

USNRC REGION II  
ATLANTA, GEORGIA



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June 21, 1982  
L-82-256

Mr. James P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 300  
Atlanta, Georgia 30303

Re: RII:WKK  
St. Lucie Unit 2  
Docket No. 50-389/82-12

Dear Mr. O'Reilly:

Florida Power & Light Company has reviewed the subject Inspection Report which identifies the following deviation; "Design and Installation of Fire Protection Yard Piping System are not Specified to Meet the Requirements of NFPA-24". Attached is our response to this deviation.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/PPC/cab

cc: Harold F. Reis, Esquire

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Deviation:

FSAR Appendix 9.5.A Section 7.E.2(a) states that the guidelines of National Fire Protection Association (NFPA) Standard 24, Code of Protection, will be used in the design and installation of the fire protection yard main loop.

Contrary to the above, NFPA-24 was not used in the design and installation of the fire protection yard piping system.

Response:

The Fire Protection System yard piping is designed and installed in accordance with the guidelines of the National Fire Protection Association Standard 24, dated 1973. NFPA-24 does not contain sufficient detail and information to design fire protection piping. For this reason the construction documents refer to ANSI Standard B31.1 for design purposes only. However, Florida Power and Light agrees with the deviation in that we did not follow the guidelines of NFPA-24 for hydrostatic testing.

Section 9903 of the standard requires that the Fire Protection System yard piping be hydrostatically tested at least to 200 psi pressure for two hours with the amount of leakage measured. The inspector found eighteen (18) sections of the yard piping which were not hydrostatically tested in accordance with the guidelines of NFPA-24. In order to correct this deviation Florida Power and Light has issued a Field Change Request (FCR #2-8064E) which will ensure that future hydrostatic tests will be performed to the requirements of the applicable NFPA Codes. In addition, Florida Power and Light is currently reviewing the subject tests to confirm compliance with the provisions of NFPA-24. The portions of the system which were improperly tested, are now being retested to the guidelines of the Code.

As of this date eight (8) sections have been retested to the guidelines of the Code. The verification program is being performed in conjunction with testing of new construction and will, therefore, be complete by August 15, 1982.

Additionally, while performing a design verification, Florida Power and Light has found that some of the thrust blocks installed did not meet the intended design requirements. The necessary thrust block modifications will be completed by October 20, 1982.