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August 13, 1982
L-82-350

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

Dear Mr. O'Reilly:

Re: RII:MDG
St. Lucie Unit 2
Docket No. 50-389/82-29

Florida Power and Light Company has reviewed the subject inspection report which identified the following violation: "Inadequate In-place Storage of Electrical Penetrations". Mr. M. D. Hunt, the inspector, found two examples where Florida Power and Light Company violated 10 CFR 50, Appendix B Criterion V. Attached is the response for both examples.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/RS/cab

cc: Harold F. Reis, Esquire

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Violation: Inadequate In-place Storage of Electrical Penetrations

10CFR 50, Appendix B Criterion V as implemented by FP&L Topical Quality Assurance Report number 5 requires that activities affecting quality shall be accomplished in accordance with instructions and procedures. SQP-31-8.4.1 requires housekeeping at in-place storage locations conform with the appropriate zone cleanliness classification.

Contrary to the above, on June 21, 1982, activities affecting quality were not met in that:

- A. Terminal blocks for electrical penetrations E-3, C-2, E-7 D-7 and D-8 were not covered to provide protection from construction activities; and
- B. A box containing electrical penetration modules was not covered and the box was being used as a work bench for concrete repair work being performed in the area.

This is a Severity Level V Violation (Supplement II.E).

Response: Example A

- 1. FP&L does not agree. At the time of the NRC Inspection, the permanent covers for the electrical penetrations were removed to allow access for termination. At the end of each work day, they are covered with "Sil-temp" to provide protection from fire and foreign material. In addition, they are thoroughly cleaned on a bi-weekly basis.

All Supervisors, General Foreman, Foreman and craftsmen are instructed to cover penetrations as soon as the task for which they were uncovered has been completed.

Response: Example B

- 1. FP&L agrees with the findings.
- 2. Craftsmen were in Violation of SQP-31. The penetration modules were being installed by feeding them thru the openings provided from the Reactor Containment Building to the Reactor Auxiliary Building, via the RCB Annulus area. During the time this activity was in progress, the cement finisher entered the room and started his work. The box just happened to be convenient for use as a work bench.

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3. This condition was immediately corrected and brought to the attention of the Civil Superintendent who instructed his craftsman against a recurrence of this practice. The Electrical Supervisor also instructed his craftsmen against leaving such materials and equipment unattended.
4. Supervisors and Foremen have been instructed to carefully supervise craft personnel pursuant to all provisions of SQP-31.
5. We are currently in full compliance.