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SUBJECT: Forwards addl info response to util 880922 response to Insp Repts 50-335,389/88-08, per NRC 881202 request.

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APRIL 4 1989

L-89-57

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
Additional Response to
Inspection Report 88-08

By letter dated December 2, 1988, (Malcolm L. Ernst to W. F. Conway), you requested an additional response to Florida Power & Light Company (FPL) letter (L-88-426) dated September 22, 1988 as supplemented by L-88-462 dated October 20, 1988, which provided a response to Inspection Report 88-08.

FPL met with NRC Region II Staff on January 11, 1989 to discuss key Emergency Operating Procedures (EOP). FPL's additional response is attached.

Very truly yours,

W. F. Conway
Senior Vice President - Nuclear

WFC/JRH/gp

Attachment

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

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REQUEST FOR ADDITIONAL RESPONSE
NRC INSPECTION REPORT 88-08

I. EOP ISSUES

The following EOP issues were discussed at the January 11, 1989 meeting between the NRC and FPL.

- A. Operators lack procedural guidance during loss of vital bus work situations. Some loss of bus events caused inappropriate entry into the functional recovery procedure.

FPL actions:

1. An appropriate loss of vital bus procedure has been drafted and is currently being reviewed. Implementation is expected by June, 1989.
2. Emphasis on the available redundancy in instruments and equipment has been stressed by inclusion in the EOP Guidance Document and will be reiterated through training.
3. Implementation of the loss of vital bus procedure using the simulator is expected to commence May, 1989.

- B. The role of the Shift Technical Advisor (STA) was not clearly defined during simulator exams.

FPL actions:

1. The role of the STA has been assessed following the 1988 simulator sessions.
2. To ensure the Emergency Plan (E-Plan) does not interfere with the primary STA role of independent safety assessment:
 - a. The STA's role in the Emergency Plan Notifications will be eliminated until further independent assessment is complete.
 - b. The EOP Guidance Document now directs the STA to assess core safety as his priority. This has been re-emphasized in the administrative procedure, Duties and Responsibilities of the STA.
3. The duties and responsibilities of the STA in the E-Plan Notifications have been revised and the procedure is currently awaiting issue.

C. EOP's have been used to give guidance, not direction.

FPL actions:

1. Plant guidance on EOP usage has been promulgated which specifically emphasizes this issue. This has been accomplished by:
 - a. Night order
 - b. Distribution of individual copies to each licensee
 - c. Reinforcement during training
2. Improvement is being verified by St. Lucie Plant management observation of simulator sessions.

D. Operators hesitate to implement functional recovery procedure (EOP-08). Operators are not familiar with functional recovery procedure (EOP-08).

FPL actions:

1. There will be considerable strengthening of training on Functional Recovery.
2. The Functional Recovery Procedure is being rewritten as part of CEN 152, Rev. 3.
3. More simulator scenarios will require the use of the Functional Recovery Procedure.



II. KEY TRAINING ISSUES

The following training issues were discussed at the January 11, 1989, meeting between the NRC and FPL.

A. Lack of proper emphasis on Functional Recovery.

FPL actions:

1. Emphasis on Functional Recovery will be increased by utilizing a non-traditional training technique whereby the crews can only use the standard Post Trip Procedure and the Functional Recovery to combat events in the simulator. This will be accomplished in the Licensed Operator Requalification (LOR) expected to commence April, 1989.
2. Emphasis on the CEN-152 Bases will be increased, including Functional Recovery, rather than focusing on the event specific procedures.
3. Emphasis on Hot License Simulator Training will be increased to make more use of Functional Recovery. This change will occur prior to the next class, during the 4th quarter, 1989.
4. A requirement is being established that will require all crews to be evaluated in a simulator scenario which specifically requires Functional Recovery during each requalification program.

B. Weakness in procedures and plant systems/control may remain uncorrected if not aggressively identified in simulator training.

FPL actions:

1. Training Management counselled the Simulator Instructors about the importance of aggressiveness in identifying weaknesses in procedures and plant systems/controls when identified in the simulator. This was completed February 14, 1989.
2. Training Management will develop a Program Effectiveness Feedback Survey that addresses potential procedures and plant systems/control deficiencies identified in the simulator.
3. The Simulator Engineering Group will implement a process flow chart for dispositioning Simulator Deficiency Reports. The chart will have a flag for Deficiency Reports that prove to be properly installed so that this information can be addressed in the Plant.

4. The 1989 budget will be modified to change a contractor configuration control technician to a permanent rotational position to be filled by an SRO from Operations. This position is expected to be filled by July, 1989.
- C. Operators and Instructors had not anticipated that the AFAS rupture IO circuit would isolate the operable S/G during cooldown with one S/G isolated.

FPL actions:

1. The existing lesson on Auxiliary Feedwater/AFAS will be revised to incorporate methods of override/manual actuation contingency actions. Implementation to be in the first LOR session.
 2. Existing Simulator Exercise Guides will be annotated to discuss contingency actions and allow practice taking actions. Implementation to be in Simulator LOR Session 3:
- D. Erroneous indications inappropriately lead operators into Functional Recovery.

FPL actions:

1. The existing lesson on Electrical Distribution will be revised to include discussion of bus fault actuation and the restoration sequence with specific reference to the new Off Normal Operating Procedure (ONOP).
2. A Simulator Demonstration Exercise that focuses on instrumentation redundancy to prevent inappropriate entry into the Functional Recovery will be developed.
3. An exercise that utilizes the new ONOP and shows the relationship to the EOP's will be included during training on new degraded electrical EOP's (CEN 152, Rev. 3).



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