



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

Report No.: 50-335/79-06

Licensee: Florida Power and Light Company

Facility Name: St. Lucie Unit 1

Docket No.: 50-335

License No.: DPR-67

Inspection at St. Lucie Site

Inspector: *E. H. Webster*
E. H. Webster

4/3/79
Date Signed

Approved by: *F. S. Cantrell*
F. S. Cantrell, Acting Section Chief, RONS

4/3/79
Date Signed

SUMMARY

Inspection on February 12-16, 1979

Areas Inspected

This routine unannounced inspection involved 33 inspector-hours onsite in the areas of licensee event reports, Facility Review Group activities, IE Bulletins and Circulars, containment purge controls, design changes and modifications, and non-routine event reporting program.

Results

Of the six areas inspected, no apparent items of noncompliance or deviations were identified in five areas; two apparent items of noncompliance were found in one area (infraction - failure to complete a written safety evaluation of a modification to a system described in the FSAR - paragraph 9a; infraction - failure to review and approve a maintenance retest procedure - paragraph 9b).

2247 056

7906230013

DETAILS

1. Persons Contacted

Licensee Employees

- *C. M. Wethy, Plant Manager
- *J. H. Barrow, Operations Superintendent
 - C. A. Wells, Operations Supervisor
- *A. J. Collier, Instrument Control Supervisor
- *R. R. Jennings, Technical Department Supervisor
 - L. W. Pearce, Plant Supervisor, Nuclear
- *N. G. Roos, QC Engineer
 - D. J. St. John, Plant Supervisor, II
 - F. J. Frechette, Acting Chemistry Supervisor
- *A. W. Barley, QA Engineer
- *H. F. Buchanan, Health Physics Supervisor

Other licensee employees contacted included technicians, and operators.

*Attended exit interview.

2. Exit Interview

The inspection scope and findings were summarized on February 16, 1979 with those persons indicated in Paragraph 1 above. The two items of noncompliance discussed in paragraph 9.a. and b. were acknowledged by licensee management. The licensee stated that action to locate necessary documentation, discussed in paragraph 9.c. as an unresolved item, was in progress.

3. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Items (335/78-23-01): Licensee evaluation of environmental qualifications of electrical components inside containment. The inspector provided a copy of IE Bulletin 79-01 "Environmental Qualification of Class IE Equipment" dated February 8, 1979 to licensee management. Since this bulletin requires response by mid-June, 1979 to the same action request as in IE Circular 78-08, this unresolved item and a related open item (335/79-01-04) are closed. The issue shall remain open administratively, by the IE Bulletin tracking system and shall be reviewed by the inspector in future inspections.

4. Unresolved Items

Unresolved items are a matter about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. One new unresolved item identified during this inspection is discussed in paragraph 9c.

2247 057

5. Plant Status

At the time of this inspection, St. Lucie Unit 1 was operating at 100% rated power.

6. Containment Purge Controls

A letter from NRR to FP&L dated November 29, 1978, requested information concerning bypass circuitry for containment purge systems and an evaluation of containment purge operations. In letters dated January 5, and February 1, 1979, FP&L responded to all questions and committed to complete an evaluation of the purge valves operation for specific analyzed accidents by August 1, 1979. The inspector verified the controls detailed in the licensee's letters. 1978 gas release records indicated containment purge operations for only 84 hours. All but two purges were conducted just prior to maintenance outages. The licensee appears to have adequate control of purging operations and appears to minimize containment purging as much as possible. The inspector had no further questions in this area.

7. Facility Review Group (FRG) Activities Review

The inspector reviewed the licensee's Administrative Procedure (AP) 0010520 and FRG minutes to verify that the onsite safety committee reviewed activities and documents as prescribed in Technical Specifications, met at required frequency, and that membership for specific meetings was appropriate for the material covered. The inspector reviewed FRG minutes from December 1, 1978 to January 30, 1979. In the minutes for the 14 meetings, involved membership listings indicated more than two designated alternate members present on four occasions. Since this appeared to be in noncompliance with Technical Specification (T.S.) 6.5.1.3, the inspector interviewed three FRG members and two designated alternate members to assess the method of approval by the FRG. Licensee personnel confirmed that FRG approval of procedures unanimous agreement, making the use of extra alternate members have no impact on the intent of the T.S. in deciding technical issues. The inspector confirmed that a minimum of three members were present at each FRG meeting, regardless of the number of alternates and that all alternates listed were designated in writing. Licensee personnel committed to changing AP 0010520 to reflect the approval procedure presently in use. This area remains open pending review of the revised procedure (335/79-06-01).

