

NOTICE OF VIOLATION

Florida Power & Light Company
St. Lucie 1 and 2

Docket Nos. 50-335 and 50-389
License Nos. DPR-67 and NPF-16

During an NRC inspection conducted on September 17 through October 28, 1995, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violations are listed below:

- A. Technical Specification 6.8.1.a required that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev 2, February 1978. Appendix A, paragraph 1.d includes administrative procedures for procedural adherence. Procedure QI 5-PR/PSL-1, Rev 62, "Preparation, Revision, Review/Approval of Procedures," Section 5.13.2, stated that all procedures shall be strictly adhered to.

Contrary to the above, procedures were not adhered to strictly in the following examples:

1. AP 1-0010123, Rev 99, "Administrative Controls of Valves, Locks, and Switches," required: that "All valve or switch position deviations or lock openings shall be documented in Appendix C Valve Switch Deviation Log...". [step 8.1.6]; that "The NPS/ANPS/NWE shall ensure that the verification of the status of all valves, locks and switches under Administrative Control is performed at the required intervals specified in AP 1-0010125...[step 8.3.1] which "Verifies that log entries are current and valid". [step 8.3.2.3]; and that "A log of keys issued shall be maintained by the ANPS for the Controlled Key Locker...Appendix B, Rack Key Log"... [step 8.2.2].

On September 30, 1995, during a Steam Generator draining evolution on St. Lucie Unit 1, operators failed to make an Appendix B log entry when the AFAS AB BYPASS SWITCH (Key #21) was issued and returned. Further, the NPS/ANPS/NWE verification of the status of the AFAS AB BYPASS SWITCH Appendix C log entry performed on the midnight shifts of October 1 through October 3, 1995, failed to verify that the log entry was current or valid.

2. AP 2-0010123, Rev 68, "Administrative Controls of Valves, Locks, and Switches," required: that "All valve or switch position deviations or lock openings shall be documented in Appendix C Valve Switch Deviation Log...". [step 8.1.6]; and that "The NPS/ANPS/NWE shall ensure that the verification of the status of all valves, locks and switches under Administrative Control is performed at the required intervals specified in AP 1-0010125...[step 8.3.1] which "Verifies that log entries are current and valid"...[step 8.3.2.3].

OP 2-0400050, Rev 16, "Periodic Test of the Engineered Safety Features," required that "The following logs will be reviewed prior to the performance of applicable test sections...The Valve Switch Deviation Log." [step 5.3.1]

Contrary to the above, on October 7, 1995, during troubleshooting of AFAS Channel D on St. Lucie Unit 2, operators failed to make the appropriate Appendix C log entries when the AFAS CABINET DOOR (Key #202) was restored at 2:00 PM. or when the AFAS CABINET DOOR was reopened and restored at 2:35 PM and 4:10 PM, respectively. Further, the NPS/ANPS/NWE verification of the status of the AFAS CABINET DOOR performed on the midnight shifts of October 8 through October 10, 1995, failed to verify that the Appendix C log entry for the AFAS CABINET DOOR was current or valid.

This is a Severity Level IV violation (Supplement I).

- B. Technical Specification 6.8.1.a required that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Rev 2, February 1978. Appendix A, paragraph 1.c includes administrative procedures for equipment control. Procedure QI 14-PR/PSL-1, Rev 25, "Inspection's, Test and Operating Status," Section 5.5, stated that equipment clearance tags be attached to the isolating switch fuse or valve according to OP 0010122, Rev 59, "In-Plant Equipment Clearance Orders." Step 4.1 requires that a clearance shall be required when operation of equipment could create a hazard to personnel or equipment.

Contrary to the above on September 15, 1995, during the cleaning of Unit 2 condenser water boxes, the 2B2 waterbox manway was removed to replace a leaking gasket without implementing a clearance. When the maintenance foreman and mechanic attempted to remove the manway cover, the negative pressure that existed across the manway sucked the cover back on the waterbox and severed a portion of the mechanics finger.

This is a Severity Level IV violation (Supplement I).

- C. 10 CFR 50 Appendix B Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants required, in part:
- that "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in § 50.2 and as specified in the license application, for those systems, structures and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions." ... "The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program." [III DESIGN CONTROL]
 - that "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed ..." [XI TEST CONTROL]

Contrary to the above, the licensee implemented a Unit 2 Emergency Diesel Generator (EDG) control logic design that did not trip the EDG output breaker on receipt of a CSAS or CIAS signal when paralleled with offsite power. This inadequate design resulted in shifting the governor to the isochronous mode, bypassing all protective relays except overspeed and differential current during integrated safeguards testing on October 12, 1995. This resulted in operating the EDG as a synchronous motor for approximately 45 seconds until the CIAS signal was reset. Operation in the isochronous mode while paralleled with offsite power could expose the engine and generator to excessive mechanical stress or electrical overcurrent conditions.

This is a Severity Level IV violation (Supplement I).

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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a 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.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without reduction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 27th day of November 19 95.