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 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

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SUBJECT: Forwards Suppl A to "Independent Verification of Design & Const for St Lucie Unit 2 Nuclear Generating Station, Resolution of Discrepancies & Corrective Action Plans."

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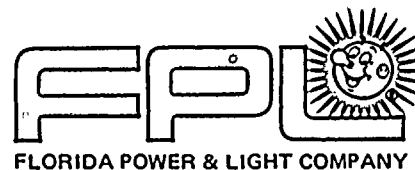
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March 21, 1983
L-83-160

Office of Nuclear Reactor Regulations
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: ST. LUCIE UNIT NO. 2
DOCKET NO. 50-389
ENGINEERING VERIFICATION PROGRAM

Enclosed please find Supplement A to the Engineering Verification Program (EVP) Report. The original report was transmitted to you January 10, 1983 by letter No. L-83-10. The supplement includes additional clarification of the process used in resolving discrepancies identified during the program.

Corrective action plans, which have been formulated by the St. Lucie Project Team are also included in the supplement.

The EVP Task Force formal concurrence with the planned corrective action closes the loop on all eight observations.

It should be noted that the FPL Project Team examined all comparison sheets prepared by the EVP Task Force as well as the 84 discrepancies resulting from that comparison process. The Project Team concurred that no generic problems were indicated which would increase the risk to the health and safety of the public; however, the project is proceeding "as a good idea" but not a requirement, the recommendation to augment our color coding system.

We believe this material will assist you and your staff in completing the assessment of the program by March 31, 1983.

Boo!

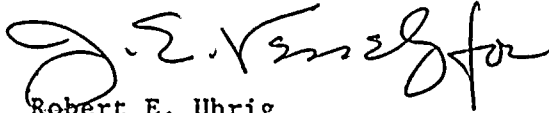
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Should you have any questions concerning this supplement please do not hesitate to contact us.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/RJS/PPC/rms

Enclosure

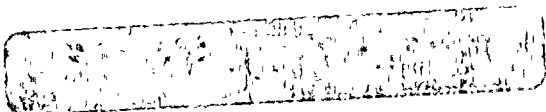
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INDEPENDENT VERIFICATION
OF
DESIGN AND CONSTRUCTION
FOR
ST. LUCIE UNIT NO. 2
NUCLEAR GENERATING STATION

SUPPLEMENT A
RESOLUTION OF DISCREPANCIES
AND
CORRECTIVE ACTION PLANS

Prepared for
FLORIDA POWER & LIGHT COMPANY

MARCH 1983

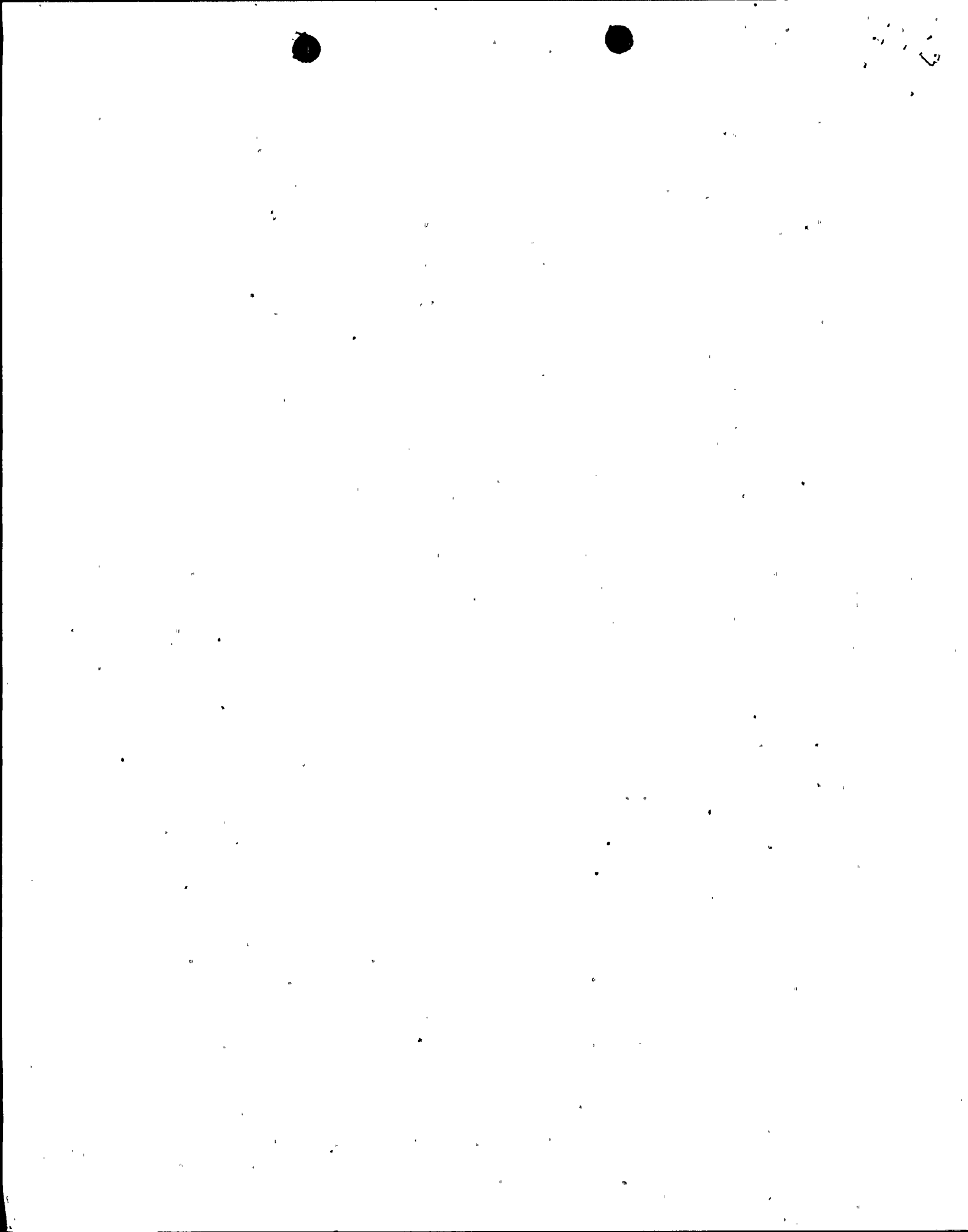




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INTRODUCTION

Supplement A is issued to provide clarification of the review and decision process leading to resolution by corrective action, where required, of all Engineering Verification Program (EVP) Discrepancies.

Figure 1 is a step-by-step procedure demonstrating, in flow chart format, the process used for resolution of differences between the independent and existing design along with discrepancies noted in installation and testing of verification items. The six-step process shows how the EVP Task Force, assisted by the Review Committee and the St. Lucie Unit 2 Project Team, carried the program from design comparison through approval of corrective actions now underway.