No items of noncompliance or deviations were identified.

8. Review of Licensee Event Reports

a. Written Report Review

The following thirty-day LERs were reviewed in-office to determine whether reporting requirements had been met, the report assessed the event and identified the cause, and corrective action was appropriate. Except as indicated, the inspector had no further questions:

- (1) LER 78-11, Supplement dated August 8, 1978 reported the cause

of the broken in-core instrument thimbles found April 15, 1978.

- (2) LER 78-16, dated June 9, 1978. An open item (335/78-17-03) was initiated pending licensee request for a T.S. change to Table 2.2-1. The licensee requested that change by letter to NRR dated January 8, 1979.
- (3) LER 78-44, dated December 20, 1978, concerning inoperability of valve MV-07-1B.
- (4) LER 78-46, dated January 5, 1979 concerned a control element assembly (CEA) drop. Due to the frequency of CEA drops, the inspector will review the system used by the licensee to report problems that may be generic to Combustion Engineering (CE) systems, to assure followup by CE (335/79-06-02).

b. Written Report Review and Followup Onsite

In addition to performing a report review as defined in a. above, site followup was performed for these LERs to determine whether the corrective action specified had been taken, the licensee had reviewed the event, whether it involved an unreviewed safety question or violation of regulations or whether a corrected LER was submitted, if required:

- (1) LER 78-10, dated July 14, 1978 reported one channel of steam generator low pressure measurement failing due to a faulty power supply. As discussed in IE inspection report 335/78-15, the licensee has approved a design change, designated PC/M 413-78, to replace the power supplies during the upcoming refueling outage. The inspector will verify completion of PC/M 413-78 (335/79-06-03).
- (2) LER 78-30, dated September 8, 1978 reported failure to complete a required chemistry analysis following a plant trip. The inspector verified administrative controls exist to preclude recurrence. The inspector had no further questions in this area.
- (3) LER 78-41, dated November 17, 1978 reported inadvertent interruption of shutdown cooling due to improper clearance removal. The inspector completed the review initially reported in IE inspection report 335/79-01, by reviewing Operating Procedure (OP) 0010122, revision 6, and the subject clearance order number 10-171 dated October 28, 1978. The inspector verified the revised procedure was adequate to preclude recurrence.

No items of noncompliance or deviations were identified.

9. Design Changes and Modifications

2247 059

The inspector reviewed the design change/modification areas to verify that changes were made and documented in accordance with 10 CFR 50.59, reviewed and approved in accordance with T.S. and QA/QC controls, and conducted using formal, approved procedures. For the seven changes selected, the inspector verified that documentary evidence was available onsite to support their conformance to design change requirements. Design inputs, encompassing codes, standards, regulatory requirements, and design bases were verified. The test and acceptance criteria stipulated in the design change procedures were reviewed as to their status and adequacy. The final modified equipment performance was reviewed and approved indicating their conformance to Technical Specifications. Additionally, operating procedures and as-built drawings affected by the selected design changes were reviewed to verify their up-to-date revision status.

The specific changes reviewed were:

- a. PC/M 446-78 and associated Plant Work Order (PWO) 7437 dated March 16, 1978. The change to the Thermal Margin/Low Pressure (TM/LP) pretrip (alarm) setpoint from 100 PSI above the trip setpoint to 50 PSI above the TM/LP trip setpoint was completed on November 2, 1978.

The TM/LP pretrip function is described in the Final Safety Analysis Report (FSAR) section 7.2.1.2(g) and the pretrip setpoint of 100 psi above the trip setpoint listed in the FSAR table on page 7.2-13. The safety evaluation required by 10 CFR 50.59(b) was completed on September 20, 1978, but did not specifically address the three bases specified in 10 CFR 50.59(a)(2) to be used to determine whether the change represented an unreviewed safety question. The assumption used that the TM/LP pretrip function serves only for an alarm, appeared to make this evaluation complete. However, FSAR section 7.2.1.2(g) on page 7.2-14b details that the TM/LP pretrip also functions to cause a CEA withdrawal prohibit as well as an alarm. This control function was not analyzed as required by 10 CFR 50.59 nor was a written evaluation documented. This is in noncompliance with 10 CFR 50.59 (335/78-06-04).

