UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

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Report Nos.: 50-335/84-12 and 50-389/84-14

Licensee: Florida Power and Light Company
9250 West Flagler Street
Miami, FL 33101

Docket Nos.: 50-335 and 50-389

License Nos.: DPR-67 and NPF-16

Facility Name: St. Lucie

Inspection at St. Lucie site near Ft. Pierce, Florida, and corporate offices in Miami and Juno Beach, Florida

Inspectors: G A Belisle — 5/24/84
G. A. Belisle — Date Signed

C M Upright for — 5/25/84
L. E. Foster — Date Signed

Approved by: C M Upright — 5/25/84
C. M. Upright, Section Chief — Date Signed
Division of Reactor Safety

SUMMARY

Inspection on April 23 - 27, 1984

Areas Inspected

This routine, unannounced inspection involved 64 inspector-hours on site in the areas of procurement; receipt, storage, and handling of equipment and materials; surveillance testing and calibration control; independent inspection effort; and licensee actions on previously identified inspection findings.

Results

Of the five areas inspected, no violations or deviations were identified in four areas; two apparent violations were found in one area (Failure to include gages in calibration program, paragraph 7.a; Failure to audit to necessary depth, paragraph 7.b).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*A. Bailey, QA Operations Supervisor
J. Baysinger, QA Engineer
G. Becker, QC Engineer
*J. Bilder, Purchasing
J. Brannin, Technical Staff Engineer
*W. Coutier, Senior QA Engineer
*T. Dillard, Maintenance Supervisor
J. Dwyer, QC Engineer
R. Englemeir, Manager of Quality Assurance
J. Harper, Assistant Manager of Quality Assurance
S. Jackson, Supervising Procurement QA Engineer
*R. Jennings, Technical Staff Manager
C. Laisure, QA Engineer
C. Leppla, T&C Supervisor
R. Marsh, Manager of QA Procurement and Reliability
C. Moore, QC Inspector
F. Panzanio, Supervisor Purchasing
T. Quillen, QC Inspector
N. Roos, QC Supervisor
*D. Sager, Operations Supervisor
K. Schoneck, Audit Clerk and File Custodian
A. Siebe, Manager of Nuclear Fuels
K. Van Oeveren, Supervising QA Engineer, Procurement
D. Van Tassell, Jr., Manager Plant Electrical Engineering
*J. Walls, QC Engineer
*N. Weems, QA Superintendent
*C. Wilson, Assistant Plant Superintendent, Mechanical

Other licensee employees contacted included technicians, operators, and office personnel.

NRC Resident Inspector

*C. Feierabend, Senior Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on April 27, 1984, with those persons indicated in paragraph 1 above. The licensee acknowledged the following inspection findings:

Violation 335/84-12-01, 389/84-14-01: Failure to Include Gages in Calibration Program, paragraph 7.a.

Violation 335/84-12-02, 389/84-14-02: Failure to Audit to Necessary Depth, paragraph 7.b.

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Procurement Program (38701)

References:

(a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants

(b) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Revision 2

(c) ANSI N45.2-1971, Quality Assurance Program Requirements for Nuclear Power Plants

(d) Regulatory Guide 1.123, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

(e) ANSI N45.2.13-1976, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants

(f) ANSI N18.7-1976, Quality Assurance for the Operational Phase of Nuclear Power Plants

(g) Florida Power and Light Topical QA Report

(h) FSAR Section 17.2, Quality Assurance for Station Operation

(i) FSAR Section 3.2, Classification of Structures, Systems, and Components, Amendment 10

The inspector reviewed the licensee procurement program required by references (a)-(i) to determine if the procurement program was being conducted in accordance with regulatory requirements, industry guides and standards, and commitments made in the application. The following criteria were used during this review:

- Administrative controls have been established to assign departmental responsibilities for procurement activities.

- Administrative controls have been established to identify safety-related equipment, supplies, consumables, and services to be procured under the QA program.

- Controls have been established to provide measures and assign responsibilities for the preparation, review, approval, and changes to procurement documents.

- Procedures have been established for qualifying and maintaining a current list of approved vendors, suppliers, and contractors.

