

REGION II  
ATLANTA, GEORGIA



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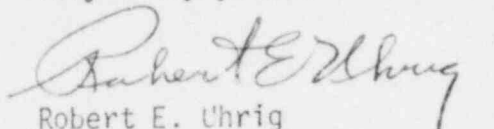
Mr. James P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

RE: RII:WHM  
St. Lucie Unit 2  
Docket No. 50-389/82-23

Dear Mr. O'Reilly:

Florida Power & Light Company has reviewed the subject Inspection Report which identified the following deviation: "Failure to Fully Implement QA Requirements of QP 2.12". Please find attached 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

Deviations:

Florida Power and Light Company's (FPL) approved Topical Quality Assurance Report, Revision 4, Appendix E identifies FPL's Procedure QP 2.12 as the applicable procedure for implementation of a Quality Assurance Program for Fire Protection Systems.

Contrary to the above, a site quality assurance program for the fire protection systems had not been fully implemented.

Response:

As stated in the deviation the elements of the Florida Power and Light Quality Assurance Program that apply to Fire Protection Systems necessary to protect areas containing safety related equipment are identified in Quality Procedure QP 2.12. The level of quality assurance effort applied to each element of the program is determined by the implementing FP&J department. This determination is based upon the importance of the equipment or service to fire protection in areas containing safety related equipment and includes all actions required to ensure that the fire protection system will perform its function in these areas.

At St. Lucie Unit 2 levels of quality assurance effort applied to construction are outlined in site quality procedures and in Quality Control quality instructions. To ensure that the elements of the FPL QA program applicable to the installation of fire protection systems are clearly delineated, a draft site quality procedure, SQP-99, has been prepared on Fire Protection Systems. This draft procedure outlines the quality controls applicable to the installation of fire protection systems by listing each FPL quality procedure, each site quality procedure and each quality instruction in terms of the applicable elements of the FPL Quality Assurance Program. For example, all materials received at the site are processed by Stores as outlined by SQP-3, Material Control, with receiving responsibilities outlined in QP 8.1, Identification and Control of Materials. Quality Control uses QI 10.78, Integrity Testing, to inspect systems required to be hydrostatically tested. In this manner a compilation of all applicable quality controls are presented. SQP-99, Revision 0 was issued on July 9, 1982.

Quality Assurance has reviewed and commented on this draft procedure and the overall QA program will be improved by its issuance. Audit requirements applicable to fire protection continue to be fulfilled by Quality Assurance.

With regard to QA program effectiveness, we feel that the FPL QA program has always been and will continue to be effectively implemented in all safety related areas of construction at St. Lucie Unit #2. However, we realize that certain changes such as clarification of existing procedures and/or issue of singular procedures to place emphasis on certain facets of the QA program are needed from time to time to add that extra degree of program effectiveness which is our ultimate goal at FPL. Thus, with the issuance of SQP-99, as noted in the previous discussion, we feel that this extra degree of QA program effectiveness will be accomplished with respect to the fire protection system.