

NOTICE OF VIOLATION

Florida Power and Light Company
St. Lucie Unit 2

Docket No. 50-389
License No. NPF-16
EA 85-50

During an NRC inspection conducted on February 25 - March 1, 1985, violations of NRC requirements were identified. The violations involved the failure to comply with NRC fire protection requirements. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the particular violations are set forth below:

1. Operating License Condition 2.c.13 requires the licensee to implement the fire protection program on a schedule specified in Section 9.5.1.11(a) and (b) of Supplement No. 3 to the Safety Evaluation Report (SSER). Fire Protection for Safe Shutdown Capability as specified in Section 9.5.1.6.A of this SSER utilizes the guidelines of Appendix R to 10 CFR Part 50. Section III.G.2. of Appendix R requires that redundant trains of systems necessary to achieve and maintain hot shutdown conditions in areas outside of containment be maintained free from fire damage by providing fire protection features in accordance with Section III.G.2.a, III.G.2.b, or III.G.2.c.

Contrary to the above, as of February 19, 1985 and without approved deviation from the required schedule, plant configurations in two areas outside of containment were not provided with adequate fire protection features which satisfy the requirements of Appendix R, Sections III.G.2.a, III.G.2.b, or III.G.2.c to ensure that systems necessary to achieve and maintain hot shutdown conditions be maintained free from fire damage. Equipment and cables for the "A" Train are located in the "B" Train switchgear room, and the "A" Train power cable for 480 volt switchgear 2A5 is routed in the "B" Train cable loft.

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

2. Technical Specification 6.8.1.f requires the licensee to implement procedures for the Fire Protection Program.

Contrary to the above, as of this inspection, two procedural errors were identified in Emergency Operating Procedure (EOP) 2-0030144, Revision 3, Alternate Shutdown, which affect implementation of EOP 2-0030144 as follows:

- a. EOP 2-0030144, step 5.8, NOTES, requires utilizing auxiliary spray (chemical and volume control system) if the reactor coolant system is greater than 200°F subcooled, and directs the manual closing of isolation valve V-2485. This action isolates the "A" Train charging path and make-up water to the reactor coolant system. However, this charging path is relied upon for make-up water as delineated in Section 5.0, Caution, which states, "If the fire is in the cable spreading room or control room, control of the reactor and other reactor components must be done utilizing "A" Train components.

- b. For a postulated fire in the control room which requires immediate evacuation with minimal operator action (e.g., reactor trip), the Pressurizer Power Operated Relief Valves (PORVs) cabling is not protected to prevent their spurious operation. EOP 2-0030144 does not contain steps to isolate the PORVs from outside the control room. Failure to isolate the PORVs could result in a significant loss in reactor coolant system inventory and pressure.

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

3. Operating License Condition 2.c.13 requires the licensee to implement the fire protection program on a schedule specified in Section 9.5.1.11(a) and (b) of Supplement No. 3 to the Safety Evaluation Report (SSER). Fire Protection for Safe Shutdown Capability as specified in Section 9.5.1.6.A of this SSER utilizes the guidelines of Appendix R to 10 CFR Part 50. Appendix R, Sections III.L.2 and 3, describes the performance goal requirements for the alternative shutdown capability and requires that procedures be in effect to implement this capability.

Contrary to the above, without approved deviation from the required schedule, EOP 2-0030144, Alternate Shutdown, was not approved for issue and use by plant personnel until September 26, 1984. The procedure was required to be implemented by April 1983 to satisfy Appendix R, Section III.L. requirements.

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

Pursuant to 10 CFR 2.201, Florida Power and Light Company is 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. Where good cause is shown, consideration will be given to extending the response.

Date: MAY 22 1985