

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power and Light Company
St. Lucie 1 and 2

Docket Nos. 50-335 and 50-389
License Nos. DPR-67 and NPF-16

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 gages are properly controlled and calibrated. Unit 2 component cooling water pump suction gages were not included in the calibration control program and Unit 1 and Unit 2 charging pump suction gages were not being calibrated. These permanently installed gages 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.

This is a Severity Level IV violation (Supplement I).

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 Unit 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.

This is a Severity Level IV Violation (Supplement I).

Pursuant to 10 CFR 2.201, you are required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) admission or denial of the alleged violations; (2) the reasons for the violations if admitted; (3) the corrective steps which have been taken and the results achieved; (4) corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved.

Security or safeguards information should be submitted as an enclosure to facilitate withholding it from public disclosure as required by 10 CFR 2.790(d) or 10 CFR 73.21.

Date: JUN 1 1984