August 29, 1994, the licensee's corrective action for a previous NRC violation were inadequate in that they failed to prevent operation of the unit with an electrical plant configuration for which Technical Specification required surveillance testing had not been performed. Specifically, the licensee was operating the 1C Intake Cooling Water (ICW) Pump powered from the 1A Emergency Diesel Generator (EDG) bus while relying on the 1A EDG to be operable. However, load shed testing of the 1C ICW Pump, while aligned to the 1A EDG bus, had not been performed as required by Technical Specifications (TSs) for EDG operability. The licensee had developed a Night Order to alert Unit 1 operators to the limitations of the subject electrical lineup. However, the Night Order failed to properly describe that the subject electrical lineup would result in the 1A EDG being inoperable.

This is a Severity Level IV Violation (Supplement I)

- B. Unit 1 TS 6.8.1.a requires that written procedures shall be established and implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, paragraph 1.h includes administrative procedures for log keeping. St. Lucie Administrative Procedure 0010120, revision 63, "Conduct of Operations," Appendix F, "Log Keeping," states that log entries are to be made in a chronological order and that, where this was not possible, entries are to be preceded by the words "Late Entry."

Contrary to the above, on August 29, 1994, certain control room log entries were not made in a chronological order and also were not preceded by the words "Late Entry". A Unit 1 Assistant Nuclear Plant Supervisor modified and appended Unit 1 control room log entries made on a previous shift, and the modifications were not annotated in any way. This created a false impression of the activities of the previous shift.

This is a Severity Level IV Violation (Supplement VII)

Pursuant to the provisions of 10 CFR 2.201, the Florida Power & Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this notice,

within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Atlanta, Georgia  
this 25th day of November 1994.