- Procedures have been established to assure that vendors, contractors, and suppliers conform to procurement and quality assurance document requirements, industry standards and codes, and that nonconformances are properly reported and corrected.

- Controls have been established to provide for audits and surveillances of vendor and supplier facilities and for witnessing acceptance tests.

The documents listed below were reviewed to verify that the above criteria had been incorporated into the licensee QA program to control procurement of safety-related items and services:

TQR 4.0	Procurement Document Control, Revision 1
TQR 7.0	Control of Purchased Items and Services, Revision 2
QP 4.1	Control of Requisitions and the Issuance of Purchase Orders for Spare Parts, Replacement Items, and Services, Draft Copy of Revision 16
QP 4.2	Evaluation of Contractor Bids - Technical, Revision 3
QI 4 QAD 1	Quality Assurance Review of Procurement Documents, Revision 4
QCN 6S	Quality Requirements on Elastomers
QI 7-PR/PSL-2	Control of Purchased Material, Equipment, and Services, Revision 6

QAP-84-318 Transmittal of Book Containing the Approved Suppliers List (ASL), dated April 2, 1984

QAP-84-320 Supplemental Package for Revised ASL, dated April 2, 1984

QAP-81-649 Procurement of ASME Section III Code Material, Revision 2

QAP-83-337 Use of Certified Mill Test Reports and Certificates of Compliance, Revision 2

QAP-84-175 Sales Offices Approvals and Restrictions, dated April 2, 1984

Purchasing Department Quality Instruction Manual, Issue No. 16

Fuel Resource Quality Instructions (QI-FRNs)

QA Approved Suppliers List (Book), dated April 2, 1984

Procurement documents were reviewed and discussions were held with licensee personnel associated with procurement activities. The licensee had procedures for the control of procured materials, suppliers, and services. Procedures had been developed and were being implemented to ensure that only QA approved vendors, suppliers, and service organizations are used for the St. Lucie plant. Areas inspected and documents reviewed included the following:

Purchasing Department Document Control Room (Juno Office)

QA Department Document Control Room (Miami Office)

Audit Plan for Auditing C-E Fuel Fabrication

Fabrication Schedule for Fuel (1984)

Letter from FP&L to Combustion Engineering (C-E) dated April 16, 1984, Fuel Fabrication and Inspection of Reload Fuel for Unit 2

P. O. Package (RPA-421659) for Ex-Core Neutron Flux Monitoring System

P. O. 35186-39482P, Repair of Circuit Board dated April 25, 1984

Bid Package Review Minutes between EBASCO, FP&L, and bidder dated February 4, 1984

Exceptions to EBASCO Inquiry No. FLO-2200-51 dated January 20, 1984

P. O. 93359 - 59800B, Snubber Testing

NCR No. 6291-1064R resulting from Vendor Examination of Parts

NCR No. 6291-1078, No Identification Tag

QA/QC Coordinators April Meeting Notes, Revision of QAP-4.1

The Quality Assurance Procurement and Reliability Section maintains a vendor/supplier history file located in the Corporate Office. These files contain information on the licensee's annual review, initial evaluation, purchase order activity, audit plans, checklists, questionnaires, audit and surveillance results, and associated responses from the suppliers. The inspector observed that the individual history file folders had sections for entering problems encountered with suppliers and their products (or services); however, these sections of the folders only had a minimal amount of information concerning nonconformance reports, deviation from specifications, receiving inspection findings, problems encountered (contractural, fabrication, design, operational documentation), and the resolution of these problems. The merits of including the above information in the history files were discussed with QA Supervisors, QA Engineers, Plant Engineers, and the Purchasing Supervisor. A formal method to ensure that all pertinent information is transmitted to all cognizant QA groups had not been developed; therefore, complete comprehensive information on vendors may not be used effectively.

The QA Procurement and Reliability Section had developed and were maintaining the Approved Suppliers List (ASL). Weekly updates to the ASL are accomplished by supplements. Recently, the format of the ASL has been changed from a continuous computer sheet to individual sheets for each approved verdor, supplier, distributor, and sales office. Recipients of these controlled sheets kept them in a three-ring binder which complimented easy updating of the ASL.

