

USNRC REC 83-1  
ATLANTA, GEORGIA

83 NOV 25 P 1: 58



November 18, 1983  
L-83-564

Mr. James P. O'Reilly  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 2900  
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 2  
Docket Nos. 50-389  
Inspection Report 83-57

Florida Power & Light Company has reviewed the subject inspection report and a response to Appendix A is attached. A response to Appendix B will be provided within the time period requested in the report.

There is no proprietary information in this report.

Very truly yours,

J. W. Williams, Jr.  
Vice President  
Nuclear Energy Department

JWW/PLP/js

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-83-708

8312200055 831212  
PDR ADOCK 05000389  
Q PDR

Re: St. Lucie Unit 2  
Docket Nos. 50-389  
Inspection Report 83-57

**Finding A**

License Condition paragraph 2.c.13 requires the licensee to implement the fire protection program on a schedule specified in Section 9.5.1.11(a) of Supplement No. 3 to the Safety Evaluation Report (SER). SER Section 9.5.1.11(a) requests the emergency lighting units and fire barriers to be operable by the 5% power milestone. FPL's letter of June 8, 1983, to NRC Region II, stated that all fire barriers would be installed and completed by June 24, 1983, and all emergency lighting units would be permanently installed and supplied by eight-hour batteries by June 30, 1983.

Contrary to the above, the licensee failed to implement the fire protection program within the specified schedule in that:

1. Approximately 50 of the 124 required emergency lighting units were supplied by batteries having a four-hour capacity in lieu of by batteries rated at eight hours.
2. The following fire barriers were not functional:
  - (a) Door openings in the fire barriers around the ECCS pump room were not provided with fire rated doors. The door openings into this area from adjacent fire areas were watertight doors in lieu of fire rated doors.
  - (b) Fire barriers provided with fire doors swinging in pairs at the following location were not operable since these doors were not equipped with astragals which are required to obtain the necessary three-hour fire rating:
    - (1) Doors between fire areas I and H
    - (2) Doors between fire areas H and E
    - (3) Doors between fire areas H and A
    - (4) Doors between fire areas F and G

**Response**

1. Emergency Lighting Units
  - 1) FPL concurs with the finding.
  - 2) After the batteries were purchased, the vendor derated the batteries from eight hours to four hours. FPL committed to have the 8-hour batteries installed by June 30, 1983. FPL tested the batteries to determine which batteries required replacement. The testing and replacement could not be accomplished by the June 30th deadline. An extension should have been requested and was not.

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- 3) All emergency lighting units are now equipped with batteries rated at eight hours.
- 4) Procurement documents have been prepared to indicate the correct battery type. Because this finding represents an isolated occurrence during initial construction no additional corrective steps are required.
- 5) Full compliance has been achieved as of November 18, 1983.

2. Fire Barriers - Part a.

- 1) FPL concurs with the finding.
- 2) FPL failed to submit a deviation request to Appendix R for using water tight doors in areas where fire doors are required.
- 3) FPL will submit a deviation request to Appendix R for using watertight doors in areas where fire doors are required.
- 4) To avoid further problems, a re-review of Appendix R commitments and their implementation is being conducted by FPL.
- 5) A deviation request will be submitted by December 23, 1983.

Fire Barriers - Part B

- 1) FPL concurs with the finding.
- 2) The required astragals were ordered but never installed. The astragals not being installed was an oversight on the part of FPL.
- 3) All Appendix R fire doors swinging in pairs are now operable because the astragals required to obtain a three-hour fire rating have been installed.
- 4) Both engineering and construction have been made aware of the need for astragals to meet fire barrier requirements.
- 5) Full compliance was achieved as of November 18, 1983.

Finding B

Technical Specification 6.8.1.f requires that written procedures be established, implemented and maintained covering the fire protection program implementation.