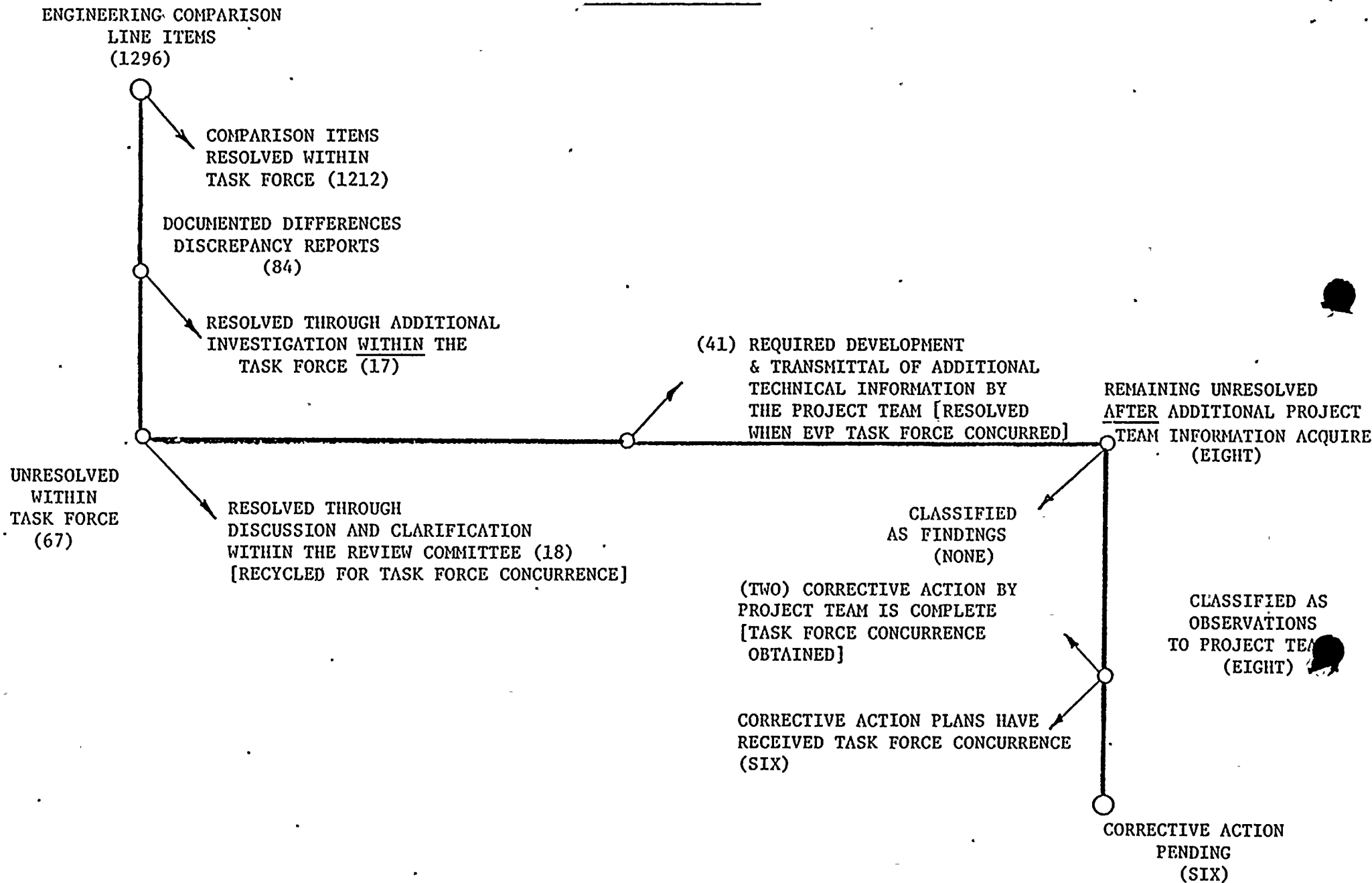
A tabular summary of actions by the EVP Task Force, Review Committee and Project Team is included to provide a more basic description of the resolution process.

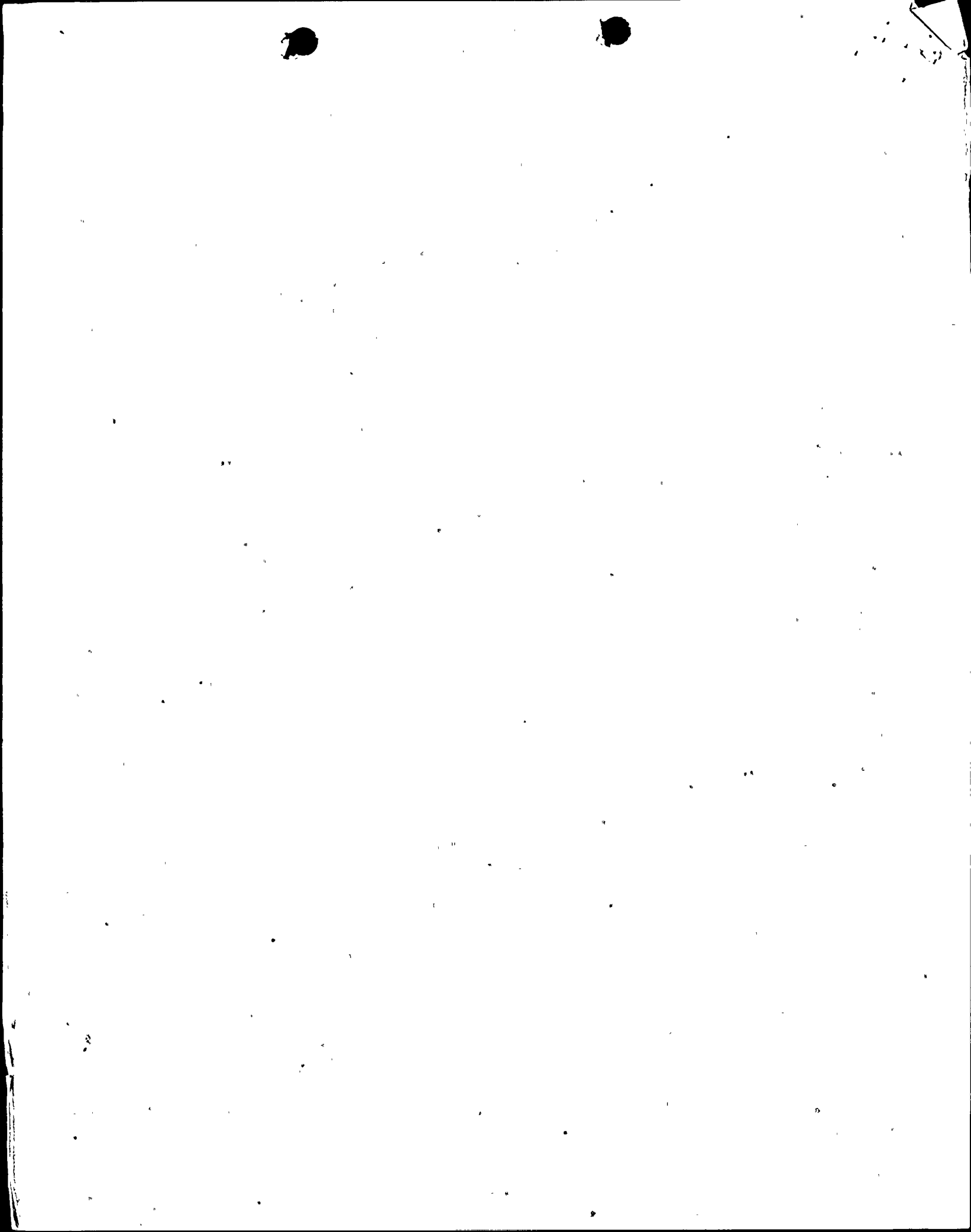
Included, as a supplement to Volume 3 of the Engineering Verification Program Report (January 1983), are completed discrepancy reports for the eight program observations. The Project Team in processing the observations has identified the corrective actions planned and/or completed. The Task Force has formally concurred with all corrective action plans.

This additional information is provided in support of the EVP Task Force conclusion that the small number of observations (no findings) resulting from this extensive verification program confirm:

- Design, procurement and construction is in accord with good engineering practice.
- Demonstrated product quality indicates the effectiveness of QA measures.
- No Generic process or procedural problems affecting plant safety were detected.

FIGURE 1
ENGINEERING VERIFICATION PROGRAM
STEP PROCEDURE FOR RESOLUTION
OF DISCREPANCIES





A SUMMARY OF ACTIONS BY THE EVP TASK FORCE
REVIEW COMMITTEE AND PROJECT TEAM
RESOLVING
84 DISCREPANCY REPORTS

REPORT NO.	RESOLUTION WITHIN EVP TASK FORCE	RESOLVED WITHIN REVIEW COMMITTEE	CATEGORY STATUS BY COMMITTEE	CATEGORY ASSIGNED BY PROJECT TEAM	PROJECT TEAM ACTION PROPOSED (REFERENCE)	EVP TASK FORCE CONCURRENCE (REFERENCE)
EVP-U-1	Resolved. The SI Tank Isol Valve was specified to 1974 edition of ASME III Code, a more recent edition than specified by the independent design.					
EVP-U-2	Unresolved. Transmitted to review committee.	Resolved after recycle with additional information indicating marginal possibility of valve submergence. However valve is in open (safe) condition during maximum flooding.				
EVP-U-3	Resolved. Project max. specified valve opening time is acceptable.					
EVP-U-4	Resolved. The existing valve C is acceptable since it exceeds that specified by both independent project design.					
EVP-U-5	Unresolved. Transmitted to review committee.	Resolved after recycle EVP Task Force agreed to examine site operational test records for flow and Delta p. Confirmed during field verification phase by task force.				



