

CATEGORY 1

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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 NRC 960927 ltr re violations noted in insp repts
50-335/96-11 & 50-389/96-11. Changes were made to applicable
plant preventive maintenance & surveillance testing
procedures to discontinue practice of lubricating.

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SEP 27 1996

L-96-234
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 No. 50-335 and 50-389
Reply to a Notice of Violation
Inspection Report 96-11 (EA 96-260)

Florida Power and Light Company 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, appearing to read 'T. F. Plunkett', is written over a horizontal line.

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

960107

IEZ1/1

9610080101 960927
PDR ADOCK 05000335
G PDR

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Violation Citation

During an NRC inspection conducted on July 7 through August 3, 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. 10 CFR 50, Appendix B, Criterion XI, requires, in part, that a test program shall be established to assure that all testing required to demonstrate that systems and components will perform satisfactorily in service is identified and performed in accordance with written test procedures. Test procedures shall include provisions for assuring that the test is performed under suitable environmental conditions.

Contrary to the above, Administrative Procedures, AP-1-0010125A, revision 39, for Unit 1 and AP-2-0010125A, revision 43, for Unit 2, did not ensure that the procedures were performed under suitable environmental conditions. Specifically, the two aforementioned procedures directed that valves 1-FCV-07-1A, 1-FCV-07-1B, 2-FCV-07-1A, and 2-FCV-07-1B be lubricated prior to being tested. This practice negated the ability to assess the operational readiness of the valves.

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

Violation Response

1. FPL concurs with the violation
2. Reason for the Violation

The root cause of the violation was incorrect procedural direction to plant personnel in the sequencing of preventive maintenance and surveillance testing. Specifically, post-preventive maintenance surveillance testing did not permit the proper assessment of the as-found condition of the valves. The following were contributing factors to the violation: 1) There was a lack of understanding and appreciation by plant personnel that the practice of pre-lubrication resulted in the valves being surveilled under other than suitable, or "as found," conditions; and, 2) There were inadequate management controls in the maintenance planning and scheduling processes to assure that the sequencing of maintenance and testing activities was appropriate for these valves.

3. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

Changes were made to the applicable plant preventive maintenance and surveillance testing procedures to discontinue the practice of lubricating the valves prior to surveillance testing. The procedural changes require that lubrication not be performed if the surveillance test has not been performed. This action was completed by December 7, 1995.

4. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

- A. St. Lucie Plant problem reports (STARs 951063 and 960127) were written to review other plant preventive maintenance procedures to determine if similar preconditioning procedural allowances existed elsewhere. Components associated with the 1C and 2C Auxiliary Feedwater pumps, St. Lucie Unit 2 emergency core cooling system (ECCS) ventilation dampers, and St. Lucie Unit 1 control room ventilation dampers, were identified as potentially being subject to surveillance test preconditioning. Changes were made to these components' preventive maintenance procedures to prohibit this practice prior to surveillance testing. This action was completed on March 25, 1996.
- B. The St. Lucie Plant General Manager has issued a memorandum, dated September 18, 1996, to the Operations Supervisor, Engineering Manager, and Work Controls Group Manager stating that preconditioning a component prior to performing a surveillance test violates the Federal regulations and is an unacceptable practice. The managers were instructed to be aware of the violation and alert for other conditions and tests which may result in preconditioning components. In addition, precautions related to component preconditioning will be incorporated into appropriate St. Lucie Plant Operating and Maintenance Procedures. This action will be completed by October 25, 1996.
- C. St. Lucie Plant has recently implemented a 13 week rolling maintenance program. In this program, preventive maintenance, surveillance, and testing are planned weeks in advance of the activity. An important feature of this program is the up-front review and coordination of all maintenance prior to work being authorized via the Plan of the Day (POD). This pre-planning according to applicable guidance will ensure that the improper sequencing of work is not performed since the only authorized plant work is that accomplished in

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accordance with the POD, with the exception of unplanned Limiting Condition for Operation (LCO) ACTION statement entries requiring immediate attention.

5. Full compliance was achieved on December 7, 1995, with the completion of item 3, above.

