

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 October 12 through November 22, 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. 10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by documented instructions and procedures and shall be accomplished in accordance with those instructions and procedures. The licensee's Topical Quality Assurance Report implements this requirement in Section 5.0.

Licensee Work Package 1038, step 38, stated, in part, "Apply or verify markings on the top and bottom of one of the main girders to show the travel limits from the centerpost centerline. Note: Ensure the locations of the markings are visible to the hydrajack operator and to the person in charge on the floor."

Contrary to the above, on November 16, 1997, no markings were identified on the top and bottom of the main girders. In addition, the markings on one side of one main girder were not visible to the hydrajack operator and to the person in charge on the floor.

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

- B. Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A, Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Revision 2, February 1978. Appendix A paragraph 7.e requires licensee's establish procedures for (1) Access Control to Radiation Areas Including a Radiation Work Permit System and (7) Personnel Monitoring.

Contrary to the above, on November 4, 1997, the licensee did not have adequate written access control procedures to radiation areas in that the procedures did not provide for the issuance of tele-dosimetry devices that would ensure the dose limit setpoints applied in tele-dosimetry monitoring systems were in agreement with the limits established on the applicable Radiation Work Permits.

This is a Severity Level IV violation (Supplement IV) applicable to both Units.

- C. Technical Specification 6.8.1.a requires that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A, Regulatory Guide 1.33, Quality Assurance

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Program Requirements (Operation), Revision 2, February 1978. Appendix A paragraph 7.e requires licensee establish procedures for (1) Access Control to Radiation Areas Including a Radiation Work Permit System and (7) Personnel Monitoring.

Section 5.9 of Health Physics Procedure (HPP)-1, Revision 10, "Radiation Work Permits (RWPs)", required a job specific RWP for entry into the Reactor Containment Building (RCB).

Section 7.1 of HPP-3, Revision 6, "High Radiation Areas (HRAs)", specified responsibilities of radiation workers in HRAs. The procedure required radiation workers be knowledgeable of dose margin and RWP requirements.

Contrary to the above, on November 4, 1997, a radiation worker entered the Unit 1 Reactor Containment Building (RCB) without signing in on a job specific RWP for the RCB as required by Section 5.9. In addition, on November 4, 1997, a radiation worker entered the Unit 1 RCB without knowledge of the RWP dose limit and dose rate limits for the RWP the worker was using as required by Section 7.1.

This is a Severity Level IV violation (Supplement IV) applicable to both Units.

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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request

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withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 18th day of Dec. 1997.

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