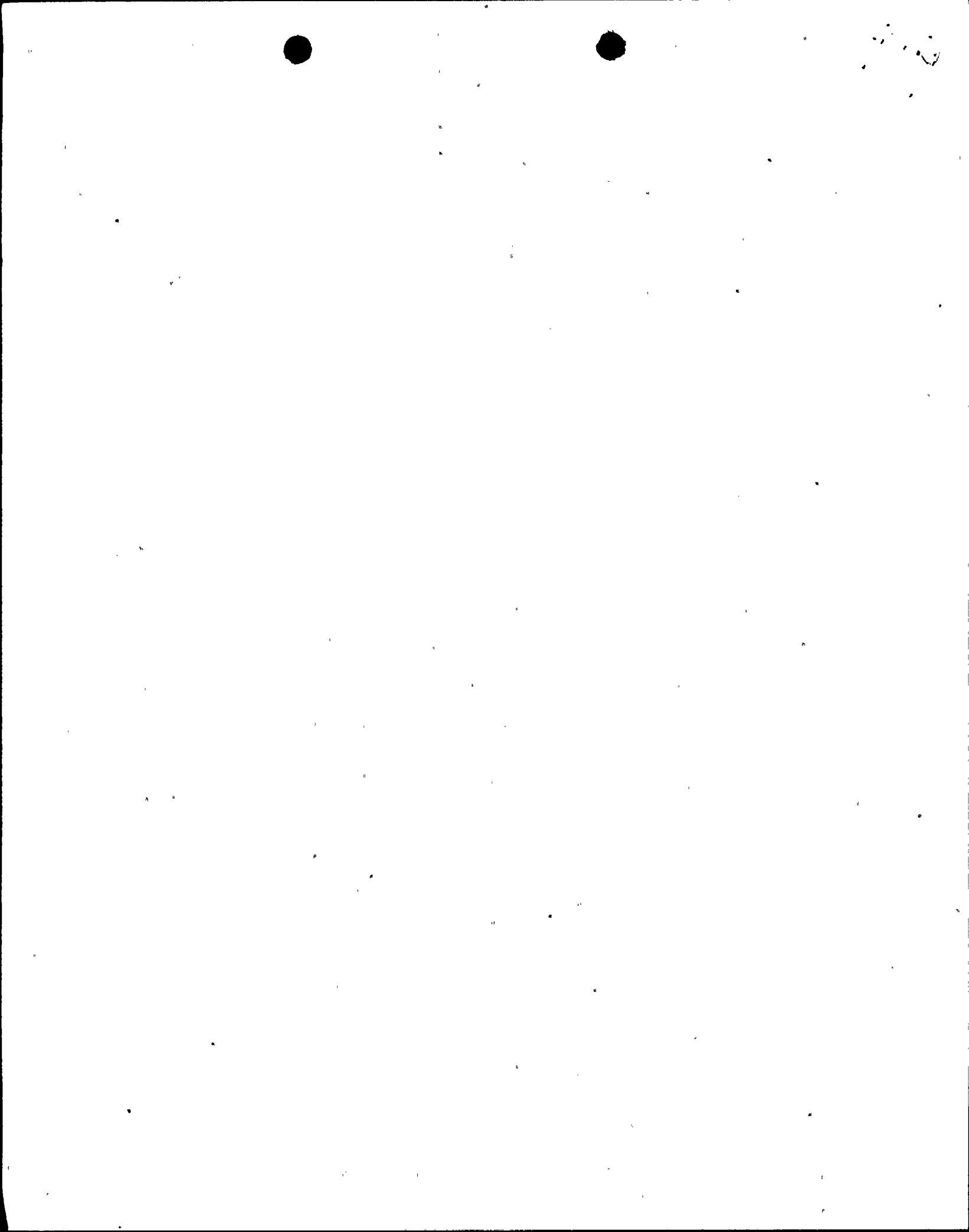
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EVP-U-6	Resolved. The valve operator (actual) qualification test cycles exceeds independent specification numbers. The equipment is, therefore, acceptable as delivered.					
EVP-U-7	Unresolved. Transmitted to review committee.	Resolved after recycle. Although the valves were procured as duplicates of St. Lucie #1 valves. Later vendor tests qualified the limiter operator to meet general standards for Class IE equipment.				
EVP-U-8	Unresolved	Resolved after recycle. Although the valve operators were not required (as originally procured) to be seismic qualified as IE equipment. The SQRT evaluation concluded seismic qualification.				



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EVP-U-9	Unresolved. Transmitted to review committee.	Resolved after recycle. Although the existing valve design did not require diverse and redundant position indication it was concluded both designs assure the plant can enter into cold shutdown w/o overpressurization.				
EVP-U-10	Resolved. Adequate number of limit switches which are diverse and redundant are available.					
EVP-U-11	Unresolved. Transmitted to review committee.	Resolved after recycle by correction of setpoint typographical error to absolute instead of gauge pressure in spec. revision #03.				
EVP-U-12	Resolved. There is no requirement to actuate the valve after time delayed spray.					



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EVP-U-13	Unresolved	Resolved after recycle. Although not included in the existing specification the project team referenced EMD imposing the same contact rating to which the vendor provides a letter of compliance.				
EVP-U-14	Unresolved Transmitted to review committee.	Not acceptable. Transmitted to project team 12/15/82. Project Team to investigate and take corrective action as required.	Observation	Observation	A review team has been assigned to resolve the concerns expressed by EVP-U-14 (Rev. B). Their evaluation will address safety impact, impact on QA program and reportability. (Ref. Trans. to D. Miller dated 1/11/83)	The EVP Task Force concurs with the Project Team response and planned action. Transmitted to D.D. Miller on 1/11/83. (Ref. EVP-529/SL, dated 1/28/83)
EVP-U-15	Unresolved Transmitted to review committee.	Resolved after recycle to Phase 2 for verification of field packing certification. Valve manufacturer packing was replaced on all valves. See EVP-U-14.				
EVP-U-16	Unresolved.	Resolved after recycle to Phase 2 for field verifi-				

