NEC PEGESTOIA

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November 3, 1982 L-82-481

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: St. Lucie Unit 1 Docket Nos. 50-335 IE Inspection Report 82-29

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

Very truly yours,

Robert E. Uhrig Vice President

Advanced Systems & Technology

REU/PLP/cab

Attachment

cc: Harold F. Reis, Esquire

## ATTACHMENT

Re: St. Lucie Unit 1 Docket No. 50-335

IE Inspection Report 82-29

## Finding:

Technical Specification 6.8.1 requires that written procedures shall be implemented. Administrative Procedure 0010123, Administrative Control of Valves, Locks and Switches, specifies that certain valves important to safety shall be locked in their proper position. Additionally, Operating Procedure 0010122, Revision 15, In-plant Equipment Clearance Orders, requires that when issuing or releasing a clearance the Watch Engineer shall insure that applicable valves, locks and switches under administrative control are properly denoted on the order and that equipment under administrative control shall be listed as locked open or locked closed (L. Open or L. Closed).

Contrary to the above, completed equipment clearances for August and early September 1982 included eight clearances which contained safety-related valves, identified in AP-0010123, that had not been specified as "locked open or locked closed" upon release of the clearance. This is a repeat of violation 50-335/82-15-01.

## Response:

- 1. FPL concurs with the finding.
- The finding was the result of the relatively new requirement to denote on the clearance request the administrative control status of a valve, lock, or switch, and the inexperience of many of the newly qualified/promoted individuals required to implement this policy.
- The clearance orders affected were immediately corrected upon identification of the problem.
- 4. All operations personnel were re-instructed by memo (Night Order) of the need to designate "locked open" or "locked closed", as appropriate, on the clearance orders.
- 5. Full compliance was achieved on September 8, 1982.