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July 2, 1984
L-84-168

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

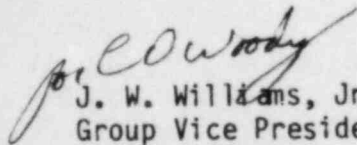
Dear Mr. O'Reilly:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
Inspection Report 84-12/84-14

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,


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

JWW/NWG/js

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-84-224

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ATTACHMENT

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
IE Inspection Report 84-12/84-14

Finding 1

The following violations were identified during an inspection conducted on April 23-27, 1984. The Severity Levels were assigned in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C).

1. 10 CFR 50, Appendix B, Criterion XII and the accepted QA Program (FPL-NQA-100A), TQR 12.0, require that measures be established to assure that measuring devices used in activities affecting quality are properly controlled and calibrated to maintain accuracy within necessary limits.

Contrary to the above, measures have not been established to assure that appropriate gauges are properly controlled and calibrated. Unit 2 component cooling water pump suction gauges were not included in the calibration control program and Unit 1 and Unit 2 charging pump suction gauges were not being calibrated. These permanently installed gauges are used to determine performance characteristics required by the facility Technical Specifications and Section XI of the ASME Code. These examples are not intended to be an all-inclusive list of problems that may exist in the program established to control measuring and test equipment. Your response should address actions taken to assure that all measuring and test devices used in activities affecting quality are properly controlled, calibrated, and adjusted to maintain accuracy.

Response

- a) FPL concurs in the finding.
- b) Personnel oversight.
- c) The gauges identified have been calibrated.
- d) A review is being conducted to ensure all instruments used to determine compliance are properly calibrated and are included in the periodic calibration program.
- e) Expected completion of the above is August 31, 1984.

Finding 2

10 CFR 50, Appendix B, Criterion XVIII and the accepted QA Program (FPL-NQA-100A), TQR 18.0, require a comprehensive system of planned and periodic audits to verify compliance of all aspects of the quality assurance program and to determine the effectiveness of the program. FPL-NQA-100A, Appendix C, commits to Regulatory Guide 1.144 which endorses ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants. This standard in Section 4.3.2.3 requires that selected elements of the quality assurance program be audited to the depth necessary to determine whether or not they are being implemented.

Contrary to the above, Audit QSL-OPS-83-288 conducted during August 1983, was not performed to the depth necessary to verify all surveillance elements on Unit 1 and 2.

- a. Audit checklist item 6 requires verification that a master schedule exists which reflects the status of all planned surveillance testing. The auditor evaluated this item as satisfactory based on the review of a single Unit 1 procedure (1-0010125). Unit 2 has a similar procedure that was not reviewed. Different procedures are used to control surveillance activities involving chemistry, health physics, fire protection, and mechanical maintenance requirements; the program elements described in these procedures were not evaluated during this audit.
- b. This audit evaluated the calibration program required by 10 CFR 50 Appendix B Criterion XII and TQR 12.0 and concluded that calibration activities were satisfactory. As indicated by Violation No. 1 above, all required measuring and test devices have not been placed in the calibration program.

Response

- a) FPL concurs in the finding.
- b) Auditor oversight.
- c) Auditor instructed on assuring adequate depth of programmatic audits.
- d) An audit will be conducted of M & TE by Quality Assurance Department subsequent to review being conducted per Finding 1. above.
- e) Expected completion of the Quality Assurance Department Audit is September 30, 1983.