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SUBJECT: Forwards response to request for addl info during 910530 enforcement conference re results of interviews conducted in area of operations.Interview topics include,procedural compliance,independent verification & clearances.

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JUN 05 1991

L-91-172
10 CFR 50.4

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

Gentlemen:

Re: St. Lucie Unit 2
Docket No. 50-389
Request for Additional Information during
Enforcement Conference on May 30, 1991

During the Enforcement Conference held in Atlanta, Georgia on May 30, 1991, the Nuclear Regulatory Commission (NRC) requested Florida Power and Light (FPL) to submit additional information concerning the results of interviews conducted in the area of Operations. Attached are the results of the interviews.

Should there be any questions, please contact us.

Very truly yours,

D A Sager

D. A. Sager
Vice President
St. Lucie Plant

DAS/JWH/kw

Attachment

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Attention: G. Jenkins
Senior Resident Inspector, USNRC, St. Lucie Plant

DAS/PSL #452

Inter-Office Correspondence

FPL

NSS-PSL-Ltr-030

To: D.A. Sager

Date: June 4, 1991

From: J.K. Luchka

Department: Nuclear Safety SPEAKOUT

Subject: Results of Operator Interviews

Nuclear Safety SPEAKOUT personnel interviewed 48 Operations Department personnel from Tuesday, May 14 through Friday, May 17, 1991. These interviews were conducted at the request of Operations Department management. Attached is a summary of the interview process, the results, and the conclusions reached by SPEAKOUT.

Please contact me if you have any questions or require further information or assistance.

JKL/arm

Attachment

cc: J.E. Geiger
J.J. Zudans
K.N. Harris
NSS/PSL file

PSL OPERATIONS DEPARTMENT PERSONNEL INTERVIEWS
MAY 14, 1991 TO MAY 17, 1991

I. PURPOSE OF INTERVIEWS

Nuclear Safety SPEAKOUT personnel interviewed St. Lucie Plant Operations Department Licensed Operators (LOs) and Non-Licensed Operators (NLOs) at the request of Operations Department Management. These interviews were conducted by the Human Performance Enhancement System (HPES) Coordinator and NSS Investigator. The purpose of the interviews was to (1) gauge the perceptions and attitudes of operators concerning various issues, including valve verification policy, procedural compliance, configuration control, clearances, and personal safety, and (2) identify any additional situations that Operations Department management should address.

II. PURPOSE OF NUCLEAR SAFETY SPEAKOUT

The objective of Nuclear Safety SPEAKOUT is to improve the quality of operation of the nuclear sites. The program enables employees to express concerns about the safety or quality of any nuclear activity or installation without fear of harassment, intimidation or retaliation. To achieve this objective, anonymity and confidentiality are offered to employees participating in the program. Confidentiality of concernees is stressed in the Florida Power & Light Co. Nuclear Division Policy NP-800 "Nuclear Safety SPEAKOUT" and in the site implementing procedure.

The HPES program is part of NSS at FPL. It serves as a complement and useful adjunct to NSS. These interviews were conducted as part of the HPES element of NSS, and individuals were interviewed in an anonymous and confidential manner.

III. INTERVIEW POPULATION AND METHODOLOGY

The HPES Coordinator and the NSS investigator interviewed Operations Department personnel from Tuesday, May 14, 1991 through Friday, May 17, 1991. A total of 26 NLOs and 22 LOs were interviewed. This represents approximately 38% of the qualified operators in those two classifications.

Non-Licensed Operators and LOs were interviewed using separate questionnaires. Interviewees included operators on shift in the Unit 1 and Unit 2 control rooms and adjacent offices, in the field, and in upgrade or requalification training.

The interview process was concluded when definite trends were identified in operators' responses, and in the interest of providing Operations Department management with timely data.

The HPES Coordinator and the NSS Investigator reviewed the responses to identify issues requiring the attention of Operations Department management.

A summary of interview results was presented Monday, May 20, 1991 to the Operations Department Superintendent and two Nuclear Plant Supervisors. These investigation results were also shared with St. Lucie Plant management.

IV. AREAS ADDRESSED

Interview topics included:

1. Procedural Compliance (temporary changes, verbatim compliance, perception of procedure adequacy).

2. Independent Verification (does it work and method of verifying valve position).

3. Configuration Control (discrepancy between equipment condition and documentation, use of locked valve deviation log).

4. Clearances (use of clearance release steps and/or operating procedure).

5. Personal Safety (adherence to safety rules and time required to comply with them).

Operators also were asked for additional comments or perceptions that they felt should be addressed by Operations Department management.

V. INTERVIEW RESULTS

1. GENERAL RESULTS

The interviews revealed no generic procedural compliance problems. The operators' responses did not reveal any equipment problems of the nature of the Component Cooling Water valve mispositioning. Operators appeared to be genuinely intent upon performing their tasks correctly, and in doing the job to the best of their ability.

The main discrepancy between the expectations of Operations Department Management and the performance of NLOs occurred in the area of valve position verification. Several NLOs revealed that they sometimes relied on methods other than hands-on manipulation to confirm valve position. These methods included reliance on visible valve stem position, valve position indications, and on instrumentation upstream and downstream from the valve.

One area of improvement was identified in the release of clearances, i.e. whether the controlling document is the clearance release order or the operating procedure. Responses indicated the need to clarify which one of these is the controlling document.

Summary perceptions of NLOs include:

* There are methods other than "hands on" that can be used to verify valve position. Some valves are not easily accessible. More time will be required on shift to perform hands-on independent verification of each valve.

* More Senior Nuclear Plant Operators are needed on Day Shift. The amount of work has progressively increased for Day Shift personnel. The workload for Peak Shift and Midnight Shift personnel has remained the same.

* Pressure is being felt to get back on line at the end of an outage. Some NLOs said that "shortcuts" have been taken. These "shortcuts" include climbing to verify a valve position, rather than using a ladder or scaffolding; verifying valve positions by area or room, rather than individually in sequence; and relying on indications to verify valve position, rather than manipulating the valve. At the same time, other NLOs said they take the time to do the job and pass work on to the next shift if it cannot be completed.

* A difference in perception was found between experienced, long-term NLOs and relatively new NLOs. The long-term NLOs had more of a "whatever it takes" attitude than the new NLOs, whose responses indicated a "by the book" attitude.

Summary perceptions of LOs include:

* Day Shift personnel are sometimes overloaded by the volume of work.

* Some operators indicated that some supervisors have asked them to expedite work to get the job done.

* Methods other than "hands-on" manipulation can be used to verify valve positions.

VI. CONCLUSIONS

1. The interviews revealed no generic problem with adherence by Operations Department personnel to requirements in the areas of procedure compliance, configuration control, and personal safety.

2. Interview results revealed a discrepancy between the methodology required and the methodology used in some cases to verify valve positions. The Operations Department Standing Night Order requires "hands on" verification. More than half of the NLOs interviewed indicated that other methods were used to check valve positions, such as valve stem position, valve indicator position, and instrumentation readings. This represents an opportunity for Operations Department management to clarify its expectations concerning compliance with work practice procedures and policies.

3. Interview results revealed an opportunity to improve the clearance release process, specifically to clarify the coordination of the operating procedure with the clearance release order.

4. NSS believes that the responses and perceptions provided by NLOs and LOs were generally candid and honest. Interviewees represented a cross-section of Operations Department licensed and non-licensed personnel.

5. Upon request, NSS is prepared to conduct follow-up interviews using similar questionnaires in approximately six months. The purpose of these interviews would be to gauge modification of perceptions and attitudes among the plant's Operations Department personnel.