

PRIORITY 2

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 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in insp rept 50-335/94-22 per 10CFR2.201. Corrective actions: on 940830, normal electrical configuration established & 1A EDG declared operable.

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L-94-314
10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Re: St. Lucie Unit 1
Docket No. 50-335
Reply to Notice of Violation
Inspection Report 94-22

Florida Power and Light Company (FPL) has reviewed the subject inspection report and pursuant to 10 CFR 2.201 the response to the notice of violation is attached.

Very truly yours,

A handwritten signature in cursive script that reads 'J. H. Goldberg'.

J. H. Goldberg
President - Nuclear Division

JHG/DAS/JWH

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, USNRC Region II
Senior Resident Inspector, USNRC, St. Lucie Plant

9412280229 941220
PDR ADDCK 05000335
Q PDR

Handwritten initials 'JED' with a vertical line to the right.

VIOLATION 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 IC 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 IC 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.

RESPONSE A:

1. REASON FOR VIOLATION

The root cause for this violation was an inadequate technical review of the interim corrective action.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- A. On August 29, 1994, the 1A EDG was declared inoperable due to an electrical plant configuration for which Technical Specification (TS) required surveillance testing had not been performed.
- B. On August 30, 1994, the normal electrical configuration was established and the 1A EDG was declared operable.
- C. On August 31, 1994, a Night Order was issued which specified the 1C ICW and 1C CCW pumps should not be aligned to the A side electrically until the TS required surveillance was completed. If it was required to place the plant in this configuration, then the 1A EDG was to be declared inoperable.
- D. On September 28, 1994, engineering evaluation JPN-PSL-SEEP-94-051 concluded that the loading of the 1C ICW pump during the first (0 second) load block would not affect the ability of the EDG to perform its safety function and that all ESF loads would be able to start and accelerate. After the third (6 second) load block the EDG would recover to the originally analyzed loading conditions.

E. On November 30, 1994, all Technical Specification required testing associated with the Unit 1 electrical configuration in question was satisfactorily completed.

3. CORRECTIVE STEP TO AVOID FURTHER VIOLATIONS

QI 16-PR/PSL-2, "St. Lucie Action Report (STAR) Program," has been changed to require a technical subcommittee review of Technical Specification non-compliance issues to ensure an adequate technical review is conducted and presented to the Facility Review Group (FRG).

4. Full compliance was achieved on August 29, 1994 with the completion of Item 2A above.

VIOLATION 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.

RESPONSE B:

1. REASON FOR VIOLATION

The root cause for this violation was personnel error by Operations Department personnel. The individual failed to follow established plant procedures.

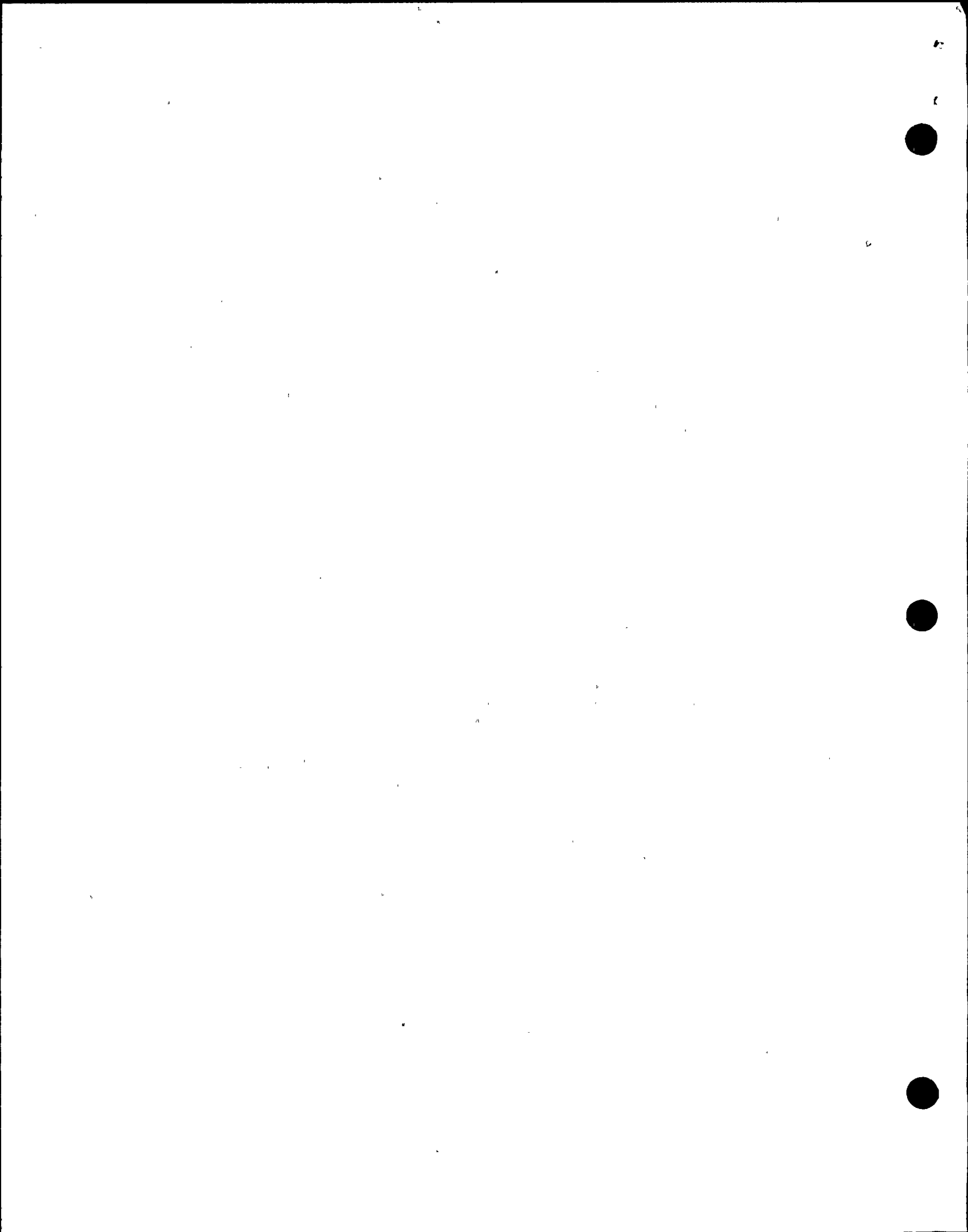
2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

The chronological control room log was amended to correct the time of occurrence of the entry described above.

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

A. The individual involved was counseled by Operations Management.

B. A Night Order was issued reiterating management's expectations regarding chronological log keeping.



St. Lucie Unit 1
Docket No. 50-335
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- C. St. Lucie Administrative Procedure 0010120, Revision 63, "Conduct of Operations," Appendix F, "Log Keeping," has been revised to incorporate the practice of leaving no blank lines between entries or after a shift's log is complete.
4. Full compliance was achieved on September 1, 1994 with the completion of Item 2 above.