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DOCKET #
05000389

SUBJECT: Forwards response to violations noted in Insp Rept
50-389/95-05. Corrective actions: electrical maint replaced
thermal overload heaters in 2A5 MCC w/Model 123F114C & 2AA
battery charger returned to svc on 950428.

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JUN 27 1995

L-95-191
10 CFR 2.201

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

Re: St. Lucie Unit 2
Docket Nos. 50-389
Reply to Notice of Violation
Inspection Report 95-05

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/EJB

Attachment

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

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VIOLATION:

10 CFR 50, Appendix B, Criterion III, as implemented by Florida Power and Light (FP&L) Topical Quality Assurance Report (FPLTQAR 1-76A), Revision 38, requires, in part, design control measures which assure the suitability of application of materials and parts that are essential to the safety-related functions of the structures, systems, and components.

Plant change and modification (PC/M) package 039-294, required that overload heaters with the model number 123F114C be installed in motor control center (MCC) 2A5, Compartment No. DR3, for Battery Charger 2AA.

Contrary to the above, as of April 26, 1995, design control measures did not assure that the required overload heaters were installed in that, overload heaters with the model number 123F104C were installed in MCC 2A5, Compartment No. DR3 for Battery Charger 2AA instead of the required model number 123F114C. The installed overload heaters were less conservative than the model number required by the PC/M.

RESPONSE:

1. REASON FOR VIOLATION

The root cause of this event was that process controls which were in place governing the issuance and installation of safety-related components failed to ensure that design requirements were correctly implemented as specified by the PC/M.

A Procurement Engineering generic evaluation performed in 1991 contained an unclear disposition of material in stock, resulting in two different overload heater models being stored under the same Material and Stock (M&S) identification number. Generic evaluations of this type were performed only during 1991 and 1992.

Electrical Maintenance personnel failed to adequately resolve a discrepancy between the parts issued from stock and those specified by the work order and PC/M.

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2. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- A. Operations declared the 2AA Battery Charger out of service on April 27, 1995.
- B. Electrical Maintenance replaced the thermal overload heaters in the 2A5 MCC with model number 123F114C, and the 2AA Battery Charger was returned to service on April 28, 1995.
- C. A St. Lucie Action Report (STAR) was issued which evaluated the past operability of the 2AA Battery Charger. This evaluation concluded that the 2AA Battery Charger was capable of performing its intended function during the time the thermal overload heaters (model 123F104C) were installed.
- D. The Engineering Department reviewed all other procurement generic evaluations performed during 1991 and 1992 to verify the accuracy of material descriptions. No additional discrepancies were found to exist between material in stock and the item descriptions addressed by those generic evaluations.

3. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

- A. The Maintenance Department will revise AP-0010432, "Nuclear Plant Work Orders Administrative Procedure" to include additional verification that components installed in the performance of a PC/M match the design requirement as specified. This action will be completed by July 31, 1995.
- B. The Procurement Engineering generic evaluation process has been changed so that specific Material and Stock (M&S) identification numbers are no longer referenced in generic procurement evaluations.
- C. Engineering conducted training for Procurement Engineering personnel to emphasize the importance of providing clear instructions in evaluations regarding the disposition of instock material.

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- D. Nuclear Materials Management will develop instructions for performing part number verifications on future instock dispositions resulting from Engineering evaluations. This action will be completed by October 1, 1995.
 - E. This event will be included into the quarterly operating events training program for maintenance disciplines. This action will be completed by December 31, 1995.
 - F. A technical review team was formed to further examine the material control process and provide recommendations for improvement. Team recommendations to management will be provided by August 31, 1995.
4. Full compliance was achieved on April 28, 1995 with the completion of item 2B above.