The licensee also approves and places restrictions (as applicable) on all distributors and sales offices prior to procuring safety related material. Data folders on vendors, suppliers, distributors, and sales offices were being stored by the QA department in fire resistant safes prior to being microfilmed. Examination of safes revealed that the Approved Vendor and Conditionally Approved Vendor Folders were in separate safes and the folders were color coded for easy identification. The inspector examined several vendor folders to confirm that they were being maintained and that they contained pertinent information justifying approval. Some of the typical approved vendor folders examined are listed below:

Vendor/Supplier	Evaluation/Audit
Borg-Warner Corporation	March 15, 1984
Reynolds Aluminum Supply Company	February 21 - 22, 1984
Unistrut Florida, Incorporated	February 28 - 29, 1984
Josyln Manufacturing Company	March 27, 1984
Ingersoll-Rand Company (Sales Office)	March 12, 1984
Bergen Patterson Pipe Support	May 25, 1983

The following vendor folders marked conditionally approved were examined:

American Air Filter Company
Bechtel Power Corporation
Combustion Engineering
Fluorcarbon Corporation
Pipe Shields, Incorporated

Surveillance Reports on the following vendors were reviewed:

Crosby Valve and Gage Company	-	March 12, 1984
Kimball Electronic Laboratory	-	April 17, 1984
Wylie Laboratories	-	March 5 - 7, 1984
Pa. Steel Foundry	-	April 2, 1984
Rockwell International	-	March 26, 1984

The inspector was advised that the QA Procurement and Reliability Section requires that all personnel who review procurement documentation be given a special training course, Procurement Document Reviewer Training Course. At present, 13 reviewers have taken this training in addition to their regular training in regulations, codes, standards, and procedures. Two recent hires are presently taking this training. In order to qualify as a spare part document reviewer, the QA personnel are required to take a special concentrated course. The Purchasing Department utilizes findings resulting from the QA/QC Coordinator review of procurement documents to up-grade the training of purchase agents. Problems encountered with vendors and corrective actions are being logged by the Purchasing Department and are being sent to the QA Procurement and Reliability Section for evaluation and use during vendor surveillances and audits. The merit of submitting this information to other QA, QC, and engineering groups was discussed.

The inspector observed a Procurement Document Reviewer performing a review of a large purchase order package which contained documentation from the original inquiry to the acceptance of the successful bidder. The final contract approval will depend upon the reviewer's findings.

Within this area, no violations or deviations were identified.

6. Receipt, Storage, and Handling of Equipment and Materials (38702)

References:
(a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants

(b) 10 CFR 50, Part 21, Reporting of Defects and Noncompliance

(c) Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants

(d) ANSI N45.2-1972, Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants

(e) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), Revision 2

(f) ANSI N18.7, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

(g) FP&L Topical QA Report

(h) FSAR Section 17.2, Quality Assurance for Station Operation

The inspector reviewed the licensee program and procedures required by references (a)-(h) to verify that controls have been established and were being implemented for receipt inspections, initiation of nonconformance reports, disposition of nonconformances, handling, storage, and issue of safety-related equipment. The following criteria were used during this review:

- Administrative controls have been established for conducting and documenting receipt inspections and reporting nonconformances.

- Administrative controls have been established for disposition of items, marking, storing, and protection of items during storage.

- Administrative controls have been established for limited shelf-life items and for performing audits and surveys of storeroom activities.

The following licensee documents were examined to verify that the licensee had prepared and was implementing procedures to control receipt inspections, handling, storage, maintenance, and protection of reactor plant items:

Operating Procedure 1610020, Receipt and Handling of New Fuel

QP 7.1, Receipt Inspection of Materials, Parts and Components for Operating Plants, Revision 5

TQR 7.0, Control of Purchased Items and Services, Revision 2

QI-7-S-1, Control of Purchased Material, Operating Stores, Revision 8

QI 7-PR/PSL-2, Receiving Inspection, Revision 10

Other licensee procedures associated with receipt, storage, and handling of equipment were reviewed in detail during a recent inspection; therefore, are not referenced in this inspection report.

