

CATEGORY 1

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50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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SUBJECT: Forwards response to violations noted in insp repts
50-335/97-05 & 50-389/97-05. Corrective actions: Unit 2 ECCS
sump insp completed on 970522 & general cleanliness
verifications of containment bldg required documented.

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August 11, 1997

L-97-206
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 Integrated Inspection Report 97-05

Florida Power and Light Company (FPL) has reviewed the subject Notice of Violation and, pursuant to 10 CFR §2.201, the responses to the violations are attached.

As you have indicated in the cover letter to the inspection report, these violations resulted from procedural compliance shortcomings at the St. Lucie plant. We are continuing to emphasize our policy of strict procedure adherence. Recent condition report data indicates that, while we are not where we want to be, improvements in overall adherence to procedures is evident.

Additionally, we are fully committed to continuing to upgrade our existing procedures to ensure that the tools provided to our employees to accomplish work are the best they can be. We are confident that the actions currently underway will continue to show progress in this area, and we will keep you informed at our periodic status meetings.

Please contact us with questions on the enclosed violation responses.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas F. Plunkett".

Thomas F. Plunkett
President
Nuclear Division

TFP/JAS/EJW

Attachment

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

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PDR ADOCK 05000335
G PDR



Violation A

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures. Procedure QI 13-PR/PSL-2, Revision 29, "Housekeeping and Cleanliness Control Methods," implements this requirement with regard to Foreign Material Exclusion (FME) control. Appendix B of this QI states in part that "FME control areas, as defined by QI 13-PR/PSL-2, are used in those situations where it is not feasible/practical to install an FME control device to prevent loss of foreign material into a system/component. Tools/materials which are taken into FME control areas are logged for accountability." In addition, Section 5.15, "General Housekeeping", step 11.A, states that, "Material accountability shall be applied when misplaced tools equipment, and other materials could be detrimental to the plant item involved. When material accountability is applied, tools and other materials shall be logged into and out of the area."

Contrary to the above, from May 19, 1997 until May 25, 1997, tools/materials entered and exited the Unit 2 Containment building without being properly logged for accountability, although the area was identified as a Foreign Material Exclusion area.

This is a Severity Level IV violation (Supplement I) applicable to Unit 2.

Response A

1. FPL concurs with the violation.
2. REASON FOR VIOLATION

The reason for the violation is procedural noncompliance due to personnel error. The requirements of St. Lucie Plant Quality Instruction (QI) 13-2, "Housekeeping and Cleanliness Controls," were improperly interpreted. The Unit 2 containment building was posted as a Foreign Material Exclusion area, which required the logging of all tools, etc., that entered containment. Construction activities were in progress in the Emergency Core Cooling System (ECCS) sump area, and a post-job walkdown of the affected area was required when the work was completed. The decision was incorrectly made that the walkdown could be used in lieu of equipment logging requirements.

Several factors contributed to the misinterpretation of the requirements of QI 13-2. The QI did not provide clear guidance with respect to the requirement to control the ingress of material via a control log for in-containment areas other than the reactor cavity. Additionally, the QI did not clearly specify the plant configuration/operating MODE for which the requirements of the QI are applicable with respect to overall FME control within the containment building. Also contributing to the violation was that form HPP 1.4, "Loose Debris Verification Form," from procedure HPP-1, "Radiation Work Permits," and Appendix B from procedure AP 0010728, "Post Outage Review," provide additional methods for FME control within containment.

3. **CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED**

The Unit 2 ECCS sump inspection was completed on May 22, 1997. In addition, general cleanliness verifications of the containment building are required in accordance with procedure HPP-1, "Radiation Work Permits," and the inspections are documented on Form HPP 1.4, "Loose Debris Verification Form." The last general containment loose debris verification of the Unit 2 refueling outage was documented on May 25, 1997. The sump-specific and general containment inspection activities provide reasonable assurance that no foreign material was remaining in the Unit 2 containment building after completion of the refueling outage.

