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OCTOBER 03 1986

L-86-405

Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30323

Dear Dr. Grace:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
Inspection Report 335/86-18 and 389/86-17

Florida Power & Light Company has reviewed the subject inspection report, and pursuant to the provisions of 10 CFR 2.201 the response is attached.

There is no proprietary information in the report.

Very truly yours,

[Signature]
for C. O. Woody
Group Vice President
Nuclear Energy

COW/GRM/gp

Attachment -

cc: Harold F. Reis, Esquire

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PDR ADOCK 05000335
Q PDR

IEA

Re: St. Lucie Units 1 and 2
Inspection Report 335/86-18 and 389/86-17
L-86-405

ATTACHMENT

ITEM A

During the Nuclear Regulatory Commission (NRC) inspection conducted on June 17 - August 4, 1986, a violation is listed below:

Unit 1 and 2 Technical Specification (TS) 6.8.1.a, states, written procedures shall be established, implemented and maintained covering the activities referenced below: Applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Revision 2, February 1978, Appendix "A", states in part, the following are typical safety-related activities that should be covered by written procedures; Administrative Procedures and Procedures for Startup, Operation and Shutdown of Safety-Related PWR Systems. The following system is an example that should have an operating procedure; Feedwater System.

Contrary to the above,

- a. On June 25, 1986, operating procedure (OP) 2-070020, Rev. 8, Condensate and Feedwater System - Normal Operation, was not properly established or maintained in that the procedure had numerous errors - wrong valve numbers, incorrect valve descriptions, wrong valve positions, and Unit 1 referenced components on the Unit 2 procedure. Additionally, the procedure was not implemented properly in that three valves which the procedure designated as "open" and that operators, when performing the procedure in April 1986, had initiated as "open" were found to be closed.

RESPONSE A

- 1) Florida Power & Light Company (FPL) concurs with this violation.
- 2) Deficient procedural review of the procedure requiring revision and failure by the operators involved to properly document and take action when discrepancies between procedures and actual plant conditions are found are the cause for the violation.



- 3) The subject procedure has been compared to the P & ID and a system walkdown conducted to ensure that the procedure accurately reflects plant conditions. The procedure has been revised accordingly. The subject valves were in the correct position for plant operation. This procedure was incorrect in regards to the required position; The operators have been counseled on the need for proper procedural documentation. Plant personnel responsible for the ongoing review of procedures have been reinstructed on the need to perform indepth and detailed reviews of plant procedures.
- 4) FPL feels that the above actions will be sufficient to avoid further violations in this area.
- 5) Full compliance has been achieved.

ITEM B

On July 11, 1986 Plant Administrative Procedure 0010432, Rev. 26, Plant Work Orders, paragraphs 5.1 and 8.1.1, was not properly implemented in that a plant work order (PWO) was not issued for a deficiency on a plant system (190 foot wind direction remote instrument) which had been identified in the plant "Out-of-Service" log on July 9.

RESPONSE B

- 1) Florida Power & Light Company (FPL) concurs with this violation
- 2) FPL believes that the operators involved thought that verbal notification to the Maintenance Department eliminated the need for a written plant work order.
- 3) A plant work order was written for this item per Administrative Procedure (AP) 0010432.
- 4) A night order has been issued to the Operations Department reiterating the requirements listed in AP 0010432. FPL feels that the above actions will be sufficient to prevent recurrence.
- 5) Full compliance has been achieved.