Several purchase orders (P.O.s) and associated documentation reviewed verified that the licensee (receiving inspection, QC, and QA) is taking action to ensure that only approved compounds, cleaners, scale removers, and other consumables are used at the St. Lucie plant. Material being procured under P.O. 94100-66747 had been sent to the licensee's chemical laboratory for evaluation and approval. Material received under P. O. 38041-79698W (elastomers) had Hold Tag No. 13570 issued due to the lack of complete documentation (compound name, cure date, and shelf-life) as required by the P.O. Further examination of the P.O. package revealed that the vendor had replied to the documentation nonconformance on April 5, 1984, and supplied the material name, cure date, and shelf-life date thus resolving the receiving inspection nonconformance.

The inspector observed the control of weld rods at the tool room. Six ovens are located outside the tool room. These oven doors were secured with padlocks, each oven had a calibrated thermometer and the contents of the ovens were identified. Observations during two days did not reveal any discrepancies in storeroom weld rod control.

The inspector accompanied a QC inspector during the resolution of a spare part being procured under M&S 763-61275-2 from Consolidated Controls. The part in question was identified as a commercial part number and was identified by the manufacturers number instead of a Consolidated Controls number. Receiving inspection would not accept the part (Report 10930 - Form 3900) until the discrepancy was resolved. Resolution was completed by the QC inspector by researching microfilm records (Reel 3680, Frame 1947) and then comparing records with a part in the storeroom. The decision was also made that this part could be bought as commercial grade. Based on the above observation, the licensee's control system appeared to be adequate.

Other completed P.O.s with associated receiving inspection reports, certificates of conformance, material certifications, UT results, and vendor tests were examined in the QA Record Vault. P.O.s examined were 15035 - 22214W and 0279430-001. These P.O.s had been microfilmed and were waiting microfilm proof reading prior to filing.

Other observations were that the QA Records Vault personnel were knowledgeable of their responsibilities, operated the computer effectively, and found information in a timely manner. The temperature and humidity of the vault were continuously recorded by a calibrated instrument.

Within this area, no violations or deviations were identified.

7. Surveillance Testing and Calibration Control (61725)

References: (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants

(b) Regulatory Guide 1.33, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

(c) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

(d) Technical Specifications (TS)

The inspector reviewed the licensee surveillance testing and calibration control program required by references (a)-(d) and verified that these activities were conducted in accordance with regulatory requirements, industry guides and standards, and Technical Specifications. The following criteria were used during this review:

- Administrative controls have been established for surveillance, calibration, and inservice inspection activities required by TS which includes frequency, personnel responsibility, and surveillance status.

- Administrative controls have been established for maintaining surveillance scheduling current.

- Administrative controls have been established for updating scheduling based on TS or license revisions.

- Administrative controls have been established to assure that surveillance, calibration, and inservice inspections are performed in accordance with approved procedures including acceptance criteria.

- Administrative controls have been established for data review and evaluation.

- Administrative controls have been established for responsible personnel to assure that required surveillance schedules are adhered to.

- Administrative controls have been established for equipment calibrationnot specifically required by TS which includes frequency, personnel responsibility, and calibration status.

- Administrative controls have been established for maintaining calibration scheduling current.

- Administrative controls have been established to assure that calibrations are performed in accordance with approved procedures including acceptance criteria.

The documents listed below were reviewed to verify that these criteria had been incorporated into licensee administrative procedures to control surveillance testing and calibration control activities:

1-0010125, Schedule of Periodic Tests, Checks and Calibrations, Revision 58

2-0010125, Schedule of Periodic Tests, Checks and Calibrations, Revision 10

2-0960060, 125VDC Periodic Maintenance and Tests, Revision 4

1-1400064, Installed Plant Instrumentation Calibration, Revision 22

2-1400064,Installed Plant Instrumentation Calibration, Revision 2

0010127, Reactor Engineering Schedule of Periodic Tests and Reports, Revision 9

0010132, ASME Code Testing of Pumps and Valves, Revision 4

0010139, Fire Protection Schedule of Periodic Tests and Reports, Revision 0

1400065, Maintenance and Calibration of Plant Instrumentation and Control Equipment, Revision 6