4. **CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS**

- A. Changes to QI-13-2, "Housekeeping and Cleanliness Control Methods," were approved on August 6, 1997. The procedure was enhanced by adding a new section that governs the exclusion of foreign material within the containment building during operational modes 1, 2, 3, and 4. Each work group performing maintenance within containment is responsible for maintaining their respective Foreign Material and Personnel Control Log. Supervisors are responsible for the control log and for FME inspections of containment areas affected by maintenance performed by their work group. Containment entries for inspection activities can be logged using Form HPP 1.4.
- B. Changes to Form HPP 1.4, "Loose Debris Verification Form," from procedure HPP-1, "Radiation Work Permits," were approved on August 6, 1997. The revision requires the use of Form HPP 1.4 for containment entries in modes 1, 2, 3, and 4 when no maintenance work is being performed (i.e., surveillance or clearance activities by Operations personnel, HP surveys, and Engineering or supervisory inspection activities). Personnel entering containment using this form are responsible for all items they hand carry and are required to inspect containment for foreign material.

- C. Changes to Appendix B from procedure AP 0010728, "Post Outage Review," were approved on August 6, 1997. These changes prohibit the use of the procedure Appendix B for FME control of maintenance activities.
 - D. FPL has completed benchmarking industry FME programs. As a result of this activity, FME control improvements were implemented at the lead FPL pilot plant, Turkey Point. St. Lucie plant is in the process of developing FME control program improvements similar to the process improvements made at Turkey Point. These FME control improvements will be completed by October 1, 1997.
5. Full compliance was achieved on May 25, 1997, at which time the Unit 2 containment was last inspected and declared free of any foreign material.

Violation B

10 CFR 50 Appendix B Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented instructions or procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Administrative Procedure ADM-0010432, Revision 11, "Control of Plant Work Orders" is the licensee procedure that implements this requirement with regard to maintenance planning. Step 7.1.1 of that procedure states, in part, that plant work activities which can affect the performance of Quality Related systems, components, structures, and equipment shall be appropriately planned and performed in accordance with written procedures, documented instructions and approved drawings to ensure the equipment meets its design function. In addition, Step 7.3.2.D states, in part, that if a work task is particularly complicated, involves many steps to complete, involves complex operations which must be completed in a specific order, or has other demanding requirements (i.e., beyond the skill of the craft), then sufficient details to accomplish the task must be provided in NPWO.

Contrary to the above, on February 21, 1997, Work Order 97004867 written to troubleshoot and modify the Digital Data Processing System (DDPS) computer points, perform post-maintenance testing and calibration, and save data to a Master/Backup computer disk, was not appropriately planned. Although the required work involved many steps and complex operations the Work Order did not include sufficient details to accomplish the task.

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

Response B

1. FPL concurs with the violation.
2. REASON FOR VIOLATION

This violation pertains to Work Order # 97004867 which was written to verify feed water flow calorimetric inputs. The work order was stated to have not been appropriately planned because the work instructions did not contain sufficient details to accomplish the task.

The Work Request was written by the planner for the system supervisor. The supervisor verbally gave the planner his level of detail and scope for instructions to be included in the work package. The planner subsequently wrote the work order to perform the job task.

The work instructions were written contrary to the ADM-0010432, Revision 11, "Control of Plant Work Orders." There was not a procedure in existence to perform the work, nor was there a Technical Manual instruction to utilize for work steps. The supervisor's

direction was relied upon in the work package. ADM-0010432 does not allow work to be performed solely at the direction of a plant supervisor. In addition, when the work scope expanded from verification of flow inputs to the modification of the constants of the DDPS program, a work scope change as required by procedure was not formalized.

3. **CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED**

- A. With regards to control of the work, positive actions were taken by the supervisor in that: a) the work was correctly directed by the supervisor, b) the Control of Computer Software procedure was used, c) instructions were written and included in the package as an aid for job turnover to the oncoming supervisor, and d) a technical review was performed on the work.
- B. The I&C planner and I&C supervisor involved with the Work Order were counseled on procedure compliance.

4. **CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS**

- A. On June 3, 1997, a letter was written to all I&C supervisors to reinforce their responsibilities with regards to working within the scope of the work orders.
 - B. On July 22, 1997, a stand down meeting with the planners was held to review the lessons learned from this event.
 - C. Procedure ADM-0010432, "Control of Plant Work Orders," will be revised to allow work to be directed by the supervisors within the bounds of existing plant procedures. This action will be completed by August 30, 1997. .
 - D. Procedure IC-1400022, "DDPS Mag Tape Loading Procedure" will be revised for loading information into DDPS. This action will be completed by August 31, 1997.
 - E. A new DDPS software procedure is being developed and will be completed by December 15, 1997.
5. Full compliance was achieved on July 22, 1997, with the completion of items 4A and 4B.