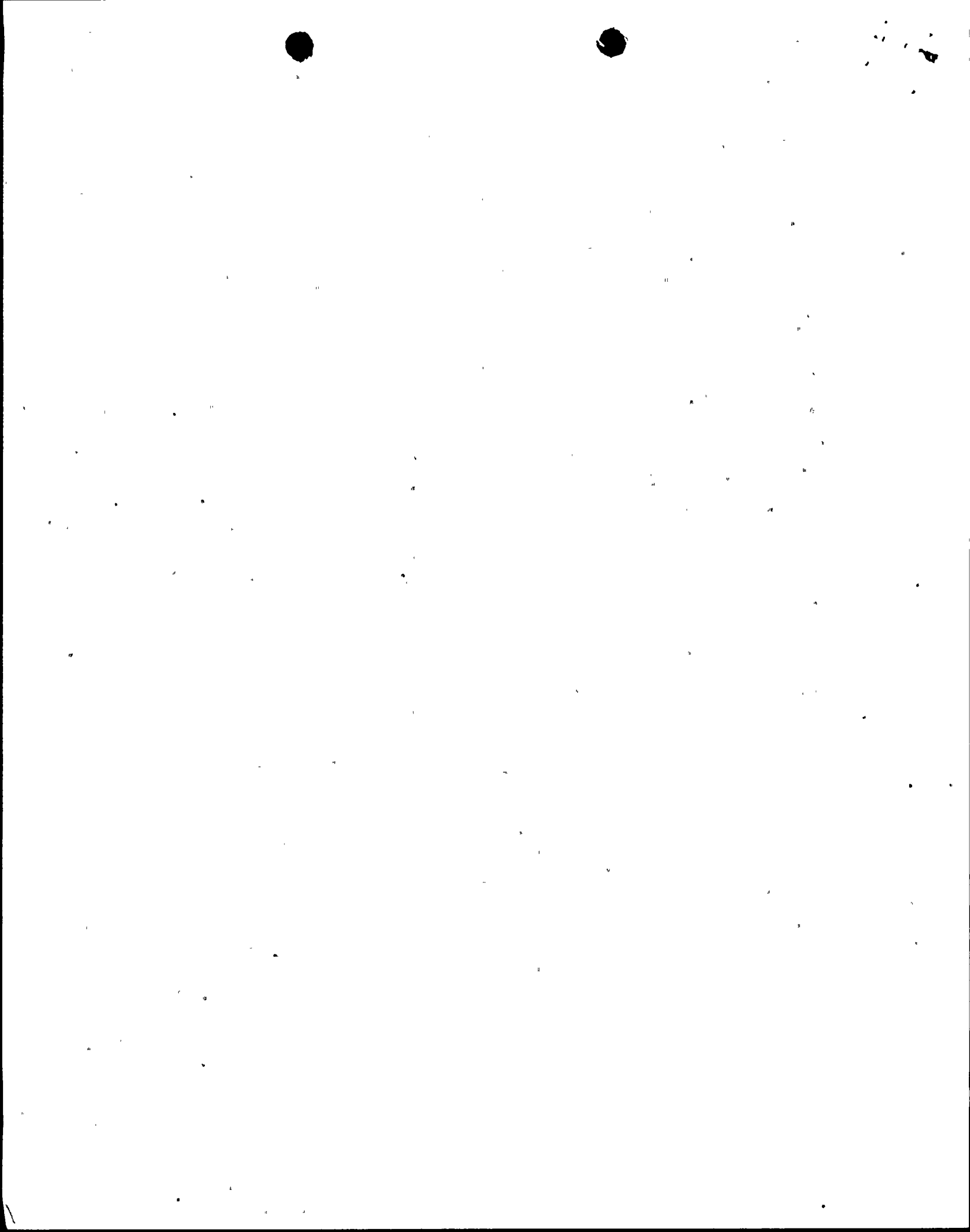
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EVP-U-16 (cont.)		cation. Although system condition prohibited hand-wheel operational test. The Project Team provided acceptable limiter torque handwheel sizing criteria.				
EVP-U-17	Unresolved. Transmitted to review committee	Resolved after recycle. Project Team supplied environmental qualification report which projects a 40 year integrated dose well within the existing specification level.				
EVP-U-18	Unresolved. Transmitted to review committee.	Resolved after recycle. The Project Team supplied evidence to the review committee assuring a more benign chemical environment than existing specification level. Project specification will be updated.				
EVP-U-19	Unresolved. Transmitted to review committee	Resolved after recycle. The valve manufacturer received CE approval of an equivalent cleaning class prior to delivery.				



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EVP-U-20	Unresolved. Transmitted to review committee	Resolved after recycle. Review committee discussion confirms that either lock open setpoint could have been selected to provide a safe operational condition.				
EVP-U-21	Resolved. S.I. Tank Isolation Valve design loads and stress limits specified in both the independent and original equipment were found to equivalent.					
EVP-U-22	Resolved. Original design specified cooling water temperatures are higher resulting in a more conservative design.					
EVP-U-23	Unresolved. Transmitted to review committee	Resolved after recycle. Further investigation of FSAR seismic accelerations revealed that original specification seismic levels are correct.				



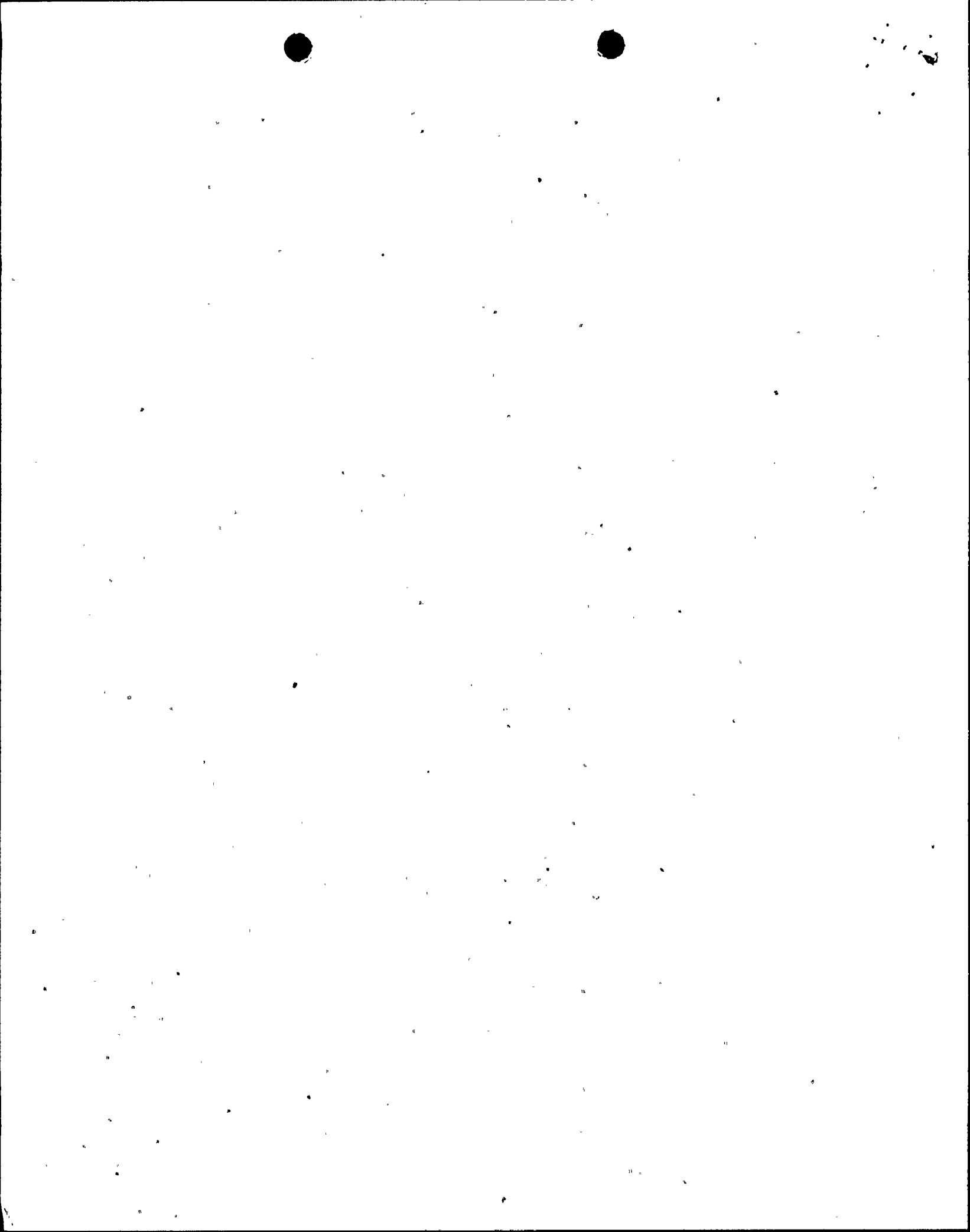
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EVP-U-24	Unresolved. Transmitted to review committee.	Resolved after recycle. The HPSI pump manufacturer provided a critical speed analysis assuring that the critical speed/ operating speed difference exceeds 20%.				
EVP-U-25	Unresolved. Transmitted to review committee.	Resolved after recycle. A summary of loads and stress limits by the Project Team proves the original specification values are correct.				
EVP-U-26	Unresolved. Transmitted to review committee	Resolved after recycle. It was determined that the number of thermal transients specified is not sufficient to require cyclic operation analysis.				
EVP-U-27	Resolved. Interference with pull space requirements was found during the field installation phase. This is a maintenance-related item (not safety-related). Transmitted to Project Team for information only.					



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UIR-1	Unresolved. Transmitted to review committee.	Resolve after recycle. NRC staff has reviewed previously and found the clean-up system valve installation complies with single failure criterion.				
UIR-2	Unresolved. Transmitted to review committee.	Resolved after recycle. The Project Team supplied references to industry standards specified, and generic qualification reports covering these requirements.				
UIR-3	Unresolved. Transmitted to review committee.	Resolved after recycle. The Project Team supplied references to industry standards specified, and generic qualification reports covering these requirements.				
UIR-4	Resolved. Since the installation has already been completed the discrepancy is irrelevant. Confirmed in the field.					

