

USNRC REGION II  
ATLANTA, GEORGIA



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April 8, 1982  
L-82-138

Mr. James P. O'Reilly,  
Region of Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit 1  
Docket No. 50-335  
IE Inspection Report 82-04

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

There is no proprietary information in the report.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/PLP/cab

cc: Harold F. Reis, Esquire

8205040230

ATTACHMENT

Re: St. Lucie Unit 1  
Docket No. 50-335  
IE Inspection Report 82-04

Finding:

Technical Specification 6.8.1a requires that written procedures shall be established and implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. OP 0010122, Rev. 13, In-Plant Equipment Clearance Orders, requires each operation be executed in exactly the order given or to stop and request clarification before proceeding. QI 5-PR/PSC-1, Rev. 17, Preparation, Revision, Review/Approval of Procedures, requires station procedures to be adhered strickly to and states that changes shall be documented and if appropriate, incorporated in the next revision of the affected procedures.

Contrary to the above, procedures were not properly implemented in that:

- a. Clearance #1-1-118 specified five specific root valves to be closed and tagged to calibrated gages. Station procedures were not followed in that five different gage stop valves in the same line were closed and tagged from those specified. The change was not documented nor indication of clarification provided.
- b. Operating Procedure (OP) 0410020, NPSI/LPSI Normal Operation, erroneously specified closure of two valves required for post accident analysis. The valves were found properly positioned (open) by the inspector on January 27, 1982. The latest completion of OP 0410020 verified the valves to be closed. Station procedures were not followed in that no record was available to show the valve position had been changed or that a procedure revision had been submitted.

Response:

1. FPL concurs with the findings.
2.
  - a. The reason for this finding was personnel error.
  - b. The reason for this finding was a procedural oversight.
3.
  - a. As corrective action, the personnel involved have been reinstructed in the importance of full compliance with written procedures.
  - b. As corrective action, the applicable procedure has been corrected.
4. No further corrective action is considered necessary to prevent future problems.
5. Full compliance was achieved February 8, 1982.

STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     SS.

      J. A. DeMastry      , being first duly sworn, deposes and says:

That he is                      Manager, Nuclear Licensing                      of Florida Power & Light Company, the                      herein;

That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said

*J. A. DeMastry*  
J. A. DeMastry

Subscribed and sworn to before me this

  8   day of   April  , 1982

*Cheryl L. Fredrick*  
NOTARY PUBLIC, in and for the County of Dade,  
State of Florida

My commission expires: Notary Public, State of Florida at Large  
My Commission Expires October 30, 1983  
Bonded thru Maynard Bonding Agency