0010437, Schedule of Mechanical Maintenance Surveillance Requirements, Revision 14

QI 11-PR/PSL-4, Instrument and Control Test Control, Revision 10

QI 12-PR/PSL-7, Calibration of Installed Plant Instrumentation and Control Equipment, Revision 3

QI 10-PR/PSL-5, Technical Specification Surveillance Inspection of Reactor Building, Revision 3

QI 10-PR/PSL-3, Inspection Instruction for Class 1, 2 and 3 Piping and Components, Revision 2

QI 10-PR/PSL-4, Plant Inservice Inspection, Revision 4

QI 16-PR/PSL-1, Corrective Action, Revision 13

QI 18-PR/PSL-2, Quality Control Surveillances, Revision 9

EV-01, Schedule for Periodic Testing, Revision 3

C-01, Schedule for Periodic Tests, Revision 11

HP-4, Scheduling of Health Physics Activities, Revision 17

QP 11.2, Test Control - Operation, Revision 2

QP 12.2, Calibration Control of Installed Plant Instrumentation and Control Equipment, Revision 1

The inspector selected 22 TS surveillance requirements and verified that they were being procedurally controlled and performed at the required frequency. The following TS surveillances were selected:

4.1.1.1	4.3 - 5.2.a
4.1.2.1	4.3 - 8.2.a
4.1.2.3	4.4.1.3.2
4.1.2.5	4.4.1.3.3
4.1.2.7	4.4.3
4.1.2.8.b	4.4.6.2.a
4.3 - 1.3	4.4.6.2.b
4.3 - 1.13	4.5.4.b
4.3 - 2.3.c	4.6.1.4
4.3 - 3.2.c.IV	4.7.7.1.e.1
4.3 - 4.4.a	4.9.8.2

The TS selected for review included the following frequencies; once per shift, twice per day, once per day, weekly, monthly, and during refueling (18 months).

The inspector verified that a relatively recent change (Amendment 57) had been incorporated into TS 4.7.7.1.e.1. The inspector selected gages from Procedure 2-0010125, data sheets 12-22, and similar data sheets from Procedure 1-0010125 and verified that these gages were incorporated into the calibration control program.

The inspector reviewed Audit QAO-PSL-83-288 issued September 8, 1983. This audit reviewed licensee surveillance and calibration programs.

Within this area, two violations were identified and are discussed in the following paragraphs.

a. Failure to Include Gages in Calibration Program

The inspector selected gages from procedures 1-0010125 and 2-0010125 and verified that these gages were included in the licensee calibration program. These gages were not safety-related but are used to measure pump inservice inspection requirements of ASME Section XI. The specific gages were associated with boric acid pumps 2A and 2B; charging pumps 2A, 2B, and 2C; intake cooling water pumps 2A, 2B, and 2C; and component cooling water pumps 2A, 2B, and 2C. Similar gages were reviewed for Unit 1 components. The intake cooling water level is read from a wall measurement scale consequently no calibration is performed. The inspector identified that Unit 2 component cooling water pump suction pressure gages (PX-14-27A, B, and C) and Unit 1 and Unit 2 charging pump suction gages (PIC 2224X, Y, and Z) are not included in the calibration program. Calibration data was not available for the charging pump suction gages. It was determined that two component cooling water pump suction gages (A and B) had been calibrated on January 9, 1984, and March 30, 1983, but it could not be

exactly determined who performed these calibrations. The C pump suction gage did not have a calibration sticker.

Discussions with licensee personnel identified that charging pump suction gage data may not be needed to meet code requirements. However, additional discussions with an ISI engineer indicated that the suction pressure data was needed to identify improper pump operation. Licensee personnel could not determine why these gages were not in the calibration program.

