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FLORIDA POWER & LIGHT COMPANY

August 24, 1982
L-82-371

Mr. James P. O. Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: RII:GWY
St. Lucie Unit 2
Docket No. 50-389/82-28

Dear Mr. O'Reilly:

Florida Power and Light Company has reviewed the subject Inspection Report which identified two violations.

Please find attached our responses to these violations.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PPC/cab

cc: Harold F. Reis, Esquire

RII:GWY
50-389/82-28

Violation A:

10CFR 50, Appendix B, Criterion IX as implemented by Section TQR 9.0 of FP&L Topical FPLTQAR-1-76A requires that measures be established to assure that special processes including welding are controlled. Site Quality Procedure SQP-8, Revision 3, "Storage and Distribution of Welding Filler Material", requires all unused welding filler material to be returned to the Weld Rod Control Room or bent and placed in depositories.

Contrary to the above, measures were inadequate to control welding in that during an inspection on June 21-25, 1982, four separate incidences were noted where varying amounts of unused or reusable coated welding electrodes and bare welding wire were found abandoned in and around work areas.

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

Response:

1. Florida Power & Light agrees with the findings regarding Weld Rod Control.

2. In order to investigate the root cause of the violation, an ad-hoc committee was convened by the Site Manager.
   This committee consisted of:
   1) Site Manager
   2) Project Superintendent
   3) Piping Director
   4) Welding Superintendent
   5) Project Q.C. Supervisor
   6) Q.A. Supervising Engineer

   The committee reviewed past violations and actions taken by FP&L concerning weld rod control. After a thorough review of the problem the committee concluded that the cause was failure of craft personnel to follow established site procedure SQP-8 (Site Quality Procedure - Storage and Distribution of Welding Filler Materials). In addition the committee suggested a list of actions to remedy the above situation. These actions are addressed in paragraph four.

3. Immediately following notification of the finding by the inspector, the Plant Manager initiated a site-wide clean up and inspection for residual weld materials. All unused weld meterial was gathered and properly dispositioned.

Response: (continued)

4. The following steps are being taken to prevent recurrence:

a) A craft re-education program has been initiated and will consist of the following:

i) A letter from the Site Manager to all craft personnel will be posted on the site bulletin boards. This letter will state the necessity of complying with the requirements of SQP-8.

ii) A section in the St. Lucie Unit II newsletter will be devoted to the problem of weld rod control. The article will remind craft personnel of the requirements of SQP-8 and request their full cooperation.

iii) Large signs will be posted throughout the site to serve as a constant reminder of the proper mechanism by which weld material is controlled. The signs will state the following:

Weld Rod Control

- Return unused rod to Rod Room.
- Bend damaged rod approximately 90° and place in trash containers.
- Stubs are to be placed in trash containers.

Thank You,
Site Manager

iv) Hence forth, at each weekly Shop Steward Meetings, the Craft Supervisor will reiterate and emphasize the requirements of SQP-8, Additionally, to show the seriousness of the violation, each Steward will remind each of his personnel that violation of SQP-8 will result in immediate dismissal and that the dismissed party may not be subject for re-hire.

Response: (continued)

4. b) Additional site personnel are being assigned to clean up all areas, in particulr, these laborers have been instructed to look for residual weld materials and to dispose of these materials if found. Also, a single individual has been assigned to tour all areas and report to the Welding Superintendent any violations of SQP-8.

   c) A supervisory level individual has been solely dedicated to monitor FP&L's compliance with the requirements set forth in SQP-8.

   d) A minor change is being implemented to SQP-8 to clarify the specific requirements for weld rod control.

5. Full compliance will be achieved by September 7, 1982.

Violation B:

10 CFR, 50, Appendix B, Criterion V, as implemented by Section TQR 5.0 of FP&L Topical Report FPLTQAR-1-76A, requires that activities affecting quality be prescribed by documented instructions, procedures, and drawings and be accomplished in accordance with these instructions, procedures and drawings. Paragraph 5.2.2.3 of procedure FP&L QI 10.18, the applicable procedure for hanger inspection, states that the "FINAL" Phase I inspection, when performed, will assure that installed hangers/supports are completely acceptable or document any identified deviations.

Contrary to the above, on June 21-25, 1982, hanger inspections were not accomplished in accordance with FP&L QI 10.18 in that five hangers that had received Final Phase I inspections exhibited assembly deviations that had not been documented.

This is a Severity Level V Violation (Supplement II).

Response:

1. FP&L concurs with the discrepancies found by the inspector on the five hangers identified in Report No. 50-389/82-28.

2. The discrepancies noted by the inspector indicate inadequate attention to details by the QC inspectors. The QC inspectors did not properly check hanger clamp assemblies and failed to ensure that the latest revision of the design drawings were employed for the inspections.

Response: (continued)

3. The following corrective steps were taken on the five hangers identified by the inspector.

   a) On hanger MS-4102-158 (B), nuts have been tightened and bolts now have sufficient engagement to satisfy the requirements of FCR 2-4482, Rev. 1.

   b) On hanger CC-2062-6274, DR 2109MH has been issued documenting loose nuts and insufficient thread engagement.

   c) On hanger SI-41-R1, nut has been tightened and bolt now has sufficient engagement to satisfy the requirements of FCR 2-4482, Rev. 1.

   d) On hanger CH 2081-54, DR 1878MH was issued to identify rotated clamp assembly. This discrepancy was corrected and documented on report MH 82-8924.

   e) On hanger CC-2061-63034, DR 2110MH has been issued documenting incorrect size spring can.

4. In order to avoid further similar discrepancies, Quality Control has:

   a) Requested periodic audits by Document Control of the controlled design drawings for hangers and restraints to ensure that these drawings are current and properly filed. Has changed the methods by which inspectors receive design drawings for inspection. Access to the controlled design drawings has been limited to supervisors and hanger clerks to ensure that drawings are not misfiled or lost. Additionally, this will ensure that the inspectors receive a properly xeroxed copy of the design drawing for use in the field. Hanger inspectors have been instructed in the newly instituted policy.

   b) Identified in a log, small and large bore pipe hangers with spring supports. QC will inspect all spring supports for correct cold load settings as systems are filled with water. These inspections will be documented and will encompass correct load settings, spring can size and tightness of nuts.

   c) Been conducting periodic training to update the inspector's with the latest requirements.

5. Compliance to item 4a was completed on July 28, 1982. Compliance to item 4b will be completed prior to the start of Hop-Ops. Item 4c is a continuous and on-going effort.