

USNRC REGION II  
ATLANTA, GEORGIA

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March 17, 1983  
L-83-147

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: WHM  
St. Lucie Unit 2  
Docket No. 50-389/83-05

Florida Power & Light Company has reviewed the subject inspection report which identified the following deviation:

"Failure to flush underground fire protection piping systems prior to connection to the automatic sprinkler systems for the diesel generator building".

Please find attached our response to this deviation.

Very truly yours,

A handwritten signature in cursive script that reads "Robert E. Uhrig". The signature is written in dark ink and is positioned above the printed name and title.

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/cab

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## DEVIATION

Florida Power & Light Company's (FP&L) approved topical Quality Assurance Report, Revision 4, Appendix E identifies FP&L's procedure QP 2.12 as the applicable procedure for implementation of a Quality Assurance program for fire protection systems. This procedure is implemented at the St. Lucie Unit 2 site by procedure SQP-99, Fire Protection Systems. SQP-99 Section 13.12.5.1 requires underground mains and lead-in connections to fire protection system risers to be flushed before connection is made to sprinkler piping in order to remove foreign material which may have entered the underground piping during the course of the installation. The systems are to be flushed at a rate at least equal to the design flow rate of the system. The design of the diesel generator building sprinkler systems require a supply of 800 GPM at 63 PSI.

Contrary to the above, the two underground water mains which supply the sprinkler systems within the Diesel Generator Building were not flushed prior to connecting to the systems.

## RESPONSE

FP&L agrees with the above deviation. The test engineer was not aware of the requirement to flush and record the flow rate through the underground main and "lead-in" connections prior to hook up to the sprinkler system.

Following the inspection, the "lead-in" connections were flushed per procedure 54-CP-110. Per this procedure, the connection from the underground "lead-in" was disconnected from the sprinkler riser and flushed at a flow rate in excess of 1000 GPM. It should be noted that this flush, although completed after initial hook up to the sprinkler riser, was completed prior to the sprinkler system being put into service. The flush was completed on March 5, 1983. Applicable portions of the procedure and data sheets are available at the site.

To prevent the recurrence of similar incidents, any applicable flushes will commence as soon as the "lead-in" connections are construction complete.

Full compliance was achieved March 5, 1983.