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AUTH.NAME AUTHOR AFFILIATION
 GOLDBERG,J.H. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC ltr re violations noted in insp repts 50-335/94-24 & 50-389/94-24. Corrective actions: changes to QI 3-PR/PSL-1, QI 5-PR/PSL-1 & administrative procedure AP-0010432 implemented on 950111.

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L-95-008
10 CFR 2.201

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Reply to Notice of Violation
Inspection Report 94-24

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

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PDR ADOCK 05000335
Q PDR

Handwritten initials "JED" in a stylized, slanted font.

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VIOLATION:

Units 1 and 2 Technical Specification (TS) 6.8.2 requires that changes to procedures of TS 6.8.1.a shall be reviewed by the Facility Review Group (FRG) and approved by the Plant General Manager prior to use. Units 1 and 2 TS 6.8.3 states that temporary changes to procedures of TS 6.8.1.a may be made provided that the intent of the original procedure is not altered and that the change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license. TS 6.8.3 also requires that the temporary change is documented, reviewed by the FRG, and approved by the Plant General Manager within 14 days of implementation.

Units 1 and 2 TS 6.8.1.a requires that written procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, paragraph 9.a, includes maintenance that can affect the performance of safety-related equipment.

Procedure QI 5-PR/PSL-1: Preparation, Revision, Review/Approval of Procedures; Revision 58; paragraph 5.12; states that approved vendor technical manuals that contain sufficient detail and acceptance criteria may be used as procedures. It requires that technical manuals shall be treated as plant procedures for the purpose of procedure adherence. Also, it requires that changes to technical manuals received from the vendor shall be reviewed by the FRG and approved by the Plant General manager.

Contrary to the above, on April 12 - November 16, 1994, the licensee's process for making and using changes to vendor technical manuals was inadequate in that it failed to assure that, prior to implementation or use, changes to technical manuals were reviewed and approved as required by TS 6.8.2 and TS 6.8.3. Examples include:

1. Procedure QI 3-PR/PSL-1, Design Control, Revision 32, was inadequate in that it stated that a Documentation Change Request (DCR) for an administrative change to a technical manual, that does not require any physical work in the plant, does not require plant review and approval. As a result, on October 11, 1994, the Nuclear Engineering Department issued DCR #DCR-SLM-94-043 approving an April 12, 1994, vendor-recommended change to technical manual 8770-6251, Velan Valves. The DCR approved the change for use by the maintenance department without the prior plant review and approval that is required by TS 6.8.2 and 6.8.3. The change, in part, revised the required torque for the bonnet-to-body bolts for a safety-related valve such as 1-V-3660 from 130 ft. lbs. to 150 ft. lbs. On November 9, 1994, the licensee Document Control distributed that change to holders of controlled copies of the technical manual, including the maintenance department. On November 16, the copy of the change from Document Control was put into the maintenance department controlled copy of the technical manual. Throughout this process, the change was not reviewed and approved

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as required by TS 6.8.2 and TS 6.8.3.

2. Procedure QI 5-PR/PSL-1, Revision 58, was inadequate in that it did not require that, prior to implementation or use, changes to technical manuals shall be reviewed approved as required by TS 6.8.2 and TS 6.8.3. As a result, on or before September 12, 1994 (prior to the Nuclear Engineering Department approval) and again on November 16, 1994 (after the Nuclear Engineering Department approval), the above change was put into the maintenance department controlled copy of the technical manual. On September 12, 1994, the maintenance department used the change in writing Plant work Order (PWO) 61/0148. The PWO required disassembly and reassembly of Unit 1 safety-related valve 1-V-3660 per the technical manual and also specifically required that the bonnet-to-body bolts be torqued to 150 ft. lbs. On November 15, 1994, maintenance personnel torqued the valve bonnet-to-body bolts to 150 ft. lbs. per the PWO. The technical manual change was not reviewed and approved as required by TS 6.8.1 and 6.8.3 prior to torquing the bolts to 150 ft. lbs. Valve 1-V-3660, low pressure safety injection and high pressure safety injection pumps' recirculation to the refueling water tank, is safety-related and receives an automatic signal to close during an accident on a Recirculation Actuation Signal.
3. Administrative Procedure 0010432, Nuclear Plant Work Orders, Revision 72, was inadequate in that it permitted maintenance personnel to deviate from a Plant General Manager approved technical manual without prior approval as required by TS 6.8.2 and 6.8.3. Procedure step 8.7.3 allowed deviation from a technical manual (when it "is not invoked, but only used as a reference") with only a concurrence from a vendor or a maintenance engineer prior to returning the affected equipment to service.

RESPONSE:

1. REASON FOR VIOLATION

The reason for the subject violation is inadequate procedures. These procedures instituted a process which permitted the use of changes to vendor technical manuals without receiving prior FRG committee review and Plant General Manager approval.

2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

Changes to QI 3-PR/PSL-1, "Preparation, Revision, Review/ Approval of Procedures," QI 5-PR/PSL-1, "Design Control" and Administrative Procedure AP-0010432, "Nuclear Plant Work Orders" were implemented on January 11, 1995 to ensure prior FRG review and Plant General Manager approval of changes to vendor technical manuals prior to implementation or use.

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3. CORRECTIVE STEP TO AVOID FURTHER VIOLATIONS

- A. Maintenance job planning and supervisory personnel have been trained on the changes to QI 3-PR/PSL-1, QI 5-PR/PSL-1 and Administrative Procedure AP-0010432.
 - B. The Plant General Manager has issued a letter to all department heads setting the management expectation for the use of vendor technical manuals.
4. Full compliance was achieved on January 11, 1995 with the completion of actions listed in item 2 above.