

NOTICE OF VIOLATION

Florida Power and Light Company
St. Lucie Nuclear Plant

Docket Nos. 50-335, 50-389
License Nos. DPR-67, NPF-16
EA 96-236 and 96-249

During an NRC inspection completed on July 12, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- I. 10 CFR 50.59, "Changes, Tests and Experiments," provides, in part, that the licensee may make changes in the facility as described in the Safety Analysis Report (SAR) without prior Commission approval, unless the proposed change involves an unreviewed safety question. A proposed change shall be deemed to involve an unreviewed safety question if the probability of occurrence of a malfunction of equipment important to safety previously evaluated in the SAR may be increased, if a possibility for an accident or malfunction of a different type than any evaluated previously in the SAR may be created, or if the margin of safety as defined in the basis for any technical specification is reduced.

Contrary to the above, in July 1995, the licensee made a change to the facility which involved an unreviewed safety question without prior Commission approval. Specifically, the 2B Emergency Diesel Generator (EDG) fuel oil line was manually isolated to secure a through-wall fuel oil leak. In taking this action, the licensee introduced two new failure modes for the 2B EDG, which both increased the probability of occurrence of a malfunction of the EDG above that previously evaluated in the SAR and the possibility for malfunction of a different type than any evaluated previously in the SAR, resulting in an unreviewed safety question. (01013)

This is a Severity Level III violation (Supplement I)

- II. 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." Criterion III requires, in part, that measures be established to assure that applicable regulatory requirements and the design basis for safety-related structures, systems, and components are correctly translated into specifications, drawings, procedures, and instructions.

Florida Power and Light Company Topical Quality Assurance Report, TOR 3.0, Revision 11 implements these requirements. Section 3.2, "Design Change Control," provides, in part, that design changes shall be reviewed to ensure their implementation is in each case, coordinated with any necessary changes to operating procedures. In addition, Section 3.2.4, "Design Verification," provides, in part, that design control measures shall be established to verify the design inputs, design process, and that the design inputs are correctly incorporated into the design output.

- A. Contrary to the above, the licensee failed to coordinate design changes with the necessary changes to operating procedures as evidenced by the following examples:
1. Plant Change/Modification (PC/M) 109-294, "Setpoint Change to the Hydrazine Low Level Alarm (LIS-07-9)," was completed on January 6, 1995, without ensuring that affected Procedure ONOP 2-0030121, "Plant Annunciator Summary," was revised. This resulted in Annunciator S-10, "HYDRAZINE TK LEVEL LO," showing an incorrect setpoint of 35.5 inches in the procedure.
 2. PC/M 268-292, "Intake Cooling Water Lube Water Piping Removal and Circulatory Water Lube Water Piping Renovation," was completed on February 14, 1994, without ensuring that affected Procedure ONOP 2-0020131, "Plant Annunciator Summary," was revised. This resulted in the instructions for Annunciator E-16, "CIRC WTR PP LUBE SPLY BACKUP IN SERVICE," incorrectly requiring operators to verify the position of valves MV 21-4A and 4B following a safety injection actuation system signal to ensure they were de-energized and had no control room position indication.
 3. PC/M 275-290, "Flow Indicator/Switch Low Flow Alarm and Manual Annunciator Deletions," was completed on October 28, 1992, without ensuring that affected Procedure ONOP 2-0030131, "Plant Annunciator Summary," was revised. This resulted in the instructions for safety-related Annunciators LA-12, "ATM STM DUMP MV-08-18A/18B OVERLOAD/SS ISOL," and LB-12, "ATM STM DMP MV-08-19A/19B OVERLOAD/SS ISOL," incorrectly requiring operators to check Auto/Manual switch or switches for the manual position. (02014)

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

- B. Contrary to the above, the licensee failed to assure that the design of the Circulating and Intake Cooling Water System was correctly translated into plant drawings. Specifically, during implementation of PC/M 341-192, "Intake Cooling Water Lube Water Piping Removal and Circulatory Water Lube Water Piping Renovation," the as-built Drawing No. JPN-241-192-008 was not incorporated into Drawing No. 8770-G-082, "Flow Diagram Circulating and Intake Cooling Water System," Revision 11, Sheet 2, issued May 9, 1995, for PC/M 341-192. This resulted in Drawing No. 8770-G-082 erroneously showing valves 1-FCV-21-3A and 3B and associated piping as still installed. (03014)

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

Pursuant to the provisions of 10 CFR 2.201, 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.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

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 redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 19th day of September 1996



Florida Power & Light Company

Distribution w/encl:

PUBLIC

EJulian, SECY

BKeeling, CA

JTaylor, EDO

JMilhoan, DEDR

RZimmerman, NRR

SEbnetter, RII

LChandler, OGC

JGoldberg, OGC

JLieberman, OE

Enforcement Coordinators

RI, RIII, RIV

EHayden, OPA

EJordan, AEOD

PRabideau, OC

DDandois, OC

GCaputo, OI

HBell, OIG

OE:EA File (B. Summers, OE) (2 letterhead)

MSatorius, OE

AGibson, RII

JJohnson, RII

CEvans, RII

BUryc, RII

KClark, RII

RTrojanowski, RII

CCasto, RII

KLandis, RII

JNorris, NRR

ABoland, RII

NRC Resident Inspector
U.S. Nuclear Regulatory Comm.
7585 South Highway A1A
Jensen Beach, FL 34957-2010

Florida Power & Light Company

To: Anne
From: Dawn

Distribution w/encl:

- PUBLIC
- EJulian, SECY
- BKeeling, CA
- JTaylor, EDO
- JMilhoan, DEDR
- RZimmerman, NRR
- SEbnetor, RII
- LChandler, OGC
- JGoldberg, OGC
- JLieberman, OE
- Enforcement Coordinators
- RI, RIII, RIV
- EHayden, OPA
- EJordan, AEOD
- PRabideau, OC
- DDandois, OC
- GCaputo, OI
- HBell, OIG
- OE; EA File (B. Summers, OE) (2 letterhead)
- MSatorius, OE
- AGibson, RII
- JJohnson, RII
- CEvans, RII
- BURyc, RII
- KClark, RII
- RTrojanowski, RII
- CCasto, RII
- Klandis, RII
- JMorris, NRR
- ABoland, RII

NRC Resident Inspector
U.S. Nuclear Regulatory Comm.
7585 South Highway A1A
Jensen Beach, FL 34957-2010

*Hand for R. Zimmerman
per L. Whelan*
*Hand for S. Electric
per Bruce Weger*

OE <i>me</i>	NRR	RII <i>me</i>	OE <i>H</i>	EDR <i>H</i>
MSatorius	RZimmerman	SEbnetor	JLieberman	JMilhoan
09/9/96	09/9/96	09/10/96	09/10/96	09/11/96