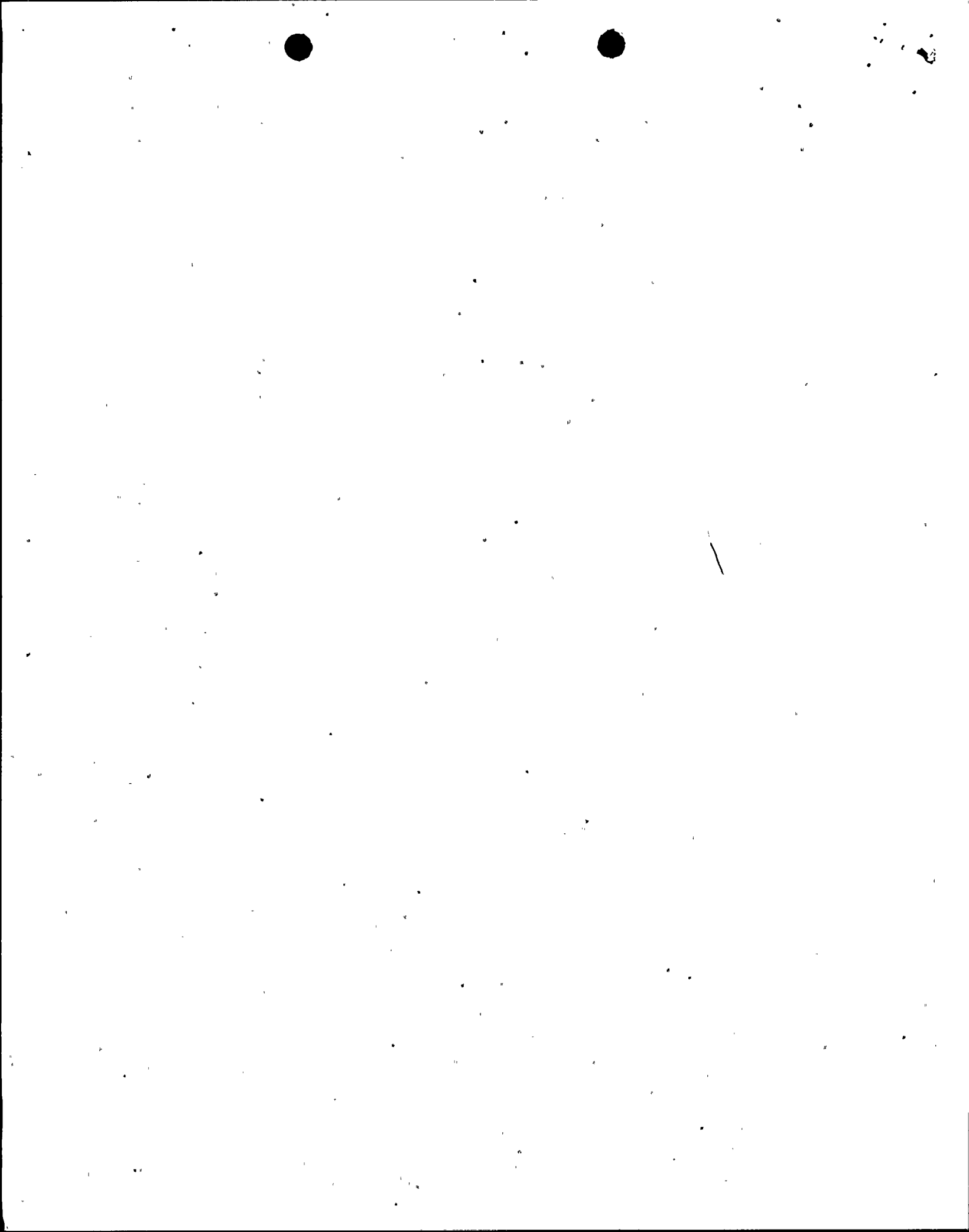


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UIR-5	Unresolved. Transmitted to review committee.	Resolved after recycle. No vendor requirement for failure mode. HVAC plant installation spec. identifies fail "as is".				
UIR-6	Unresolved. Transmitted to review committee.	Resolved after recycle. Cycling tests are not required for infrequently used clean-up system values. However pre-op testing was performed.				
UIR-7	Unresolved. Transmitted to review committee.	Resolved after recycle. The clean-up system has been previously reviewed against single failure criterion and approved by NRC staff.				
UIR-8	Unresolved. Transmitted to review committee.	Resolved after recycle. It was determined by the Project Team and agreed by the Task Force that the H ₂ recombiner electrical load need not be included in the first block D-G Loading Sequence.				

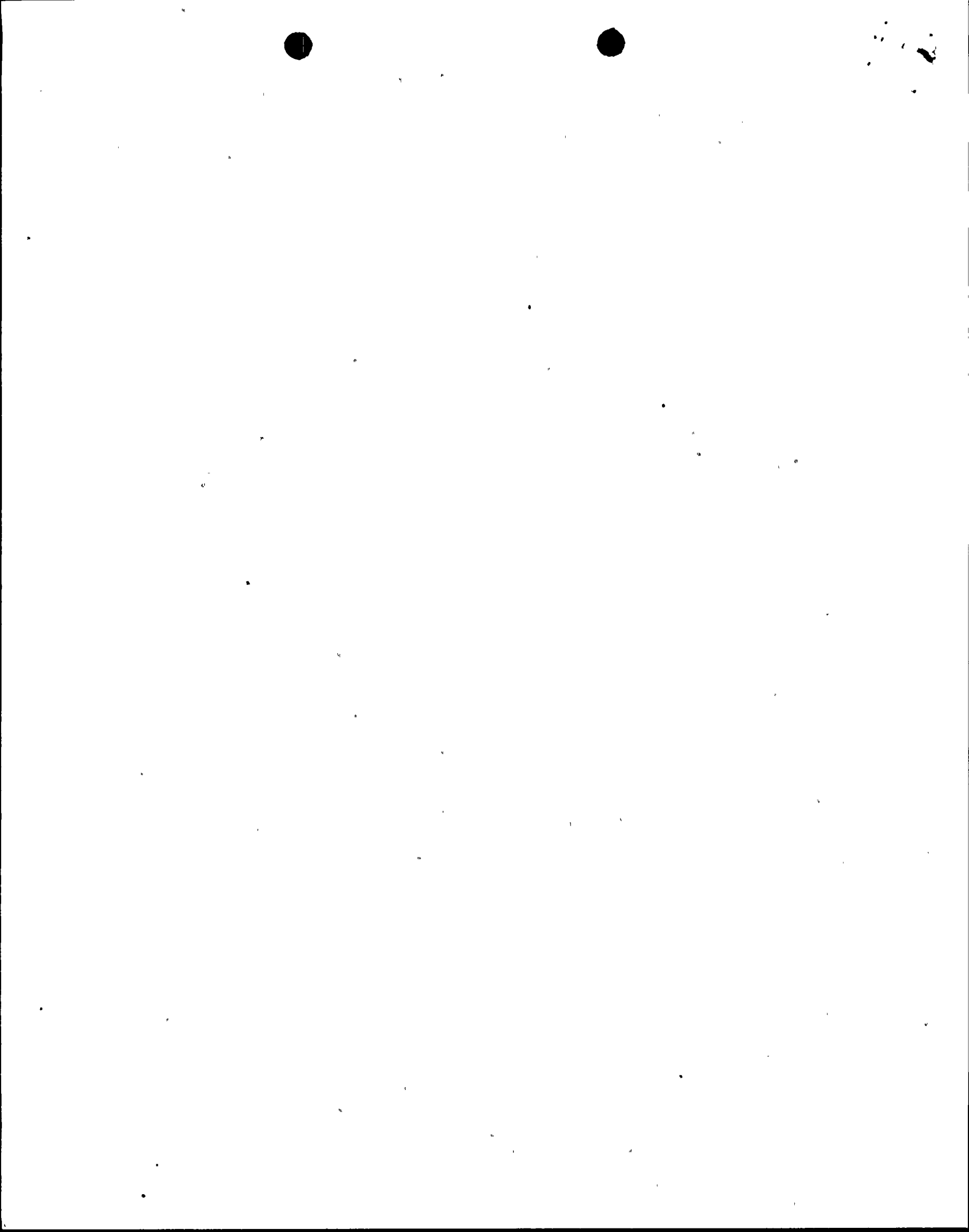
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UIR-9	Unresolved. Transmitted to review committee.	Resolved after recycle. Backup protection for the electrical penetration (per R.G. 1.63) has been previously agreed by the Project Team as a backfit commitment.				
UIR-10	Unresolved. Transmitted to review committee.	Resolved after recycle. The project supplied acceptable reference to all applicable standards requirements.				
UIR-11	Resolved. The Task Force determined that operating pressure specification is not essential since design pressure is indicated.					
UIR-12	Unresolved. Transmitted to review committee.	Resolved after recycle. The clean-up system valve design pressure, as stated in the data sheet (Appendix D, Sheet 60), provides the required pressure differential information.				



