

USNRC REGION II  
ATLANTA, GEORGIA

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December 28, 1981  
L-81-542

Mr. James P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:WPK  
St. Lucie Unit 2  
Docket No. 50-389/81-05

In accordance with the December 17, 1981 request from Mr. Bill Kleinsorge of your staff, this supplementary response describes additional site implementing actions taken to assure that measures are established and implemented to control storage and preservation of material and equipment to prevent damage or deterioration. This response covers scaffolding supported by pipe and the preventive maintenance program during the turnover transition phase.

To provide verification that no scaffolding is to be erected and supported by pipe that is under a 4" pipe size, all personnel were again instructed to this effect and in addition they were notified that the completed scaffold request must bear the signature of either the Foreman, the General Foreman, or the Supervisor. Examples of improper scaffolding found during inspection 50-389/81-05 have been identified to the Senior Resident Engineer to determine if any degradation occurred. Additionally, Quality Assurance will continue to perform surveillances in all areas to provide additional assurance that the controls are working.

The preventive maintenance required during the turnover transition phase was clarified in a meeting held on December 22, 1981. The meeting minutes show that all responsible parties are aware of their responsibilities and will improve implementation of the procedure. No site procedures require modification since they already outline the maintenance program during the turnover transition phase. On December 23, 1981, this program was presented to the Area Directors and Quality Assurance by the Senior Resident Engineer and the Construction Superintendent. The items were discussed at the referenced meetings and are summarized as follows:

1. Review of Preventive Maintenance requirements for equipment.

It was emphasized that any cognizant party can request a modification to Preventive Maintenance requirements. This can be done by letter memo to Process Control. Process Control will then submit these requests with applicable

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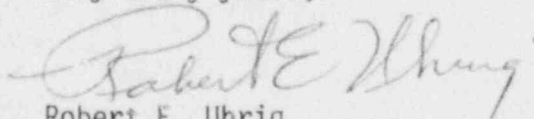
detail to the Senior Resident Engineer for review. Upon approval, the required changes will be made to the Preventive Maintenance sheets and distributed for implementation. Modifications to the Preventive Maintenance Program are necessary as the equipment is moved from storage in the warehouse to its permanent field location.

2. Review of the implementation program for all preventive maintenance.

SQP-23 (Preventive Maintenance) defines how preventive maintenance is performed from the time of equipment delivery until turnover and acceptance by Florida Power & Light. This acceptance by Florida Power & Light is defined as acceptance by Power Resources Plant Manager and documents the formal acceptance of the system or systems.

SQP-23 states that the Construction Superintendent/Area Directors are responsible for coordinating all preventive maintenance activities and assuring that they are performed. All preventive maintenance requirements along with required dates will continue to be sent to the Construction Superintendent/Area Directors by Process Control. To preclude any misunderstanding, it was re-emphasized that the Construction Superintendent/Area Directors are responsible for assuring that all maintenance is performed and records are sent to Process Control. For equipment that has been green tagged, Start-up (Electrical) agreed to perform the required meggering and Start-up (Mechanical) agreed to perform shaft rotations as required. They will advise the Construction Superintendent if they are unable to perform all the work. The intent is to do this with Start-up personnel. If this is not possible, Start-up will assure the equipment is tagged out for construction to perform the maintenance. Full implementation of these actions will be complete by January 15, 1982. Examples of specific motors found uncovered but with external heaters during inspection 50-389/81-25 were identified to the Senior Resident Engineer to determine effects of this exposure.

Very truly yours,



Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/DME/ah

cc: Harold F. Reis, Esquire