



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos. 50-335/82-42 and 50-389/82-64

Licensee: Florida Power and Light Company
9250 West Flagler Street
Miami, FL 33101

Facility Name: St. Lucie 1 and 2

Docket No. 50-335 and 50-389

License Nos. DPR-67 and CPPR-144

Inspection at St. Lucie site near Ft. Pierce, FL

Inspector: P. H. Skinner 12/27/82
P. H. Skinner Date Signed

Approved by: C. M. Upright 1/10/83
C. M. Upright, Section Chief Date Signed
Engineering Programs Branch
Division of Engineering and Operational Programs

SUMMARY

Inspection on December 6-10, 1982

Areas Inspected

This routine, unannounced inspection involved 32 inspector-hours on site in the areas of previous enforcement matters, maintenance programs, test and experiments programs, and licensee action on previously identified inspection findings.

Results

Of the four areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *A. Anderson, Quality Assurance Engineer
- A. Bailey, Quality Assurance Supervisor
- D. Dalton, Technical Staff Engineer
- *R. Dawson, Startup Supervisor
- J. Luke, Quality Assurance Engineer
- N. Roos, Quality Control Supervisor
- *J. Wall, Quality Control Engineer
- C. Wilson, Mechanical Maintenance

NRC Resident Inspector

- *S. Elrod, Sr. Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on December 10, 1982, with those persons indicated in paragraph 1 above. The licensee acknowledged the following inspection finding:

- Inspector Followup Item 389/82-64-01, Requirement for 10 CFR 50.59 Reviews of Testing

3. Licensee Action on Previous Enforcement Matters

- a. (Closed) Violation (335/82-15-01): Failure To Store Training Records In Cabinets Meeting 1-Hour Fire Ratings. FP&L's response dated September 8, 1981, was considered acceptable by Region II. A review of various department training records indicate that storage of training records is being provided by the site vault with duplicate copies being kept in safes that meet the 1-hour fire rating requirement.
- b. (Closed) Violation (335/82-03-01): Failure To Implement Procedures - Multiple Examples. FP&L's response dated May 20, 1982, was considered acceptable by Region II. QI-5PR/PSL-1, Preparation, Revision, Review/Approval of Procedures, was revised to correct deficiencies in the preparation and use of maintenance and other procedures. The Quality Control Supervisor also conducted training on the revised procedure and on conduct and adherence to procedures for all maintenance department personnel.

- c. (Closed) Violation (335/82-03-02): Failure To Adequately Document Work Performed On Safety-Related Components. FP&L's response dated May 20, 1982, was considered acceptable by Region II. The corrective action addressed in item 3.b above also applies to this violation.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Maintenance Program (62702, 35743)

- References:
- a. FPL-NQA-100, Topical Quality Assurance Report, Revision 5
 - b. Regulatory Guide 1.33 Revision 2, Quality Assurance Program Requirements (Operation)
 - c. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

The inspector reviewed the licensee's maintenance program required by references (a) through (c) to verify that activities were conducted in accordance with regulatory requirements and industry guides or standards. The following criteria were used during this review:

- Required administrative approvals were obtained prior to initiating the work.
- Limiting conditions for operation were met while the components were removed from service.
- Approved procedures were used when the activity appeared to be beyond the skill of the craft.
- Activities are required to be accomplished by qualified personnel.
- Written procedures were established for initiating work requests for emergency and preventive maintenance.
- Criteria and responsibilities for review and approval of maintenance requests were established.
- Criteria and responsibilities for designating the activity as safety or non-safety-related were established.
- Criteria and responsibilities were designated for performing inspection or maintenance activities.

- Methods and responsibilities were designated for performing functional testing of structures, systems, or components following maintenance work and/or prior to their being returned to service.
- Responsibility to assemble and review maintenance records for transfer to record storage has been established.
- Procedures are in use to control cleaning of safety-related components and systems.
- Procedures have been developed to assure as systems are turned over, they will be placed into a control program for preventive and corrective maintenance.