- b. PC/M 359-78 and associated PWO 7178 dated December 2, 1977. This modification during a CEA block circuit test panel to the existing cabinet wiring was completed November 8, 1978. The change package reviewed by the FRG did not include the PWO nor the attached retest procedure consisted of 11 steps involving step-by-step operation of the new switch, removing leads and checking safety-related indications.

Technical Specification 6.8.2 requires the FRG approve applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33 section I.1 lists "maintenance that can affect the performance of safety-related equipment..."

The lack of approval of the retest procedure to PC/M 359-78 represents noncompliance with T.S. 6.8.2 (335/79-06-05).

- c. PC/M 493-78 and associated PWO 0931 dated November 7, 1978. This

2247 060

modification to a safety injection tank (SIT) brace was completed on November 9, 1978. The inspector noted that this modification was completed during a plant outage five days prior to FRG approval, on November 14, 1978. Licensee management could not explain this occurrence, but felt it was exceptional to insure the modification did not extend the shutdown. The inspector noted that the maintenance did not affect operability of the SIT while the plant was in Mode 5 and that the FRG approval occurred prior to changing plant modes, alleviating the safety concern in this case. However, the inspector will review other modifications to assure that no other examples exist indicating loss of modification program control (335/79-06-06)

Further review by the inspector revealed the absence of QA documentation of the plate material used in this change. The PWO required 5/8 inch plate material A 515 material specified as grade 70, class III be used for the brace flanges, but the licensee was unable to find the documentation of the material used. This item will remain unresolved pending review of the documentation of these plates (335/79-06-07).

- d. PC/M 314-77 dated October 14, 1977. This change required a Technical Specification change which has been forwarded to the Company Nuclear Review Board (CNRB) for approval. The inspector had no further questions in this area.
- e. PC/M 421-78 dated April 30, 1978. The inspector had no comments in this area.
- f. PC/M NNS 475-78 dated September 1, 1978. The inspector had no comments in this area.
- g. PC/M NNS 410-78 and associated PWO 6908 dated April 4, 1978. This change did not effect safety related equipment and was checked only to verify licensees modification program controls.

The inspector had no further questions in this area.

The inspector noted from the above reviews that documentation on the PC/M forms of completion of appropriate drawing and procedure changes, training and CNRB review was often three months or more behind completion of the change activity. The inspector shall review a larger sampling of changes to determine the extent of this problem in future inspections (335/79-06-08).

10. IE Bulletin 78-01, Retainers for Contact Arms on CP-120 Relays

The subject bulletin was discussed in IE Report 335/78-09 and left open pending licensee action to replace the Celcon retainers in the subject contact arms. The inspector reviewed the licensees documentation in this area and verified the replacement retainers are on hand and that PWOs, number 4187 through 4195, are written to conduct the work during

the upcoming refueling outage. The inspector shall followup on completion of these PWOs in future inspections (335/79-06-09).

11. IE Circulars and Notices

a. IE Circulars

The inspector verified licensee receipt of the following IE Circulars, distribution to appropriate supervisors, review for applicability and action taken or proposed:

- (1) IEC 78-18, UL Fire Test dated November 6, 1978. This circular was issued for information only and was routed accordingly to appropriate fire protection engineering personnel.
- (2) IEC 79-02 Failure of 120 Volt AC Power Supplies dated January 16, 1979. This circular was routed and assigned for review by March 1979, the inspector will followup in this area in future inspections when the review results and proposed action, if any, are available.

b. IE Notices

NRC Information Notices are a new communications mean whereby NRC provides early notification of a possibly significant matter to licensees. The inspector verified that the licensee has received and distributed the following notices:

- (1) IEN 79-01 Bergen-Paterson Hydraulic Shock and Sway Arrestors dated February 2, 1979.
- (2) IEN 79-03 Limitorque Valve Geared Limit Switch Lubricant dated February 9, 1979.

12. Non-routine Event Reporting Program

The inspector reviewed Administrative Procedure 0010721, "NRC Required Non-Routine Reports" and discussed non-routine event reporting functions with Licensee management. The licensee appears to have adequate administrative controls for prompt review and evaluation of operations and maintenance oriented events. The inspector will review corrective action controls and administrative controls on vendor bulletins in future inspections.

2247 062