



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

Report Nos.: 50-335/92-03 and 50-389/92-03

Licensee: Florida Power and Light Company
 9250 West Flagler Street
 Miami, FL 33102

Docket Nos.: 50-335 and 50-389 License Nos.: DPR-67 and NPF-16

Facility Name: St. Lucie 1 and 2,

Inspection Conducted: January 28-29, 1992

Inspector: *L. King* 3/11/92
 L. King Date Signed

Inspector: *J. Shackelford* 3/11/92
 J. Shackelford Date Signed

Approved by: *J. Crlenjak* 3/12/92
 for J. Crlenjak, Chief Date Signed
 Operational Programs Section
 Division of Reactor Safety

SUMMARY

Scope:

This was a routine unannounced inspection in the area of follow-up of previously identified items. Its purpose was to evaluate the licensee's performance in oversight management.

Results:

The inspectors found that the licensee had adequately addressed the concerns associated with the activities of the Facility Review Group (FRG) and the Independent Safety, Engineering Group (ISEG) which were raised as a result of inspection Report No. 90-09.



REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *G. Boissy, Plant Manager
- *R. Church, ISEG Chairman
- J. Adams, ISEG Engineer
- M. Williford, ISEG Engineer
- M. McFarlane, ISEG Engineer
- J. Holt, Licensing Engineer
- C. Burton, Operations Manager
- G. Pustover, JPN-Site Mechanics
- R. Riha, JPN-Engineering
- C. Ward, JPN Engineering
- W. Dean, E/M
- D. Poteralski, Chairman, CNRB
- J. Geiger, V.P. Nuclear Assurance
- R. Englmeier, Site Quality Manager
- K. Harris, Sr. V.P. Nuclear Operations
- *L. McLaughlin, Licensing Manager
- D. West, Technical Support Manager
- *D. Sager, Site V.P.
- J. Clay, FRG Secretary
- *J. Dyer, Quality Control Manager
- *J. Breen, FPL
- *A. Bailey, FPL Quality Control
- *B. Lechette, Chemistry Supervisor
- *B. Dawson, Maintenance Manager
- *D. Stewart, Technical Staff
- *G. Madden, Licensing Staff

Other licensee employees contacted included engineers, mechanics, technicians, operators, and office personnel.

NRC Representatives

- *S. Elrod, Senior Resident Inspector
- *M. Scott, Resident Inspector
- *L. King, Inspector
- *J. Shackelford, Inspector
- *R. Crljenjak, Chief Operations Programs Section

*Attended Exit Interview

A listing of abbreviations used in this report is contained in Appendix A.

2. Actions on Previously Identified Items

- a. (Closed) IFI 50-335,389/90-09-07: Review the implementation of functional requirement changes after ISEG reorganization.

During the first week of the inspection activities the inspectors reviewed St. Lucie's compliance with TS section 6.2.3.1, which established the ISEG group. Although some progress had been made in the activities associated with the ISEG, the inspectors concluded that this was insufficient to warrant closure of open item 90-09-07. The ISEG group had incorporated a new implementing procedure (QI-1-NA-ISEG-PSL-01) to govern its activities, and in principle, the policies established by this procedure are sufficient to adequately dictate and govern ISEG programs. The inspectors concluded that the policies and guidelines which were established by the procedure were not being adhered to by the ISEG staff.

The licensee's implementing procedure establishes guidelines for the duration of specified ISEG activities. In particular, the assessment activities conducted by the ISEG were intended to take from "several hours to a couple of days" to complete. The inspectors found that six of the 1991 assessments had not been completed and were several months behind. Additionally, six more assessments were also incomplete and were several weeks behind schedule. ISEG surveillances had a target of "two to three weeks" for completion. However, the inspectors found that five surveillances exceeded this goal, and three of the five were over three months behind schedule.

The ISEG group had been assigned over one-hundred total assessments, surveillances and evaluations for completion in 1991. As mentioned previously, many of these items were late and thus the results were still pending. Of the completed activities, a total of twelve recommendations had been made to the facility for review. The licensee's implementing procedure establishes a 45-day target for receiving an acknowledgement from the responsible organization after the issuance of a recommendation. The inspectors found that the ISEG had not been receiving the responses in a timely manner. The licensee had originally identified twelve total overdue responses (some of which were carryovers from the previous year). However, the licensee corrected this total during the exit meeting to reflect a total of nine overdue 45-day response items. The discrepancy between the initial total provided to the inspectors and the revised total which was received at the exit meeting was attributed to deficiencies in the licensee's tracking system for recommendations and responses. Of the overdue responses, several had exceeded the 45-day response window by more than two months.

