NOTICE OF VIOLATION EA 97-107

Florida Power and Light Company
St. Lucie Nuclear Plant
Units 1 and 2

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

During the NRC inspections conducted during the period of January 5 through February 15, 1997, 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:

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, Revision 2, February, 1978. Appendix A, paragraph 1.d includes administrative procedures for procedural adherence. Procedure QI 5-PR/PSL-1, Revision 75, "Preparation, Revision, Review/Approval of Procedures," section 5.14.1 requires verbatim compliance to procedures by all personnel.

Operating Procedure 0010122, Revision 66, "In-Plant Equipment Clearance Orders," states the following:

Step 8.9.C, "Verify boundary using controlled documents (i.e., prints, procedures):"

Step 8.12.7, "The Clearance Order execution shall be stopped and the WCG/Control Room shall be notified immediately for...(A) Any step that cannot be executed as specified."

Step 8.12.12, "Independent Verification of the Clearance Order steps shall be performed ... in accordance with ADM-17-06 ..." Administrative Procedure 17-06, Revision 2, "Independent Verification," step 7.7.2 states "The second person Independently Verifies that the proper lead has been correctly identified and tagged."

Step 8.12.20, "The Clearance Controller shall document their satisfaction with the clearance boundary by: ... Signing the acceptance block on the Clearance Order Form (Figure 1) concurring that the clearance boundary is adequate for the work to be performed."

Contrary to the above as of February 7, 1997,

1. The requested boundary for Equipment Clearance Order 1-97-01-093 could not be verified using Engineering Drawing 8770-B-327, Revision 2, "Heated Junction Thermocouples 1B, 2B, 3B, & 4B," sheet 1582.

2. The operator hanging Tags #2 and #3 of ECO 1-97-01-093 failed to recognize that the identification numbers of the lifted leads did not agree with the Clearance Order identification and, thus, did not stop.

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3. A second operator performing the Independent Verification on Tags #2 and #3 of ECO 1-97-01-093 failed to recognize that the identification numbers of the lifted leads did not agree with the Clearance Order identification.

4. The Clearance Controller failed to recognize that the clearance boundary did not agree with that requested in November 1996.

This is a Severity Level IV violation (Supplement I) applicable to Unit 1 only.

B. Technical Specification 6.8.4.e requires, in part, establishing, implementing and maintaining a post-accident sampling "program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

(i) Training of personnel,
(ii) Procedures for sampling and analysis, and
(iii) Provisions for maintenance of sampling and analysis equipment."

Contrary to the above, a program to ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions was not established, implemented, and maintained in a manner sufficient to satisfy the Technical Specification requirements, as evidenced by the following examples:

- The failure to require adequate post maintenance testing (i.e operability testing) following completion of Unit 2 Post Accident Sampling System work on August 26, 1996.

- The failure to take timely and appropriate corrective actions from November 26, 1996, to February 10, 1997, after recognizing that the Unit 2 Post Accident Sampling System was INOPERABLE, resulting in a period of inoperability in excess of two months.

- The failure to identify and perform required calibrations of installed Unit 2 Post Accident Sampling System instrumentation; specifically, the Panalarm and the pressure setpoint for PIA-503, as described in Unit 2 UFSAR Table 9.3-10d, Instrument Calibration Frequency," and PASS C.E. Technical Manual 2998-13315, Volume 2, Table VI-1.

- The failure to maintain consistency between the boron meter range described in Unit 2 UFSAR Table 9.3-10C (0-500 ppm), the installed

field equipment (0-5000 ppm), and that referred to in Chemistry Procedure 2-COP-65.82, Revision 2, "Performing an Operability Test on the Unit 2 Post Accident Sampling System (PASS)," (at least 1000 ppm).

- The failure to maintain consistency between both units' Post Accident Sampling System panel mimics and their respective mimic and flow drawings.

- The failure to maintain indicating lights on Unit 2 Post Accident Sampling System valve position indicators which, in the case of V5743, masked the fact that the valve was out of its required position.

- The failure to update the Unit 1 Post Accident Sampling System vendor technical manual to either include or reference a current flow diagram.

- The failure to control operator aids, such that an operator aid associated with Unit 2 Post Accident Sampling System panel valve V5747 provided incorrect information on the flowpaths through the valve.

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

C. Section 70.24(a) of Title 10 of the *Code of Federal Regulations*, requires, in part, each licensee authorized to possess special nuclear material in a quantity exceeding those identified, to maintain a radiation monitoring system in each area where special nuclear material is handled, used, or stored that will alarm if accidental criticality occurs. Furthermore, applicable emergency procedures must be maintained to ensure personnel are withdrawn to an area of safety when the alarm sounds.

Contrary to the above, as of February 15, 1997, the licensee never installed a radiation monitoring system in either St.Lucie unit's new fuel storage areas capable of alarming should accidental criticality occur. Furthermore, the licensee's initial exemptions from the requirements of 10 CFR 70.24(a) (contained as part of its original NRC Materials License for possessing special nuclear material) expired when the St. Lucie Units 1 and 2 construction permits were converted to operating licenses in 1976 (Unit 1) and 1983 (Unit 2). At that time the licensee failed to install a radiation monitoring system and implement appropriate emergency procedures, or renew its exemptions. Since then, new fuel storage areas have been used to handle, use, and store new fuel assemblies on a regular basis prior to each unit refueling outage.

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 redaction. 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 17th day of March 1997