The failure to include these gages in the calibration program constitutes a violation (335/84-12-01, 389/84-14-01). These examples are not intended to be all-inclusive and may indicate a much broader problem regarding the measures used to establish the calibration control program.

b. Failure to Audit to Necessary Depth

The inspector reviewed Audit QAO-PSL-83-288 issued September 8, 1983. This audit scope was defined as a management audit of PSL-1 and 2 activities to verify the Nuclear Energy Department implementation of the applicable requirements of the FP&L QA Program in the areas of 10 CFR 50, Appendix B, Criteria 11, 12, 14, and 17 as addressed in seven Quality Assurance procedures (QP 11.2, 11.3, 11.4, 12.1, 12.2, 14.1, and 17.1). The audit subject was test and calibration control and QA records storage. One of the specific activities to be audited was calibration and control of installed plant instrumentation and control equipment. The audit checklist in items 6, 42, 43, and 44 states those calibration program aspects to be verified by the auditor. In these items the auditor's comments do not accurately represent the full program scope. Checklist item 6 addresses whether or not a master surveillance schedule has been established which reflects the status of all planned surveillance testing. The auditor evaluated this area as satisfactory based on a review of one Unit 1 procedure (1-0010125). This procedure contains a large percentage of Unit 1 surveillance testing; however, the surveillance program is divided among various plant disciplines. Those other discipline procedures were not included and Unit 2 procedures were not included. Similar narrow reviews were performed for checklist items 42-44. This audit was described to the inspector as being a program audit as opposed to an implementation audit. This failure to audit all programmatic aspects of the calibration and surveillance program to the depth necessary constitutes a violation (335/84-12-02, 389/84-14-02).

8. Independent Inspection Effort (92706)

a. Reactor Head Instrumentation Modification Review

One portion of Design Change PC/M 108-83 was an in-core instrumentation (ICI) and reactor pressure boundary modification. To determine acceptability, a hydro and ICI tube QC inspection for leakage was

required. The inspector accompanied two QC inspectors and HP monitor to observe their inspection activities. Prior to the inspection, the inspector questioned the QC personnel about the following work aspects:

Prerequisites for job performance

Procedural controls for job performance

Specific QC training given for various job performances

Procedural controls if job failed acceptance criteria

Expected job performance time requirements and if any preplanning was specifically needed

Prior to entering the work area, the inspector observed that the QC personnel verified radiation work permit requirements and dressed accordingly. Prior to beginning the ICI inspection, the QC inspector verified that plant pressure parameters were being maintained as required by procedural controls. After the ICI inspection, the QC inspector again verified plant pressure parameters were acceptable. During the actual ICI inspection, HP closely monitored inspection activities. Before leaving the work area, one QC inspector performed a minor work area cleanup.

Within this area, no violations or deviations were identified.

b. Startup Testing Audit QSL-OPS-84-312

During Unit 1 startup testing, an audit was being performed of reactor engineering activities as detailed in Procedures 1-011052 and 1-0010133. This was an activity audit to verify that specific steps in these procedures were being performed. The inspector questioned the auditor about the following audit activities:

Auditor qualifications and training

Approved audit checklist usage and who specifically made up and approved the checklist

Auditor actions if reactor engineering personnel did not follow procedures

If reactor engineering personnel were using the correct procedures and how the auditor verified this

Reactor engineering personnel, although busy, were receptive and helpful in answering the auditors' questions.

Within this area, no violations or deviations were identified.

9. Licensee Actions on Previously Identified Inspection Findings (92702)

(Open) Inspector Followup Item (335/84-09-05 and 389/84-12-05) Program to Control the Use of Aerosols. The licensee had prepared a draft procedure, Chemical Control Guidelines, which was reviewed by the inspector. The review revealed that most of the controls were only considering the effects of chemicals on steel components and piping. One area mentions the approved use of a certain material (lubricant) for "O" ring installation applications. The guideline does not mention degradation and permanent damage that can be done to manmade materials (plastics, nylons, bakelites, rubber, and other elastomers) if the use of petroleum products, hydraulic fluid, turbine governor oil, aerosol spray can material (including freon), and detergents are not controlled. This degradation can occur on breakers, switches, seals, cable, and a multitude of plant electrical and mechanical items which are safety related and are outside the C-E (NSSS) primary and secondary components and piping systems. Fluid, air, and decontamination systems are also subject to degradation if unknown elements or unapproved materials are used in close proximity. Disposition of rinse water, cleaning detergents, plus residues are not addressed in the document. This item will remain open until the above items are considered and personnel trained or informed of the potential plant degradation which could result from the use of uncontrolled and unknown materials.