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May 23, 1984  
L-84-135

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

Dear Mr. O'Reilly:

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335, 50-389  
Inspection Report 84-9/12

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

There is no proprietary information in the report.

Very truly yours,

*for J. W. Williams, Jr.*  
J. W. Williams, Jr.  
Group Vice President  
Nuclear Energy

JWW/PLP/js

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-84-179

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PDR ADOCK 05000335  
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## ATTACHMENT

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335, 50-389  
Inspection Report 84-9/12

### Finding

10 CFR 50 Appendix B Criterion V as implemented by the licensee QA Program (FPL-NQA-100A, Revision 5), requires that activities affecting quality shall be prescribed by procedures and accomplished in accordance with these procedures:

1. OP 17.1, The Collection and Storage of Quality Assurance Records for Nuclear Power Plants, Revision 11, Paragraph 5.3.1 delineates record storage requirements. These include such requirements as a description of the storage area, type of filing system to be used, and rules governing access to and control of the files. These are representative and not all inclusive.

Contrary to the above, OP 17.1 requirements have not been established for record storage at satellite locations.

2. OP 17.1, Paragraph 5.3.b, states that protection of QA records from Fire shall meet the requirements of the 232 NFPA-1974 Code by approved fire resistant cabinets.

Contrary to the above, although QA records are stored in one-hour fire resistant cabinets, the adequacy of these cabinets has not been calculated as required by 232 NFPA-1974.

### Response

- 1) FPL concurs with the finding.
- 2) FPL had considered that adequate controls existed for these temporary files.
- 3) FPL is presently preparing instructions for temporary storage files which will meet the requirements of the Quality Assurance Manual. These instructions are expected to be in place by July 31, 1984.

The FPL Quality Assurance Record Storage Evaluation Team, (QARSET) will perform a Fuel Load Calculation, estimating combustibles in Temporary Document storage areas not having fire suppression protection. This will include satellite areas and locations utilizing insulated record containers, fire resistant safes and insulated filing devices. As a basis for this calculation the QARSET shall use the estimating techniques suggested in NFPA 232 1975 Section 543. This calculation estimate will be performed and completed at the St. Lucie Facility by June 30th 1984.

In the past the QARSET has considered documents stored in these filing devices as important working documents and used these areas for the compiling of the final Q.A. Record package thus protecting these documents until Q.A. Record Authentication. QP 17.1 will be revised to address Temporary record storage areas and locations as well as correcting reference to the proper year NFPA Code. This is expected to be complete by November 30, 1984.

- 4) See Paragraph #3
- 5) See Paragraph #3