

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 the NRC inspections conducted during the period of September 7 through October 11, 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. Section 6.2.2.f of Technical Specifications states, in part, that "Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions." Furthermore, the Technical Specification requires that "An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time."

Contrary to the above, the licensee failed to limit the working hours of unit staff who perform safety-related functions as evidenced by the following:

On September 29, a Non-Licensed Operator worked 28 hours in a 48-hour period, which exceeded the requirement for working no more than 24 hours in a 48-hour period.

On September 19, a Senior Reactor Operator worked 28 hours in a 48-hour period, which exceeded the requirement for working no more than 24 hours in a 48-hour period.

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

- B. 10 CFR 50, Appendix B, Criterion X, requires "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. Such inspections shall be performed by individuals other than those who performed the activity being inspected." The licensee's Topical Quality Assurance Report implements this requirement in Section 10.2.5 stating "Mandatory hold points shall be identified in process documents when witnessing and inspecting must be performed and signed-off by the responsible personnel before work can proceed."

Procedure QI-2-PR/PSL-1, Revision 15, "Quality Assurance Program," Section 4.3 stated "Quality Control (QC) holdpoints are mandatory requirements, or are requested by supervision. A QC holdpoint shall not be bypassed."

Contrary to the above, on August 11 and again on August 13, the licensee failed to perform the QC inspections during QC holdpoints as

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required by Procedure QI-2-PR/PSL-1 during reassembly of the SB 37-2, the Ultimate Heat Sink Valve.

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

- C. 10 CFR 50 Appendix B, Criterion III, requires measures be established which assure that applicable regulatory requirements and the design basis for safety-related components and systems are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, as of September 25, 1997, the licensee's measures did not assure that applicable regulatory requirements and the design basis would be correctly translated into specifications, drawings, procedures, and instructions, in that:

- (1) As described in Condition Report 97-1733, the results of design basis testing of motor-operated valves had not been incorporated into the affected design documents.
- (2) As described in Condition Report 97-1658, the data base which provided the setpoints for design basis operation of motor-operated valves had not been updated to reflect revised requirements from calculations and evaluations.

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

- D. 10 CFR 50.120(b)(1) requires, in part, that training programs for instrument and control technicians, mechanical maintenance personnel, and electrical maintenance personnel be established, implemented and maintained using a systems approach to training as defined in 10 CFR 55.4, including, in part, an evaluation of trainee mastery based on learning objectives describing desired task performance.

10 CFR 50.120(b)(2) requires, in part, sufficient records of trainee evaluation, including trainee mastery of desired task performance, be maintained by the licensee to maintain program integrity and that sufficient records be available for NRC inspection to verify the adequacy of the program.

Contrary to the above, as of October 3, 1997, ADM-8.02, Revision 15, "Conduct of Maintenance," was inadequate in that it failed to implement a systems approach to training for electrical, mechanical and instrument and control personnel by allowing the evaluation of trainee mastery without established specifications and objective-based evaluation criteria as required by the systems approach to training. In addition, ADM-08.02, Revision 15, "Conduct of Maintenance," did not contain the provision for documenting task qualification evaluations as required by a systems approach to training.

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



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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 10th day of November 1997

