



May 3, 1982
L-82-174

USNRC REGION II
ATLANTA, GEORGIA
82 MAY 10 12:00

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

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Docket Nos. 50-335
IE Inspection Report 82-03

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,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig", is written over the typed name.

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/mbd

Attachment

cc: Harold F. Reis, Esquire

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ATTACHMENT

Re: St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 82-03

Finding A:

Technical Specification 6.8.1 requires written procedures to be implemented covering areas identified in Appendix "A" of Regulatory Guide 1.33. Appendix "A", Section I.5 requires general procedures for the control of maintenance, repair, replacement, and modification. Administrative Procedure (AP) 0010432, Plant Work Orders, Revision 17, addresses this requirement.

Contrary to the above, AP0010432 was not implemented in 9 out of 19 plant work orders (PWOs) selected for review as listed below:

Finding A.1

Work was initiated on PWOs 2608, 2658, 3325, and 3631 without being signed by the maintenance supervisor as required by paragraph 8.4.

Response to Item A.1

- a) FPL concurs with the finding.
- b) This finding was caused by personnel error.
- c) The responsible supervisor has been instructed to comply with instructions.
- d) See the note below.
- e) Full compliance was achieved April 12, 1982.

Finding A.2.

The lubricant used to complete PWO 1800 was not recorded as required by the procedure to verify that the correct lubricant was actually used.

Response to Item A.2

- a) FPL does not concur with the finding as stated.
- b) The instructions did not require the lubricant used to be recorded. The instruction specified the lubricant to be used under materials required.
- c) Not applicable.
- d) Not applicable.
- e) Not applicable.

Finding A.3

PWO 3643 was not revised to reflect that the emergency diesel cylinder disassembly called for in the work description was not considered necessary by the mechanic and was not completed. Approval was not obtained to deviate from the stated requirements.

Response to Item A.3

- a) FPL concurs with the finding.
- b) This finding was caused by personnel error.
- c) Personnel have been instructed on obtaining changes to plant Work Orders.
- d) See the note below.
- e) Full compliance was achieved April 12, 1982.

Finding A.4

The requirement in PW0 3631 to apply a specific bolt torque when installing pressurizer code safety valves was not met in that a slugging wrench and sledge hammer were used to tighten the flange bolts. The change to the maintenance procedure was not approved prior to making this revision. Even though not determined during the installation, a specific torque value was signed off in a QC hold point.

Response to Item A.4

- a) FPL concurs with the finding.
- b) This finding was caused by personnel error.
- c) The personnel involved have been instructed to obtain proper changes to procedures prior to proceeding with work.
- d) The subject procedure had been revised prior to the inspection.
- e) Full compliance was achieved February 1, 1982.

Finding A.5

After changing the oil, PW0s 1772, 1785, and 1800 required running the equipment to obtain bearing temperatures as verification that the proper oil had been used. Without prior approval, operators running the test deleted the requirement to obtain bearing temperatures because the routine surveillance test used to operate the equipment did not require bearing temperature measurement except during the month of June.

Response to Item A.5

- a) FPL concurs with the finding.
- b) This finding was caused by personnel error.
- c) Operations personnel have been instructed to conduct a retest in accordance with retest instructions.
- d) See the note below.
- e) Full compliance was achieved April 28, 1982.

Finding A.6

On PW0 2652, verification of Technical Specifications was not signed by an on-shift SRO as required by a procedure attached to the PW0.

Response to Item A.6

- a) FPL concurs with the finding. No violations of Limiting Conditions occurred.
- b) This finding was caused by personnel error.
- c) The responsible supervisor has been instructed to comply with instructions.
- d) See note below.
- e) Full compliance was achieved April 16, 1982.

Note: Items A.1, A.3, A.5, and A.6 - d) and e):

IE Information Notice 82-10, although specifically addressing valve repairs, emphasized the need to treat underlying problems rather than just treating the symptoms of the problem. In keeping with this concept, FPL has determined that this finding was caused not just by isolated instances of failure to follow procedure, but also by a problem of how our maintenance procedures are prepared and implemented. To treat what we have determined as the root cause, we are evaluating methods to improve the whole subject of procedural compliance.

FPL will implement the results of the above described effort by May 22, 1982.

FINDING B:

10 CFR 50 Appendix B Criterion III and the accepted QA Program TQR 3.0, Design Control, require that measures be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions and that these measures shall include provisions to assure that appropriate quality standards are specified and that deviations from such standards are controlled.

Contrary to the above, deviations from appropriate quality standards were not controlled in that a broken fastener on safety injection system restraint SI-71-6234 was repaired in accordance with Plant Work Order (PWO) 3488 dated October 16, 1982. This work required removal of a broken fastener and replacement with a 3/4" X 2 3/4" stud and double nut arrangement although the drawing (SI-971-6234-2) specifies a 3/4" X 1 3/4" long machine bolt. In addition, a procedure was not provided to perform this repair and a Quality Control inspector reviewed the PWO and approved the work description.

RESPONSE B:

- 1. FPL concurs with the finding.
- 2. Although FPL concurs with the finding FPL does not consider the problem to be associated with criterion III of Appendix B 10 CFR 50. The individuals involved had obtained engineering input and concurrence with the instructions on the PWO. This concurrence was not documented in accordance with existing instructions.

3. No specific corrective action is considered necessary.
4. This problem will be corrected as discussed above in the note to Finding A.
5. As above, corrections will be implemented by May 22, 1982.