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FPL

FLORIDA POWER & LIGHT COMPANY

August 10, 1983
L-83-442

James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street NW, Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 2
Docket No. 50-389
Inspection Report 83-44

Florida Power & Light Company has reviewed the subject inspection report, and responses to findings A and B are attached. Our response to finding C and to the comment in the cover letter concerning the root cause of the problems will be submitted by August 24, 1983.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/RJS/lmg

Attachment

cc: Harold F. Reis, Esquire

ATTACHMENT

RE: ST. LUCIE UNIT 2
DOCKET NO. 50-389
INSPECTION REPORT 83-44

FINDING A

10 CFR 50, Appendix B, Criterion XV, as implemented by Florida Power and Light (FPL) Topical Quality Assurance Report Number 5.0, requires that nonconforming items be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedure. FPL procedure SQP-21, Corrective Actions, requires that the NCR Review Board review inspection reports documenting discrepant conditions to determine if the discrepant conditions warrant an engineering review.

Contrary to the above, the NCR Review Board determined that discrepant conditions identified on inspection report numbers MH83-0896 and MH83-0898 were acceptable with no additional work required where, in fact, these discrepant conditions required an engineering review to determine if the discrepancies were acceptable.

RESPONSE

1. FPL concurs with the finding.

2. The reason for the finding was incomplete documentation to support the findings of the NCR Review Board. The Board, at the time that it was considering the subject inspection reports, requested additional information about the deficiencies to properly evaluate them. The site welding superintendent inspected the deficient welds in the field and presented a verbal report to the Review Board. The Board also reviewed documentation supplied by the vendor who performed the welding. Neither the examination by the welding superintendent nor the relevant sections of vendor paperwork were documented to support the Board disposition of the deficiencies "use-as-is".

3. As corrective action, an inspection team of construction engineers, welding engineers and QC personnel was assembled. The team re-inspected, in detail, the two subject whip restraints plus other similar restraints supplied by the same vendor (RE-MS 1, 4, 12, and 13). The results of the re-inspection were documented on inspection report MH83-3935 and forwarded to the NCR Review Board for disposition. The Board requested an engineering review of the noted weld deficiencies. This review was performed with respect to the original design calculations and found that the deficiencies were negligible. The restraints were determined to be acceptable. The engineering calculations supporting this disposition are on file at Ebasco/New York.

3. (continued)
In addition, a review was performed of 10% of the approximately 2500 inspection reports dispositioned by the NCR Review Board as "use-as-is". The review was performed by three task groups (Mechanical, Civil and Electrical) composed of individuals who had not served on the NCR Review Board. Each task group was headed by a QA auditor and representatives from FPL Power Plant Engineering, QC, Construction and Ebasco Services. The results of the review uncovered no significant hardware deficiencies, nor were the task group dispositions of individual IRs different from the original NCR Review Board dispositions.

4. In order to prevent a recurrence of the problem identified, SQP-21, Corrective Actions, has been revised so as to require that an NCR be initiated for any deficiency identified which requires an engineering review. Individual inspection reports are no longer sent to the NCR Review Board. All NCRs are dispositioned by Engineering in writing, with sufficient documentation to support the disposition.

5. Revision 11 to SQP-21 was issued July 15, 1983. Full compliance has been achieved.

FINDING B

10 CFR 50, Appendix B, Criterion V, as implemented by FPL Topical Quality Assurance Report Number 5.0, requires that activities affecting quality be prescribed by documented instructions, procedures or drawings and be accomplished in accordance with these instructions, procedures or drawings. Paragraph 5.7 of FPL procedure QP 10.2, Inspection of Plant Construction, requires that hold points be used when witnessing inspections that must be performed and signed off before work can proceed.

Contrary to the above, work proceeded past hold points during modification of masonry wall numbers 57 and 58 in the auxiliary building. Hold points bypassed were those requiring verification of location of thru bolts, verifying that wall reinforcing steel was not damaged during drilling of thru bolt holes and verification that bolt materials were specified, including witnessing of transfer of bolt marking cut from stock length.

RESPONSE

1. FPL concurs with the finding.

2. The finding occurred due to the failure of construction supervisory personnel to notify Quality Control when the Hold Points were reached.

3. As corrective action, Quality Control performed a follow-up inspection of the walls, documented on IR C-83-1562. Variation from design location of bolts in wall #58 was noted on this report. Engineering evaluation accepted the as-built locations as acceptable. The location of bolt holes in wall #57 was found to be acceptable. The remaining inspections on these walls were accomplished per procedure.

4. As corrective action to prevent future problems, the responsible craft supervisor was instructed in the necessity for notification of QC for all Hold Points and the requirement that work not continue until the required inspection is performed.

   Construction has issued a memo (FM2-83-5428) to all civil supervisory personnel detailing the importance of QC Hold Point inspection and identifying the proper channels for notification in the Construction Backfit mode.

   Construction QC has also initiated a closer surveillance of all block wall modifications in progress.

5. Full compliance has been achieved and will be followed under the Backfit Program.