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UIR-13	Unresolved. Transmitted to review committee.	Resolved after recycle. No vendor spec. Requirement for failure mode. HVAC plant installation spec. identifies fail "as is".				
UIR-14	Resolved. The outdoor relative humidity level is not essential to the design and/or safety function of the clean-up system valve.					
UIR-15	Resolved. Indoor ambient pressure is not essential to the design and/or function of this component.					
UIR-16	Resolved. Specification of a flow test is not essential to the valve safety function.					
UIR-17	Resolved. Pressure prop across the open valve at design flow is provided by the vendor. Not a design spec. requirement.					



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UIR-18	Unresolved. Transmitted to review committee.	Resolved after recycle. The offsite release, in the absence of humidity control, is below 10CFR100 guidelines.				
UIR-19	Resolved. The dust-holding capacity of the HEPA filter, though short, does not affect the safety function.					
UIR-20	Resolved. The outdoor relative humidity is not specified for the HEPA, since it is not essential to the safety function.					
UIR-21	Unresolved. Transmitted to review committee.	Resolved after recycle. Existing design, though double swing door in front differing from independent design, satisfies requirements. Confirmed during field verification phase.				
UIR-22	Unresolved. Transmitted to review committee.	Resolved after recycle. Rationale for applying elastoplastic analysis to missile barriers is acceptable. Yield stress limitation does not apply.				



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UIR-23	Unresolved. Transmitted to review committee.	Resolved after recycle. The ductility factor for flexure, as utilized in design, is acceptable and in accord with FSAR.				
UIR-24	Unresolved. Transmitted to review committee.	Resolved after recycle. Supplementary calculations supplied by the project team demonstrate that shear reinforcing plates are not required. EVP Task Force concurs.				
UIR-25	Unresolved. Transmitted to review committee.	Resolved after recycle. The code effective date was determined to be in error. The FSAR and official design documentation were however found to be correct.				
UIR-26	Unresolved. Transmitted to review committee.	Resolved after recycle. ANSI document requirements, though not completely listed in the specification are listed in the standard spec's and purchase documents. EVP task force investigated and concurs.				



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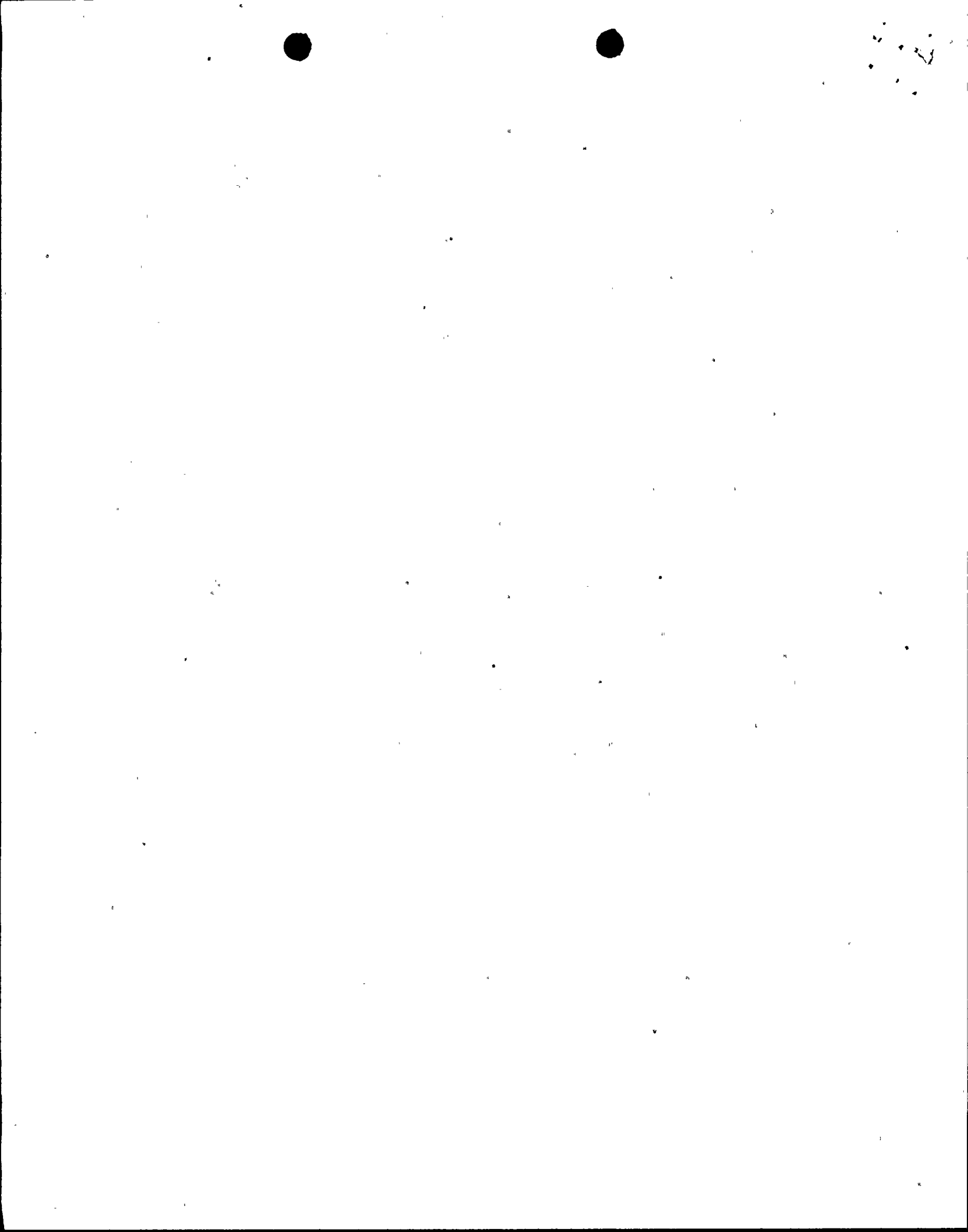
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UIR-27	Unresolved. Transmitted to review committee.	Resolved after recycle. Reference regulatory guides though not specified were complied with wherever applicable.				
UIR-28	Unresolved. Transmitted to review committee.	Resolved after recycle. Though omitted from the original specification the requirements of 10CFR21 were imposed by subsequent P.O. Supplement No. 8.				
UIR-29	Unresolved. Transmitted to review committee.	Resolved after recycle. Impact test requirements required for Safety Class 2 components is covered by Ebasco standard specification. EVP Task Force concurs.				
UIR-30	Unresolved. Transmitted to review committee.	Resolved after recycle. Though not included in the existing design spec. fracture toughness was reviewed and accepted to ASME III requirements.				



