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February 11, 1983  
L-83-70

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

Dear Mr. O'Reilly:

Re: RII: WPA  
St. Lucie Unit No. 2  
Docket No. 50-389/82-71

Florida Power and Light Company has reviewed the subject inspection report which identified one violation. Please find attached our response to this violation.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert E. Uhrig", is written over a horizontal line.

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/PPC/njb

Attachment

8304110406 830318  
PDR ADOCK 05000389  
Q PDR

## VIOLATION

10CFR50, Appendix B Criterion V as implemented by Section TOR 5.0 of FP&L Topical Report FPL TQAR-1-76A, requires that activities affecting quality be prescribed by documented instructions, procedures and drawings and be accomplished in accordance with those instructions, procedures and drawings.

Contrary to the above, on December 7, 1982, the following examples of failure to comply with instructions, procedures and drawings were identified.

1. QC inspected and accepted pipe support SI-2407-60A included a mechanical snubber, piece 2. Bergen Patterson drawing, SI-2407-60A Rev. 6 requires the snubber to be installed perpendicular to the pipe.

Contrary to the above, the snubber was found to be installed at approximately a 78° angle from the pipe.

2. QC inspected and accepted pipe support SI-2407-67 included a rigid strut, piece 1. Bergen Patterson drawing SI-2407-67 Rev. 9 requires piece 1 to be attached to a pipe clamp 19" below the centerline of the pipe. Contrary to the above, piece 1 was found to be attached to the pipe clamp approximately 22" below the pipe centerline.
3. Bergen Patterson drawing SI-2407-84 Rev. 7 requires the bottom horizontal member, piece 3, of pipe support SI-2407 to be welded to an embedded plate with a 5/16" fillet weld all around piece 3.

Contrary to the above, support SI-2407, which had been QC inspected and accepted, was not welded to the embedded plate on a six inch length across the bottom of piece 3.

This is a severity level IV violation

## RESPONSE:

1. Florida Power & Light agrees with the finding regarding pipe support discrepancies.
2. The discrepancies are attributed to lack of attention to details during inspection.
3. The three restraints in question were inspected during the beginning of the restraint/hanger inspection program. Pipe support SI 2407-60A was inspected and documented on Inspection Report (IR) MH 81-0225, dated 8/1/81; support SI 2407-84 was inspected and documented on IR MH 81-1609, dated 9/9/81. During the early phase of this program, all inspection reports were reviewed by Office Engineering personnel for compliance with specification requirements. This requirement was included in revision 0 of procedure QI 10.18 and remained in effect until October 14, 1981 when the procedure was revised.

RESPONSE (cont'd)

3. (cont'd)

Management recognized the need for further training and indoctrination of the inspectors after they were certified and started field inspections. Consequently, periodic training classes were held with the inspectors to ensure that they understood site requirements and that common discrepancies noted during inspections were discussed to increase their effectiveness. These documented training classes were given on 11/30/81, 12/1/81, 12/2/81, 12/15/81, 1/20/82, 2/3/82, 5/10/82, 6/18/82, and 7/19/82. We feel that sufficient corrective action has been taken to ensure proper inspections.

In regards to the three specific pipe supports noted by the NRC inspector, the discrepancies were documented on non-conformance reports 5758MH, 5760MH and 5759MH.

4. In addition to the above mentioned training for QC inspectors, all safety related seismic restraints inspected during the early phase (June 22 - October 14, 1981) of the restraint inspection program were identified for additional inspection (performed during 12/10/82 - 1/17/83) based on statistical sampling in order to establish a degree of confidence in those early inspection reports.

The following attributes were used during this reinspection program:

- A. Are all weld joints welded per drawing requirements?
- B. Are specified dimensions from pipe centerline to clamp pins correct?
- C. Are specified box dimensions correct?
- D. Are rigid struts or snubbers oriented properly?
- E. Are PA/SA offset differences correct and oriented properly?

The restraint drawings were highlighted by the Mechanical QC Supervisor using the attributes as guidelines and then given to inspection personnel for verification. A group of 125 randomly selected restraints, out of a total of 700, were reinspected. The result of the reinspection showed that restraint MS 4102-6012A was improperly installed for PA/SA requirement and NCR 6202MH was issued. Restraint SI 2414-44 was originally inspected to revision 3 of the cut sheet, but revision 4 added a shim plate which required subsequent re-inspection, however, the re-inspection did not indicate any discrepancy on previously inspected items. The reinspection effort of the remaining 123 restraints indicate that they were originally properly inspected. The reinspection of early program inspected hangers indicates to a high degree of probability, that these were inspected properly.

5. Full compliance is complete.