

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9608190273 DOC. DATE: 96/08/07 NOTARIZED: NO DOCKET #
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in insp rept 50-335/96-08 & 50-389/96-08.C/A: investigated proposed violation & denies denies violation.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT		COPIES		RECIPIENT	COPIES	
	ID CODE/NAME		LTR	ENCL		ID CODE/NAME	LTR
	PD2-3	PD	1	1	WIENS, L.	1	1
INTERNAL:	ACRS		2	2	AEOD/SPD/RAB	1	1
	AEOD/TTC		1	1	DEDRO	1	1
	<u>FILE CENTER</u>		1	1	NRR/DISP/PIPB	1	1
	NRR/DRCH/HHFB		1	1	NRR/DRPM/PECB	1	1
	NRR/DRPM/PERB		1	1	NUDOCS-ABSTRACT	1	1
	OE DIR		1	1	OGC/HDS3	1	1
	RGN2	FILE 01	1	1			
EXTERNAL:	LITCO BRYCE, J H		1	1	NOAC	1	1
	NRC PDR		1	1			

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 19 ENCL 19

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T



FPL

August 7, 1996

L-96-197
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 a Notice of Violation
NRC Inspection Report No. 96-08

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.

The Notice of Violation addresses the NRC's observed failure by an operator to record cooling water outlet temperature every thirty minutes during a surveillance test of the 1B Emergency Diesel Generator (EDG) as required by St. Lucie Unit 1 Operating Procedure OP-2200050B.

On receipt of the subject inspection report, Florida Power & Light Company investigated the proposed violation and has concluded that the NRC may not have been aware of certain factual information when the inspection report was written. Accordingly, and as discussed with the NRC's Region II staff, FPL denies the proposed violation. Attached is clarifying information related to the occurrence cited in the inspection report and the reasons for FPL's denial of the violation.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'T. F. Plunkett'.

T. F. Plunkett
President
Nuclear Division

TFP/JAS/EJW

Attachment

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

190055

9608190273 960807
PDR ADOCK 05000335
G PDR

VIOLATION:

During an NRC inspection conducted on May 12 through June 8, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

- A. Technical Specification 6.8.1.a requires 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. QI 5-PR/PSL-1, Rev 68, "Preparation, Revision, Review/Approval of Procedures," Section 5.13.1, states that all procedures shall be strictly adhered to.

Step 8.1.28 of procedure OP 1-2200050B, Rev 26, "1B Emergency Diesel Generator Periodic Test and General Operating Instructions" requires the licensee to "complete data sheet 2 after diesel generator reaches full load and every 30 minutes thereafter". Data sheet 2 identified the cooling water outlet temperature as one of the parameters that should be taken.

Contrary to the above, on June 6, 1996, the licensee failed to record cooling water outlet temperature every thirty minutes as required by OP-2200050B. Full load conditions were reached at 5:30 a.m. on June 6, 1996. Operators began taking the readings at 10:30 a.m. after this failure to follow OP-2200050B was identified by the NRC.

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

RESPONSE:

1. FPL denies the violation, as cited. The basis for denying the violation is discussed in item 2, below.



2. Basis for Denying the Violation

Requirements

As discussed in NRC Inspection Report No. 50-335/96-08, Step 8.1.28 of OP 1-2200050B, *1B Emergency Diesel Generator Periodic Test And General Operating Instructions*, requires the cooling water outlet temperatures be recorded every 30 minutes after the diesel generator reaches full load conditions. Technical Specification 6.8.1.a requires 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. St. Lucie Plant Quality Instruction QI 5-PR/PSL-1, Revision 68, *Preparation, Revision, Review/Approval of Procedures*, Section 5.13.1, states that all procedures shall be strictly followed.

St. Lucie Plant Administrative Procedure (AP) No. 0010120, *Conduct of Operations*, Revision 83, states, in Appendix D:

Log entries shall be verified to be within the minimum and maximum acceptance values for the parameter. An explanation shall be recorded for entries that exceed the minimum or maximum acceptance values.

Discussion

The 24 hour periodic surveillance test of the 1B Emergency Diesel Generator (EDG) was being performed per OP 1-2200050B. The test was begun at about 0530 on June 6, 1996, and the full electrical loading condition was reached shortly thereafter. Instrument TI-59-015B was inoperable at the start of the 1B EDG surveillance test. Upon being notified by the Senior Nuclear Plant Operator (SNPO) that instrument TI-59-015B was inoperable, the St. Lucie Unit 1 Assistant Nuclear Plant Supervisor (ANPS) decided to continue the surveillance test without the readings from instrument TI-59-015B and generated a nuclear plant work order (NPWO) to replace the gage. The decision to continue the surveillance test without the data from instrument TI-59-015B was made with the acknowledgment that not having the data from that instrument would not, by itself, render the 1B EDG 24 hour surveillance test unsatisfactory.

Upon recording the half-hourly log readings for the 1B EDG, the SNPO responsible for these log readings properly annotated, on *Data Sheet 2 1B Diesel And Generator* of OP No. 1-2200050B, that gage TI-59-015B was broken and that a plant work order had been

written. Half-hourly log readings were consistently annotated as such, as required by AP No. 0010120, until an alternate instrument for recording data point *Cooling Water Outlet Temperature 'F* was identified to the SNPO by the Unit 1 control room at 1030 on June 6, 1996. An alternate data point was recorded, and indicated as such on Data Sheet 2, for the balance of the 24 hour surveillance test.

Summary

FPL concludes that:

- 1) Data Sheet 2 of procedure OP 1-2200050B identifies the cooling water outlet temperature from instrument TI-59-015B as one of the parameters required to be recorded during the conduct of OP 1-2200050B.
- 2) The SNPO did not record cooling water outlet temperature every thirty minutes as required by OP 1-2200050B. However, since the parameter was outside of its minimum/maximum acceptance value, the SNPO properly provided an explanation at each half-hourly reading on Data Sheet 2 of OP 1-2200050B for not recording the reading, in accordance with the requirements of Appendix D of AP No. 0010120.
- 3) An alternate instrument for recording data point *Cooling Water Outlet Temperature 'F* was identified to the SNPO by the Unit 1 control room at 1030 on June 6, 1996. An alternate data point was recorded, and indicated as such on Data Sheet 2, for the balance of the 24 hour surveillance test.

FPL has concluded that the SNPO did not violate the requirements of Technical Specification 6.8.1.a, QI 5-PR/PSL-1, or OP No. 1-2200050B.