

## NOTICE OF VIOLATION

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 an NRC inspection conducted during the period from June 15, 1997, through July 26, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- A. 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances.

A scope change was made to nuclear plant work order (NPWO) 2830 on November 20, 1996 which contained step by step instructions for performing testing/troubleshooting activities to demonstrate, in part, the operability of the 125 volt dc bus cross tie circuit breaker.

Contrary to the above, the testing/troubleshooting activities were not performed in accordance with procedures of a type appropriate to the circumstances in that the step by step instructions contained in the scope change to NPWO 2830 did not provide adequate details for the testing/troubleshooting activities being performed. The scope change did not adequately delineate testing prerequisites and was not appropriately integrated with the other work control documents being used for this evolution. For example, it was not clear which steps of the original work order were to be completed prior to performing the steps in NPWO 2830. Also, it was not clear which of the breakers was to be worked.

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

- B. Technical Specification Section 6.8.1 states that written procedures shall be established, implemented, and maintained covering the fire protection program implementation.

Final Safety Analysis Report (FSAR) Appendix 9.5A Section 8, Quality Assurance Program, states that the QA program for fire protection is a part of the overall company QA program and is contained in the Florida Power and Light Topical Quality Assurance Report (FPL TQR).

FPL TQR Section 16.1 states that documented measures shall be used to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective materials and equipment and nonconformances are promptly identified and corrected as soon as practical.

Contrary to the above, in January 1995, corrective action was not initiated to resolve as soon as practical the 222 out of 365 mechanical fire barrier penetration seals installed in various safety related areas of the St. Lucie facility in which a licensee's engineering evaluation

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determined were not bounded by the vendor's design and test documentation.

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 St. Lucie Nuclear Plant, 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 25 day of August 1997.

