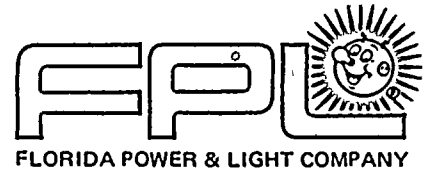


USNRC REGION II
ATLANTA, GEORGIA



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September 15, 1981
L-81-406


Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Docket No. 50-335
Investigation Report 81-06

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

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/RAK/ah

Attachment

cc: Harold F. Reis, Esquire

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PDR ADDCK 05000335
Q PDR



ATTACHMENT

Re: St. Lucie Unit 1
Docket No. 50-335
IE Investigation Report 81-06

FINDING

NUREG-0737, "TMI Action Plan Requirements" was issued to all operating reactor licensees on October 21, 1980 and under the authority of 10 CFR 50.54(f) licensees were requested to furnish confirmation that the implementation dates indicated in Enclosure 1 thereof would be met. Enclosure 1 established an implementation date for Item I.A.1.3 as November 1, 1980.

NUREG-0737, Enclosure 3, Item I.A.1.3, stated that administrative procedures shall set forth a policy such that the use of overtime for employees performing safety related functions is avoided and that in the event overtime must be used, certain overtime restrictions should be followed including a break of at least twelve hours between work periods. Further, while deviations were permitted, Item I.A.1.3 states that such deviations shall be authorized by the plant manager or his deputy in accordance with published procedures and with appropriate documentation of the cause.

The attachment to your letter to the Commission dated December 23, 1980, which was submitted in response to NUREG-0737 stated in part that the overtime restrictions for ROs and SROs clarified by NUREG-0737 (Enclosure 3, Item I.A.1.3) had been implemented.

Contrary to the above, an administrative procedure addressing overtime restrictions was not issued until January 15, 1981 after the lack of such procedure was brought to your attention by the NRC Resident Inspector. Further, the procedure did not specify who could authorize deviations from the restrictions contained therein, until Revision 2 was issued on February 2, 1981 after the discrepancy was identified by the Resident Inspector.

RESPONSE

An administrative procedure that addresses shift overtime restrictions was approved on October 31, 1980 and was later revised by the Facility Review Group on December 23, 1980. As described in the investigation report a single overtime restriction, i.e., twelve hour break between shifts, was inadvertently omitted from the procedure revision on December 23, 1980. Following inclusion of this restriction in the procedure, the NRC Inspector requested a clarification to the procedure stating specifically the individual(s) authorized to approve exceptions to the restriction. The procedure was revised on January 15, 1981 and again on February 4, 1981 to include the changes.

As further corrective action, Quality Procedure 16.1, Corrective Action, has been revised to require verification of actions described in certain FPL responses to the NRC. The procedure is expected to be issued by October 1, 1981. In addition, we are evaluating methods which will further formalize our system of assuring the accuracy of information.