



05 JUN 24 4 0:33  
FLORIDA POWER & LIGHT COMPANY

JUN 21 1985

L-85-241

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
Suite 2900  
101 Marietta Street N.W.  
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Inspection Report 335/85-06 and 389/85-06

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

There is no proprietary information in the report.

Very truly yours,

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

JWW/GRM/cab

cc: Harold F. Reis, Esquire  
File: I-001

8507110701 850621  
PDR ADOCK 05000335  
G PDR

IEOI

PEOPLE...SERVING PEOPLE

## ATTACHMENT

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
IE Inspection Report 335/85-06 and 389/85-06

### FINDING #1

Operating License Condition 2.c.13 requires the licensee to implement the fire protection program on a schedule specified in Section 9.5.1.11(a) and (b) of Supplement No. 3 to the Safety Evaluation Report (SSER). Fire Protection for Safe Shutdown Capability as specified in Section 9.5.1.6.A of this SSER utilizes the guidelines of Appendix R to 10 CFR Part 50. Section III.G.2. of Appendix R requires that redundant trains of systems necessary to achieve and maintain hot shutdown conditions in areas outside of containment be maintained free from fire damage by providing fire protection features in accordance with Section III.G.2.a, III.G.2.b, or III.G.2.c.

Contrary to the above, as of February 19, 1985 and without approved deviation from the required schedule, plant configurations in two areas outside of containment were not provided with adequate fire protection features which satisfy the requirements of Appendix R, Sections III.G.2.a, III.G.2.b, or III.G.2.c to ensure that systems necessary to achieve and maintain hot shutdown conditions be maintained free from fire damage. Equipment and cables for the "A" Train are located in the "B" Train switchgear room, and the "A" Train power cable for 480 volt switchgear 2A5 is routed in the "B" Train cable loft.

### RESPONSE

1. FPL concurs with the finding. This information was previously reported in our letter, L-85-78, dated February 19, 1985.
2. Fire protection was not identified for the above specified cables in the design process.
3. As interim corrective action, continuous fire watches were stationed in the Fire Areas when the discrepancy was discovered on January 30, 1985. In addition, plant operations personnel were advised of the potential effects hypothesized for a severe fire in these Fire Areas. All Fire Areas discussed above are provided with fire detectors, to alert the site fire brigade for a prompt response. Fire extinguishers and hose stations are provided for use in those Fire Areas. Cables and equipment meet Regulatory Guide 1.75 separation criteria and all cables meet IEEE Standard 383.

Long term corrective actions have been initiated to bring these circuits into compliance with 10 CFR 50, Appendix R. Modifications under consideration are:

- a) A breaker will be added to split up the feed for the 2A2 and 2A5 480V load centers. This will eliminate the possibility of a fire in the B switchgear room causing a loss of power in both load centers.
  - b) Fuses will be added in the tie between the A and AB DC Busses. This will eliminate the possibility of a fire in the B switchgear area causing a loss of both DC Busses.
4. FPL conducted a re-review of the fire protection essential equipment cable protection. All other cables and power supplies are protected in accordance with 10 CFR 50 Appendix R.
  5. Corrective actions will be completed prior to startup for St. Lucie Unit 2 Cycle 3 scheduled for April, 1986.

#### **FINDING #2**

Technical Specification 6.8.1.f requires the licensee to implement procedures for the Fire Protection Program.

Contrary to the above, as of this inspection, two procedural errors were identified in Emergency Operating Procedure (EOP) 2-0030144, Revision 3, Alternate Shutdown, which affect implementation of EOP 2-0030144 as follows:

- a. EOP 2-0030144, step 5.8, NOTES, requires utilizing auxiliary spray (chemical and volume control system) if the reactor coolant system is greater than 200°F subcooled, and directs the manual closing of isolation valve V-2485. This action isolates the "A" Train charging path and make-up water to the reactor coolant system. However, this charging path is relied upon for make-up water as delineated in Section 5.0, Caution, which states, "If the fire is in the cable spreading room or control room, control of the reactor and other reactor components must be done utilizing "A" Train components.
- b. For a postulated fire in the control room which requires immediate evacuation with minimal operator action (e.g., reactor trip), the Pressurizer Power Operated Relief Valves (PORVs) cabling is not protected to prevent their spurious operation. EOP 2-0030144 does not contain steps to isolate the PORVs from outside the control room. Failure to isolate the PORVs could result in a significant loss in reactor coolant system inventory and pressure.

#### **RESPONSE**

1. FPL concurs with the finding.
2. During procedure revision to change which trains were to be used, the valve numbers were not changed as required. Isolation of the PORV's was omitted because the cables were not identified as needing the required protection.
3. Procedure changes were made to correct the procedural deficiency.

4. The procedure was corrected and walked down. No further errors could be identified. A second Engineering study was conducted to see if any further items of concern could be identified. These items were incorporated.
5. Full compliance was achieved on March 19, 1985.

### FINDING #3

Operating License Condition 2.c.13 requires the licensee to implement the fire protection program on a schedule specified in Section 9.5.1.11(a) and (b) of Supplement No. 3 to the Safety Evaluation Report (SSER). Fire Protection for Safe Shutdown Capability as specified in Section 9.5.1.6.A of this SSER utilizes the guidelines of Appendix R to 10 CFR Part 50. Appendix R, Sections III.L.2 and 3, describes the performance goal requirements for the alternative shutdown capability and requires that procedures be in effect to implement this capability.

Contrary to the above, without approved deviation from the required schedule, EOP 2-0030144, Alternate Shutdown, was not approved for issue and use by plant personnel until September 26, 1984. The procedure was required to be implemented by April 1983 to satisfy Appendix R, Section III.L. requirements.

### RESPONSE

1. FPL concurs with the violation.
2. Personnel failed to recognize the requirement for a specific procedure to address this concern.
3. Upon review of other utilities practices in this area it was determined a specific procedure was necessary. The specific procedure was issued in September 1984.
4. The action above is considered adequate for the item.
5. Full compliance was achieved on September 26, 1984.