

REGION II
ATLANTA, GEORGIA



DEC 10 A8:35

December 4, 1984
L-84-360

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

Dear Mr. O'Reilly:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
Inspection Report 84-25/27

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

At the request of your staff, our response to this report was held until we had the opportunity to review Inspection Report 84-39/31.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. Williams, Jr.", written in a cursive style.

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

JWW/PLP/js

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-84-435-1

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PDR ADDCK 05000335
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ATTACHMENT

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
Inspection Report 84-25/27

Finding 1

10 CFR 50, Appendix B, as implemented by the licensee's Topical Quality Assurance Report TQR 2.0, Quality Assurance Program paragraph 2.2.3 requires in part that the control over activities affecting the quality of safety-related structures, systems, and components shall be to the extent consistent with their importance to safety. Such control shall include use of appropriate equipment, establishment of suitable environmental conditions, and assurance that all prerequisites for a given activity have been satisfied.

Contrary to the above, control of activities was not sufficient to prevent damage to safety-related electrical cables during removal of flamastic fire barrier on August 20, 1984.

Response

1. FPL concurs with this finding and with the additional example in Inspection Report 84-39/31.
2. The personnel involved did not recognize the difficulty of the task nor the high potential for damaging cables and as such did not provide adequate controls. In addition these personnel failed to follow written precautions.
3. As corrective action, the personnel who failed to follow the initial precautions were given disciplinary action. Specific instructions were issued which included precautions, required tools, supervision coverage restrictions on the amount of simultaneous work, additional inspections, and identification of cables in the vicinity of the barrier material being removed. This has reduced the probability of damage and allowed easy identification of any damage should it occur.
4. FPL considers the above action will minimize any damage to cables. In addition, the personnel involved are fully aware of the problems and corrective action which should preclude further problems.
5. Full compliance was achieved on October 5, 1984.

Re: St. Lucie Units 1 and 2
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Finding 2

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for refueling operations. Technical Specification 6.8.3 allows temporary changes to such procedures provided that the intent of the original procedure is not altered; the change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected; and the change is documented, reviewed by the FRG and approved by the Plant Manager within 14 days of implementation. In addition, FPL Procedure QI5-PR/PSL-1 (Preparation, Revision, Review/Approval of Procedures) Section 5.5.3 delineates these same requirements for temporary changes to procedures after fuel loading.

Contrary to the above:

- a. A change was made to the expected dimension in paragraph 8.1.2.T of OP 2-1630022, Rev. 0, Spent Fuel Handling Machine Operation, which was performed on May 6, 1983. No approval was sought for this change.
- b. Numerous errors were found in several procedures being reviewed in preparation for the upcoming refueling of Unit 2. These procedures were:
 - OP 2-0030221, Rev. 0 - Unit 2 Initial Criticality Following Refueling
 - OP 2-0110022, Rev. 1 - Coupling and Uncoupling of CEA Extension Shafts
 - OP 2-1600023, Rev. 2 - Refueling Sequencing Guidelines
 - OP 2-1600024, Rev. 1 - Filling and Draining the Refueling Canal and Cavity

Response

1. FPL concurs with the finding.
2. The finding occurred due to personnel error and administrative oversight.
3. As corrective action, the procedures listed in the Inspection Report have been revised as a part of the Technical Specification periodic review of all Unit 2 procedures. The deficiencies noted have been corrected.
4. As in the past, we will periodically remind operations personnel of the requirements and limitations associated with the making of Temporary Changes to procedures.
5. Full compliance has been achieved as of this date.