

USNRC REGION II
ATLANTA, GEORGIA

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March 30, 1983
L-83-189

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: RII:JJL
St. Lucie Unit #2
Docket No. 50-389/83-06

Florida Power and Light Company has reviewed the subject inspection report which identified two violations.

Please find attached our response to these violations.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Robert E. Uhrig".

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/SAV/cab

8305270360 830419
PDR ADOCK 05000389
Q PDR

VIOLATION (83-06-05)

10CFR50, Appendix B, Criterion V, as implemented by Florida Power and Light (FP&L) Topical Quality Assurance Report Number 5.0, requires that activities affecting quality be prescribed by documented instructions, procedures or drawings and be accomplished in accordance with these instructions, procedures or drawings. Procedures and drawings were not followed for inspection of structural steel in the component cooling building as described below:

1. QI 10.5, requires that bolts be inspected to assure they are tightened and that the bolt and nut rest squarely.

Contrary to this requirement, inspection of the connection of member 14A12 to 9A5A and the connection of member 4A1 to 9A8 failed to detect that one bolt in each connection had not been tightened and that the bolts and nuts were not resting squarely.

2. EBASCO drawing number 2998-G-841 and other drawings referenced by this drawing require that nuts on anchor bolts through column bases be tightened to a wrench tight condition.

Contrary to this requirement, the inspector observed that nuts on anchor bolts through column numbers 1A1, 1A3, 1A4 and 1A5 were not wrench tightened.

3. QI 10.5 required that inspection of structural steel be documented on forms provided by QI 10.5.

Contrary to this requirement, inspections for structural steel connections were improperly documented on the inspection forms in that the identification of some connections inspected were erroneous on the inspection forms.

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

RESPONSE

- 1) FPL agrees with the finding.
- 2) The cause for the errors on the inspection reports has been attributed to lack of attention to detail on the part of inspection personnel coupled with poor blueprint quality on the vendor erection drawings.

The cause for the loose bolts and anchor bolt nuts is attributed to the fact that a formal final walkdown inspection and documentation review had not been performed properly on the building prior to the inspection. Inspection personnel, however, have attested to the fact that the bolts were tight when originally inspected.

Response (continued)

- 3) Both the field conditions and documentation errors noted in the inspection report have been corrected. DR 873CC was issued to document the physical discrepancies in the Component Cooling Building. This DR was closed satisfactorily on February 9, 1983.
- 4) All bolting reports from the inception of the Construction Completion Group to February 18, 1983, are presently being reviewed for accuracy and clerical errors under the direction of Quality Assurance. Reports written subsequent to this date are receiving dual review for accuracy by QC personnel.

QI 17.5 has been issued, including documented requirements for final walkdown inspections, to ensure that all work is complete in accordance with the latest revision of the design documents and that no completed work has been modified.

Inspection personnel have been reinstructed in the need for accuracy in the completion of inspection reports and additional FPL and contract supervision has been added to the Construction Completion Group.

- 5) Full compliance will be achieved by March 31, 1983.

VIOLATION (83-06-03)

10CFR50, Appendix B, Criterion V, as implemented by FP&L Topical Quality Assurance Report Number 5.0, requires activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances, and be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, the procedure developed to complete the inspections on civil structures and accomplish turnover of the civil structures were not appropriate in that:

1. Scope of inspection requirements were not defined.
2. Inspection criteria were not clear.
3. Criteria for documentation of discrepancies were not clear.

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

RESPONSE

- 1) FPL agrees with the finding.
- 2) At the inception of the Construction Completion section, it was felt that the group could operate within the parameters of existing Quality Instructions, and as such, a flowchart depicting the methods for reviewing existing records and performing required inspections was considered sufficient to provide the necessary controls.

Response (continued)

- 3) Quality Instruction JPC:QI 17.5 was developed to provide instructions for the Turnover of Civil items. The QI addresses the following steps in the verification of the completeness of Civil Construction activities.

- a) Review of existing inspection reports and the latest revision of design documents.
- b) Preliminary walkdowns to determine actual construction status.
- c) Generation of inspection work packages to include any additional inspections or reverifications to be performed.
- d) Final walkdowns to ensure that all work is complete and in accordance with the latest revision of the design documents.

In addition, it provides direction for the proper documentation of discrepancies noted during all phases of the work.

- 4) Area Quality Control supervisors have received direction in the need for development and issuance of documented instructions and/or procedures prior to the implementation of programs or inspections not covered by existing Quality Instructions or site procedures.
- 5) Full compliance is considered to have been achieved with the issuance and implementation of JPC:QI 17.5.