The inspectors concluded that although the licensee's implementing procedure for the ISEG was adequate to govern the ISEG activities, the licensee had not properly implemented all of the provisions of the instruction. In particular, the previous concerns which were

raised by inspection 90-09 in the areas of productivity and the age of recommendation response items were still evident. Additionally, the deficiencies found in the response tracking system made it difficult to ascertain the correct status of all outstanding items.

As a result of the inspectors' concerns and dissenting comments provided by the licensee at the exit meeting on January 28, 1992, a second week of inspection activity was scheduled. During this period, the inspectors conducted an in-depth review of ISEG activities. The inspectors also reviewed the status of those items which had been examined during the initial phase of the followup inspection. The review included an extensive examination of the ISEG reports and recommendations which had been released in 1991.

The inspectors observed that the quality of the reports released since the last inspection visit were greatly improved relative to those issued earlier in the year. While some of the earlier reports were less substantial with respect to improving plant safety, many of the later reports contained useful insights and recommendations for improving plant safety. The timeliness issue which had been raised in the initial phase of the inspection had also been addressed in that all of the ISEG recommendations had been acknowledged by the appropriate plant organizations and no overdue responses were noted. Additionally, the licensee's system for tracking plant responses and corrective actions had been updated to reflect an accurate status of ISEG recommendations. Thus, based on these observations and the existence of an upward trend in overall ISEG performance, the inspectors concluded that sufficient progress had been observed to warrant closure of IFI 90-09-07.

- b. (Closed) IFI 50-335,389/90-09-08: Review licensee's actions concerning the noted distinct difference in FRG approval process between the meeting conducted by the chairman and meeting held by acting chairman.

The inspectors reviewed the requirements for the conduct of FRG meetings and attended a FRG meeting on January 28, 1992. During the meeting one procedure was returned because of sequence errors and another had an operations signoff added before approval. The inspectors were not present for a meeting conducted by the acting chairman but reviewed minutes of previous meetings and discussed the approval process with the acting chairman. The inspectors also reviewed the concern that the minutes are consistently late and determined by a review of several FRG minutes that the licensee is meeting a deadline of 45 days. This IFI is considered closed.

- c. During the course of the inspection, the inspectors reviewed an ISEG surveillance which had noted that certain vendor-recommended maintenance activities were not being accomplished on the containment cooling system relief dampers. These dampers are safety related and are required to operate during post-LOCA conditions in order to maintain the integrity of the containment cooling system

ductwork and ensure continued operation of the containment cooling system. The licensee had conducted an inspection of the dampers in March of 1990 and had discovered that all of the dampers on the downcomer region of the ductwork in unit one had been painted over. The licensee's immediate actions were to free the stuck dampers. A subsequent inspection of unit two during the next shutdown period did not reveal any painted dampers in that unit. Recent interfaces between the vendor of the dampers and the licensee have resulted in a modified maintenance program which specifies maintenance/inspection at eighteen month intervals. The inspectors were concerned about whether or not the unit one dampers were in an operable condition during the period when required maintenance was not being performed and the dampers were painted over. The licensee had committed to the performance of an engineering analysis of the operational condition and requirements associated with the relief dampers during the periods when the recommended maintenance was not being performed. The results of this analysis are required in the determination of the actual operability status of the dampers. This issue is characterized as an unresolved item until the required engineering analysis has been performed and the information has been provided to the NRC. This item will be identified as URI 50-335,389/92-03-01.

3. Exit Interview

The inspection scope and findings were summarized on January 29, 1992, with those persons indicated in paragraph 1. The NRC described the areas inspected and discussed in detail the inspection findings. No proprietary material is contained in this report. No dissenting comments were received from the licensee.

<u>Item Number</u>	<u>Status</u>	<u>Description, Paragraph</u>
IFI 50-335,389/90-09-07	closed	Review the implementation of functional requirement changes after ISEG reorganization.
IFI 50-335,389/90-09-08	Closed	Review licensee's actions concerning the noted distinct difference in FRG approval process between the meeting conducted by the chairman and meeting held by acting chairman.
URI 50-335,389/92-03-01	Open	Evaluate operability of containment cooling system relief dampers.

APPENDIX A

Abbreviations

FRG	Facility Review Group
FPL	Florida Power & Light
IFI	Inspector Follow-up Item
ISEG	Independent Safety Engineering Group
NRC	Nuclear Regulatory Commission
QI	Quality Instruction
TS	Technical Specifications
URI	Unresolved Item