The documents listed below were reviewed to verify that previously listed criteria had been incorporated into licensee's maintenance activities:

- Quality Procedure (QP) 2.3, Cleanliness Control Methods, Revision 3
- QP 2.10, Housekeeping Operating Plants, Revision 0
- QP 2.11, Housekeeping Construction Sites, Revision 0
- QP 11.2, Test Control-Operation, Revision 1
- Site Quality Procedure (SQP) -23, Preventive Maintenance, Revision 1
- SQP-64, Turnover and Inspection Status, Revision 14
- SQP-101, Construction and Startup Interface for Systems Turnover, Revision 0
- Quality Inspection (QI)-5PR/PSL-1, Preparation, Revision, Review/Approval of Procedures, Revision 20
- QI-11 PR/PSL-1, Test Control, Revision 4
- QI-13 PR/PSL-2, Cleanliness Control Methods, Revision 4
- QI-15PR/PSL-2, Discrepancy Correction and Modification During Construction and Testing, Revision 9
- Administrative Procedure (AP) No. 000421, Preliminary and Conditional Acceptance of System By FP&L Power Resources, Revision 6
- AP 0010123, Administrative Control of Valves, Locks and Switches, Revision 33
- AP 0010125, Schedules of Periodic Tests, Checks and Calibrations, Revision 48

- AP 0010430, Maintenance on Nuclear Safety-Related or Seismic Class I Systems, Revision 6
- AP 0010431, Preventive Maintenance Program, Revision 3
- AP 0010432, Plant Work Orders, Revision 19
- Startup Department Letter of Instruction No. 0-6, Jurisdiction of Systems During Startup, Revision 2

Within this area, no violations or deviations were identified.

6. Test and Experiments Program (37703, 35749)

- References:
- a. 10 CFR 50.59, Changes, Tests, and Experiments
 - b. FPL-NQA-100, Topical Quality Assurance Report, Revision 5
 - c. Technical Specifications, Section 6.5, Review and Audit
 - d. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

The inspector reviewed the licensee's test and experiments program required by references (a) through (d) to verify that activities were conducted in accordance with regulatory requirements, industry guides or standards, and Technical Specifications. The following criteria were used during this review:

- A method has been established to handle all requests or proposals for conducting special tests involving safety-related components.
- Special tests will be performed in accordance with approved procedures.
- Responsibilities have been assigned for reviewing and approving special test procedures.
- A system, including assignment of responsibility, has been established to assure that special tests will be reviewed.
- Responsibilities have been assigned to assure that a written safety evaluation required by 10 CFR 50.59 will be developed for any special test to assure that it does not involve an unreviewed safety question or change in Technical Specifications.

The documents listed below were reviewed to verify that previously listed criteria had been incorporated into the licensee's test and experiments activities:

- TQR 11.0, Test Control, Revision 0
- TQP 11.1, Test Control Construction, Revision 2
- TQP 11.2, Test Control Operation, Revision 1
- TQP 11.4, Test Control Program, Revision 4
- QI 5-PR/PSL-1, Preparation, Revision, Review/Approval of Procedures, Revision 20
- QI 11-PR/PSL-1, Test Control, Revision 5
- AP 00105201 Facility Review Group, Revision 9

Within this area, one inspector followup item was identified. Reference (a) requires that the licensee maintain records of tests and experiments carried out pursuant to paragraph (a) of 10 CFR 50.59 and that those records shall include a written safety evaluation which provides the bases for the determination that the test or experiment does not involve an unreviewed safety question or a change to the Technical Specifications. Since the reviewed documents listed above did not address this area and this requirement does not become effective on Unit 2 until the operating license is issued, this area will be tracked as an inspector followup item (389/82-64-01) pending licensee review of this area and a subsequent inspection to assure that the requirements c. reference (a) have been met.

7. Licensee Action on Previously Identified Inspector Findings

(Closed) Open Item (335/82-03-03): Facility Review Group of Maintenance Instructions. All Plant Maintenance Instructions have been reviewed by the Facility Review Group.