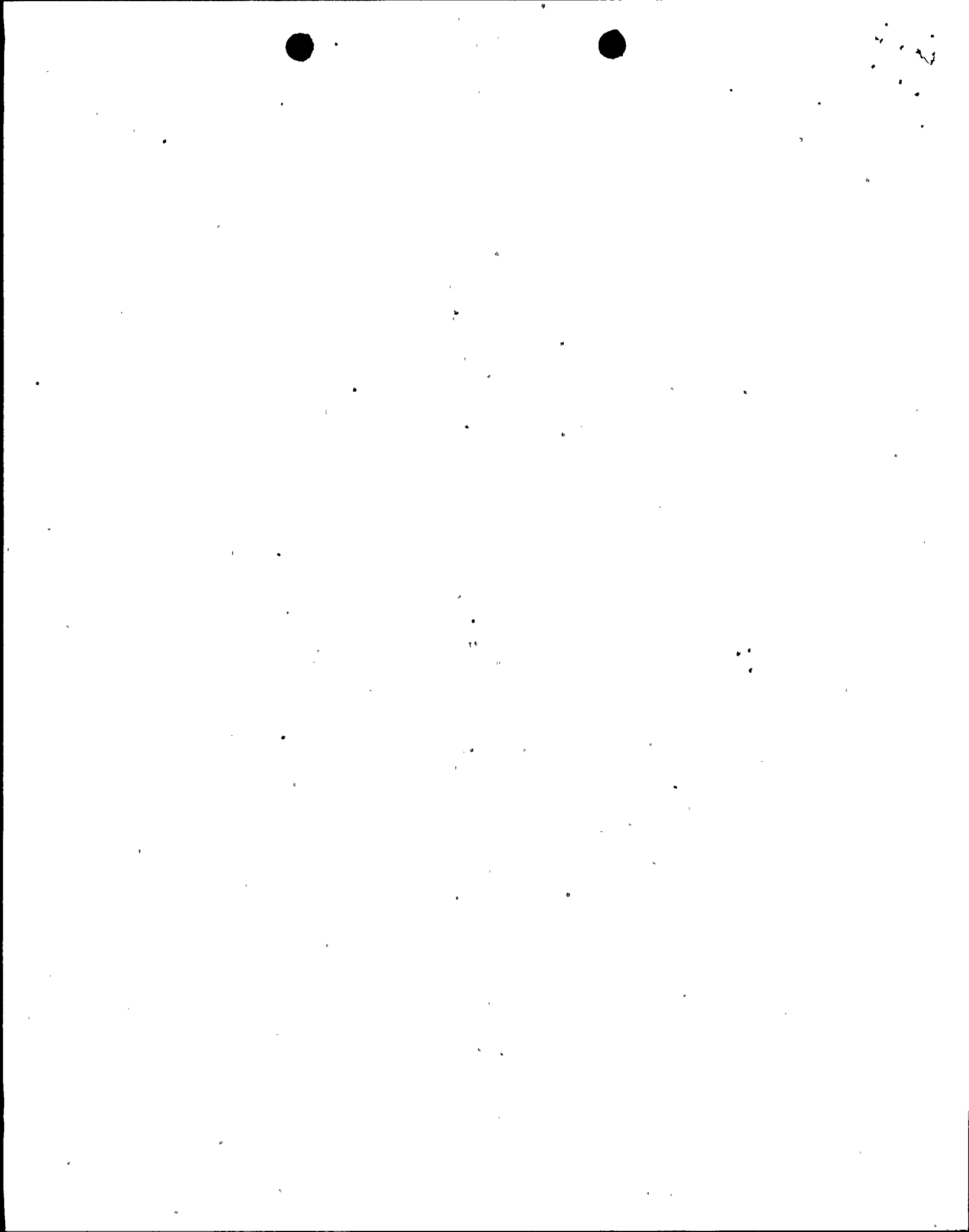
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UIR-31	Unresolved. Transmitted to review committee.	Resolved after recycle. Closed bases on resolution of UIR-38.				
UIR-32	Unresolved. Transmitted to review committee.	Resolved after recycle. No requirement for closing the MSIV from outside control room since the turbine and reactor are tripped prior to exit.				
UIR-33	Unresolved. Transmitted to review committee.	Resolved after recycle. Design acceptance to NRC per SER. MSIS signal on turbine stop valve is the acceptable solution to single MSIV failure.				
UIR-34	Unresolved. Transmitted to review committee.	Resolved after recycle. Same resolution as UIR-33.				
UIR-35	Unresolved. Transmitted to review committee.	Resolved after recycle. same resolutions as UIR-33.				
UIR-36	Unresolved. Transmitted to review committee.	Resolved after recycle. same resolutions as UIR-33.				



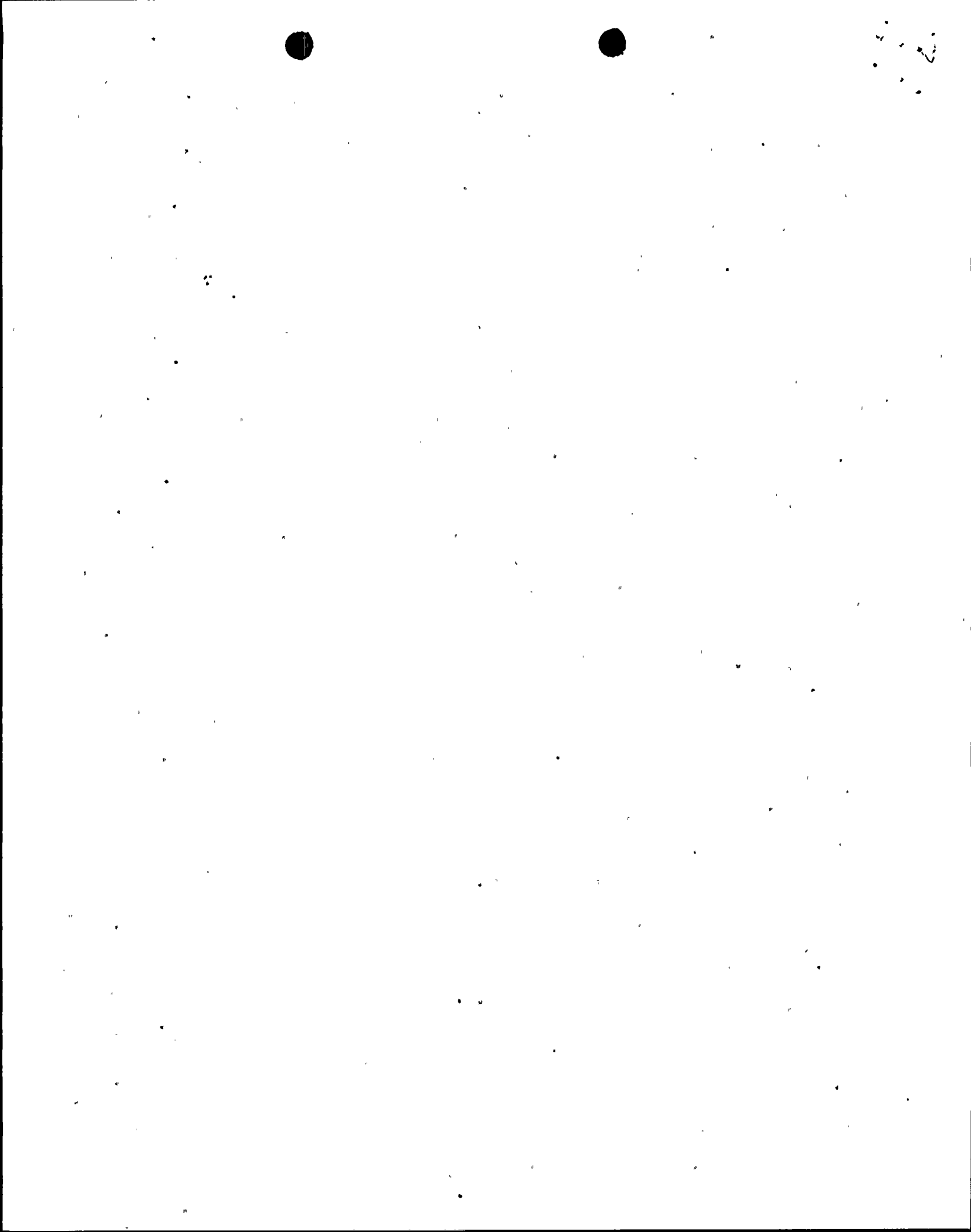
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UIR-37	Unresolved. Transmitted to review committee.	Resolved after recycle. Valve fails open on loss of electric power, consistent with FSAR Chapter 10, p. 10.3.4. FSAR table 6.2-53 is incorrect and will be corrected to read open.				
UIR-38	Unresolved. Transmitted to review committee.	Resolved after recycle. A qualified accumulator provided for each valve holds valve open in event of air-supply failure.				
UIR-39	Unresolved. Transmitted to review committee.	Resolved after recycle. A breaker and fuse in series provides back-up protection to the electrical penetration.				
UIR-40	Unresolved. Transmitted to review committee.	Resolved after recycle. Operation at the service factor rating is not considered the normal mode of operation.				
UIR-41	Unresolved. Transmitted to review committee.	Resolved after recycle. SIT isolation valves meet the guidelines criteria specified in Reg. Guide 1.22.				



