



January 14, 1982
L-83-16

03 JAN 24 21:00

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

RE: RII:
St. Lucie Unit #2
Docket No. 50-389/82-57

Dear Mr. O'Reilly:

Florida Power and Light Company has reviewed the subject inspection report which identified the following violations: "Failure to control drawings", and "failure to correct a condition adverse to quality promptly." Please find attached our response to this violation.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

8304110415 830405
PDR ADOCK 05000335
Q PDR

VIOLATION A: FAILURE TO CONTROL DRAWINGS

10 CFR 50, Appendix B Criterion V and the accepted QA Program (FPLTOAR 1-76A, Revision 5) require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. QP 6.1, Control of Construction Project Contractor Drawings, Specifications and Procedures, Revision 1, paragraph 4.2, requires using the latest correct revision of documents for construction and installation at each project site. Additionally, paragraph 5.2.2.4 of QP 6.1 states that each recipient of a controlled document is responsible for ensuring that the latest revision is being used.

Contrary to the above, the latest correct revisions were not being used in that drawings 2998-G-46, 2998-G-3733, 2998-G-47, and 2998-G-48 in Unit 2 Control Room were the wrong revision. This was identified during an inspection of twelve control room drawings on November 17, 1982. These examples of incorrect drawings are not intended to be all inclusive but represent 33% of the sample size selected for inspection.

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

RESPONSE:

1. FP&L agrees with the finding.
2. The violation was due to failure of nuclear energy department personnel in the control room to establish a working procedure for controlling documents assigned to them.
3. The Construction Department has assigned Document Control personnel in the Control Room to assist the Nuclear Energy Department in performing their responsibilities. Document Control has replaced all controlled documents assigned to N.E.D. in the control room with current revisions.
4. Document Control now updates the drawing files and audits controlled drawings in the Control Room. We will continue to provide this service until the Control Room is turned over to the Plant Manager.
5. Full compliance has been achieved.

VIOLATION B: FAILURE TO CORRECT A CONDITION ADVERSE TO QUALITY PROMPTLY

10 CFR 50, Appendix B Criterion XVI and the accepted QA Program (FPLTQAR 1-76A, Revision 5) require that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, although measures have been established to assure conditions adverse to quality are promptly identified, one condition adverse to quality was not promptly corrected. Audit QAC-PSL-82-02 conducted January 21 - February 11, 1982, and issued February 17, 1982, identified as a finding, "Procedure CPL:QI 6.2 is not adequate as regards to description of a system to adequately control the distribution of Temporary Changes to Quality Instructions." As of this inspection (November 15-19, 1982) this item had not been resolved.

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

RESPONSE:

1. FP&L does not agree with the finding.
2. This audit item did require an inordinate length of time from initial identification until closure; however, FP&L does not consider this a true violation of the intent of 10CFR50, Appendix B, Criterion XVI (as pertaining to promptness), since it is, indeed, an exceptional case which required numerous meetings involving upper level management at the construction site and at the FPL Juno Beach and Miami offices to arrive at a satisfactory solution. Emphasis must be placed on the word satisfactory. Many solutions were offered which took time to evaluate, but only one combination of solutions was acceptable to satisfactorily resolve the problem. This was the major reason why this problem was held open for so long--the striving for a satisfactory solution. The intent of 10CFR50, Appendix B, Criterion XVI, as pertains to "prompt," is not to be prompt to the extent of settling for partially satisfactory solutions to conditions adverse to quality. During the nine months that this problem was open, continuous pressure was being applied to obtain a satisfactory solution, and, until final resolution, continuous surveillance was established to assure that no further instances occurred of a similar nature which might adversely affect quality program commitments.

In view of this discussion, FP&L believes this to be an exceptional case, and, therefore, does not violate the intent with respect to being "prompt," as noted in 10CFR50, Appendix B, Criterion XVI.

Final corrective measures involved were as follows: Six (6) Quality Instructions were changed, one (1) Quality Instruction was cancelled, and one (1) Quality Instruction usage was confined to Turkey Point. In addition, any new issues of the Quality Instruction Index will show all outstanding Temporary Changes as applicable to each revision level Quality Instruction. The audit finding of construction Quality Assurance Audit QAC-PSL-82-02 was closed on January 4, 1983.