



P.O. Box 14000, Juno Beach, FL 33408-0420

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L-90-271
10 CFR 2.201

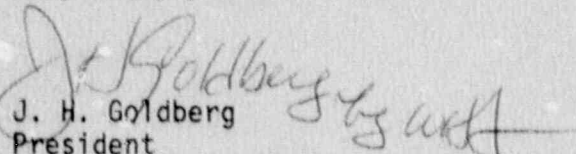
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 90-09
Response to Notice of Violation

Florida Power & Light Company (FPL) has reviewed the subject inspection report, and pursuant to the provisions of 10 CFR 2.201, the response is attached.

Very truly yours,


J. H. Goldberg
President
Nuclear Division

JHG/JWP/lg

Attachment

cc: Stewart D. Ebner, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

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Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inspection Report 90-09
Response to Notice of Violation

VIOLATION:

Unit 1 and Unit 2 Technical Specifications, section 6.8.1, state in part that written procedures shall be established, implemented and maintained. Administrative Procedure (AP) No. 0010432, Revision 41, Nuclear Plant Work Orders (NPWOs) requires the following (including, but not limited to):

1. Section 8.1 requires a deficiency tag to be hung if the NPWO is identifying a deficient plant condition.

Contrary to Section 8.1, on May 10, 1990, there were six Unit-2 control room deficiency tags which were not hanging as required. These tags were associated with the following control room NPWOs: 5588, 7956, 3094, 7662, 7483, 6073. Additionally, on May 8, 1990, there were nine deficiency tags which were not hung on the Unit 2 Emergency Diesel Generators (EDGs) as required. The respective EDG NPWOs were: 3060, 7253, 5058, 7489, 3107, 5065, and three others (NPWO numbers were not available, Work Request numbers XA 891016122630, XA 900321162206, and XA 900502033049, respectively).

2. Section 8.6.9. requires that after work completion, the Journeyman/Technician removes the portion of the deficiency tag used to identify or associate the defect with the NPWO. Additionally, this section requires attaching the deficiency tag to the NPWO after work completion.

Contrary to section 8.6.9., there were four NPWO deficiency tags hung on the EDGs subsequent to work completion and NPWO closure or cancellation. These deficiency tags were 43110 (PWO 7512), 43788 (PWO 7819), and 32711 (PWO 7622) and 32268 (PWO number unavailable). These deficiency tags were not attached to the respective NPWO after completion as required. Additionally, on May 10, 1990, there were nine Unit-2 control room deficiency tags which were not attached to the respective NPWO as required. These deficiency tags were: C43500, C32252, C32295, C40190, C43411, C43456, C43457, C43504, and C43700.

RESPONSE (ITEM 1)

1. Florida Power & Light concurs with the violation.
2. The reason for the violation is procedure non-compliance.
3. The missing deficiency tags on the reference NPWOs have been hung on the applicable components.

RESPONSE (ITEM 1) Continued

4. To prevent recurrence, procedural expectation regarding the hanging and removal of deficiency tags will be re-emphasized to the personnel generating NPWOs. In addition, the deficiency tags assigned to the control room will be checked monthly and discrepancies corrected.
5. Corrective action is expected to be complete by September 1, 1990.

RESPONSE (ITEM 2)

1. Florida Power & Light concurs with the violation.
2. The reason for the violation is procedure non-compliance and inadequate procedural instructions.
3. The deficiency tags left on the equipment after completion or cancellation, have been removed.
4. To prevent recurrence, procedural expectations regarding the removal of deficiency tags following completion or cancellation of NPWOs and the attachment of these tags to the NPWO will be re-emphasized to the personnel closing NPWOs. In addition, AP 0010432, Nuclear Plant Work Orders, will be revised to include instructions regarding the cancellation of a NPWO.
5. Corrective action is expected to be complete by October 1, 1990.

It should be noted that the deficiency tag system does not govern the potential operation of defective equipment as described in Paragraph c.2 on page 10. Our clearance system and equipment out of service log govern the operability of plant equipment. The deficiency tag system was established as an aid to ensure duplicate NPWOs were not written on the same piece of deficient equipment. The deficiency tag system was never intended to function as an equipment status system.