



December 2, 1983
L-83-576

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

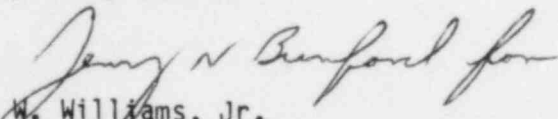
Dear Mr. O'Reilly:

Re: St. Lucie Units 1 & 2
Docket Nos. 50-335, 50-389
Inspection Report 83-29/56

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,


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

JWW/PLP/js

Attachment

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-83-721

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Re: St. Lucie Units 1 and 2
Docket Nos. 50-335, 50-389
Inspection Report 83-29/56

Finding

Technical Specification 6.8.1 of the St. Lucie Unit 2 Technical Specifications requires that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG 0737.

Contrary to the above, three examples of failure to implement procedures were identified:

1. Operating Procedure (OP) - 0010122, In-Plant Equipment Clearance Orders, paragraph 5.6, requires valves under administrative control to be properly denoted on the clearance order. Administrative Procedure (AP) 2-0010123, Administrative Control of Valves, Locks and Switches, specifies that valves V-2145 and V-2155 be "Locked Open" in all modes of operation.

Contrary to the above, clearance order 2-8-88 specified the above valves be placed in the "open" instead of the "locked open" position.

2. OP-0010122 requires that specified tags be appropriately hung. Clearance order 2-5-163 requires valve V-2180 to be tagged "closed".

Contrary to above, on August 26, 1983, the above required tag was missing from the valve.

3. OP-0010122, paragraph 8.2.9, requires that item 8, the Nuclear Safety-Related block, be signed when appropriate.

Contrary to the above, item 8 of clearance order 2-5-121, issued for administrative control of the 2C Auxiliary Feedwater pump warmup valves, was not signed.

Response

1. FPL concurs with the findings.
2. The reason for the findings was administrative operator error.
3. Each of the individual items was corrected at the time they were identified.
4. As corrective action to prevent further problems, the 1983 Requal Program has been revised to include refresher training on AP 0010122, "In-Plant Equipment Clearance Orders" and the recent changes thereto.
5. Full compliance will be achieved by January 15, 1984.