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UIR-42	Unresolved. Transmitted to review committee.	Resolved after recycle. Project Team supplied information regarding the redundant position indication available during normal operation. See EVP-U-9 for resolution.				
UIR-43	Unresolved. Transmitted to review committee.	Resolved after recycle. Alarm indication is not required to initiate normal operator actions. EVP Task Force concurs.				
UIR-44	Unresolved. Transmitted to review committee.	Resolved after recycle. Isolation switches are available. Closing of the SI tank isolation valves can be accomplished by use of auxiliary Bldg. switches.				
UIR-45	Unresolved. Transmitted to review committee.	Resolved after recycle. It was determined by the Project Team and agreed by the Task Force that the H ₂ recombiner electrical load need not be included in the first block D-G loading schedule.				



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UIR-46	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82.	Observation	Observation	Corrective action has been completed. Identification tags for individual circuit breakers are in place. Photographic evidence was provided. (Ref. Trans. to T. H. Blodgett dated 1/5/83).	The EVP Task Force concurs with Project Team response. (Ref. Memo-Blodgett to Feigenbaum dated 1/24/83.)
UIR-47	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82. Open item requiring project justification of present design or corrective action.	Observation	Observation	The FSAR specifies identification of safety-related electrical equipment by appropriate color coded tagging, paint or tape. The Project Team will review related equipment to ensure proper color coding prior to commercial operation. (Ref. memo Feigenbaum to Blodgett).	The EVP Task Force concurs with Project Team response and planned corrective action. (Ref. Memo T.H. Blodgett to Distribution dated 1/24/83.)
UIR-48	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82. Open item requiring project justification of present design or corrective action.	Observation	Observation	The FSAR specifies identification of safety-related electrical equipment by appropriate color coded tagging, paint or tape.	The EVP Task Force concurs with Project Team response and planned corrective action. (Ref. Memo T.H. Blodgett to Distribution dated 1/24/83.)



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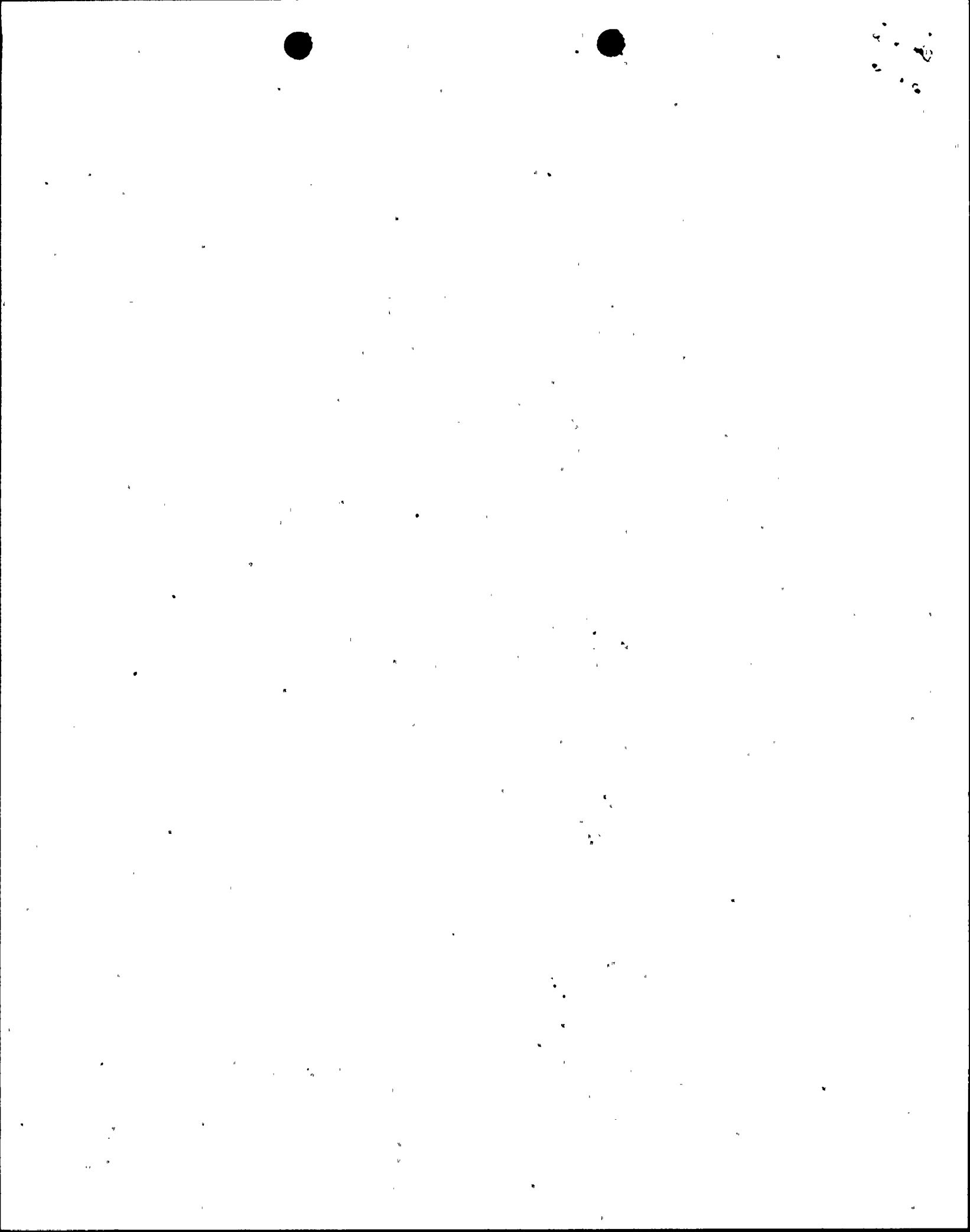
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UIR-48 (cont.)					The Project Team will review related equipment to ensure proper color coding prior to commercial operation. (Ref. memo Feigenbaum to Blodgett).	
UIR-49	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82. Open item requiring project justification of present design or corrective action.	Observation	Observation	The FSAR specifies identification of safety-related electrical equipment by appropriate color coded tagging, paint or tape. The Project Team will review related equipment to ensure proper color coding prior to commercial operation. (Ref. memo Feigenbaum to Blodgett).	The EVP Task Force concurs with Project Team response and planned corrective action. (Ref. Memo T.H. Blodgett to Distribution dated 1/24/83.)



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UJR-50	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82. Open item requiring project justification of present design or corrective action.	Observation	Observation	The FSAR specifies identification of safety-related electrical equipment by appropriate color coded tagging, paint or tape. The Project Team will review related equipment to ensure proper color coding prior to commercial operation. (Ref. memo Feigenbaum to Blodgett).	The EVP Task Force concurs with Project Team response and planned corrective action. (Ref. Memo T.H. Blodgett to Distribution dated 1/24/83.)
UJR-51	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82.	Observation	Observation	Corrective action has been completed. Identification tags for individual circuit breakers are in place. Photographic evidence was provided. (Ref. Trans. to T. H. Blodgett dated 1/5/83).	The EVP Task Force concurs with Project Team response. (Ref. Memo-Blodgett to Feigenbaum dated 1/24/83.)



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UIR-52	Unresolved. Transmitted to review committee.	Not acceptable. Transmitted to Project Team 12/15/82. Open item requiring project justification of present design or corrective action.	Observation	Observation	The FSAR specifies identification of safety-related electrical equipment by appropriate color coded tagging, paint or tape. The Project Team will review related equipment to ensure proper color coding prior to commercial operation. (Ref. memo Feigenbaum to Blodgett).	The EVP Task Force concurs with Project Team response and planned corrective action. (Ref. Memo T.H. Blodgett to Distribution dated 1/24/83.)
UIR-53	Unresolved Transmitted to review committee.	Resolved after recycle. The "true & level" finish condition is within industry standards.				
UIR-54	Unresolved Transmitted to review committee.	Resolved after recycle. Installation of the radiation monitor using floor mounted frame, while not per initial plans, is in conformance with a correctly processed FCR.				



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UIR-55	Unresolved. Transmitted to review committee.	Resolved after recycle. MSI valve leak test had been performed (reverse flow) utilizing equivalent N ₂ Flow rates.				
UIR-56	Unresolved. Transmitted to review committee.	Resolved after recycle. Valve closing time tests had been performed. Results were furnished to and acceptable to EVP Task Force.				

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