



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

Report Nos.: 50-335/94-19 and 50-389/94-19

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 Plant Units 1 and 2

Inspection Conducted: September 26-30, 1994

Inspector: James H. Moorman, III
James H. Moorman, III

10.5.94
Date Signed

Accompanying Personnel: Steve Cahill

Approved by: Lawrence L. Lawyer
Lawrence L. Lawyer, Chief
Operator Licensing Section
Operations Branch
Division of Reactor Safety

10/2/94
Date Signed

SUMMARY

Scope:

This routine, announced inspection was conducted in the area of the licensed operator requalification program during the period September 26-30, 1994. The purpose of the inspection was to (1) verify that the licensee's requalification program for reactor operators (ROs) and senior reactor operators (SROs) ensures safe power plant operation by evaluating how well the individual operators and crews had mastered training objectives; and (2) assess the licensee's effectiveness in ensuring that the individuals who are licensed to operate the facility satisfy the conditions of their licenses as specified in 10 CFR 55.53.

Results:

The examination team concluded that (1) the licensee's requalification program for ROs and SROs was adequate to ensure safe power plant operations; and (2) the facility licensee was effective in ensuring that individuals who are licensed to operate the facility satisfy the conditions of their licenses.

The inspectors identified one weakness concerning an operator's use of emergency operating procedures and operator professionalism. (Paragraph 2.b)

The inspectors identified one non-cited violation for failure to notify the NRC pursuant to 10 CFR 55.25 concerning a change in the medical condition of a licensed operator (Paragraph 2.c).

The inspectors identified one unresolved item concerning the licensees' policy on allowing an NRC licensed SRO that is normally assigned in the control room as an RO be maintained in the operator requalification program as an RO (Paragraph 2.d).

The inspectors identified one inspector follow-up item concerning the licensees' policy stating the Operations Supervisor's SRO license remains in an "active" status by virtue of his position (Paragraph 2.d).



Report Details

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *K. Beatty, FP&L Corporate Nuclear Training Manager
- *W. Bladow, Quality Manager
- *C. Burton, Plant Manager
- *B. Dawson, Licensing Manager
- *D. Denver, Engineering Manager
- *P. Fincher, Training Manager
- *J. Goldberg, President - Nuclear Division, Florida Power and Light
- *J. Holt, Licensing Engineer
- *J. Marchese, Maintenance Manager
- *C. Marple, Assistant Operations Supervisor
- *L. Rich, Training Supervisor
- *J. Scarola, Operations Manager
- *D. West, Technical Manager
- *J. West, Services Manager

Other licensee employees contacted included training department instructors, licensed operators, and office personnel.

NRC Personnel

- *R. Prevatte, Senior Resident Inspector
- *M. Miller, Resident Inspector
- *R. Schin, Project Engineer

*Attended exit interview

2. Licensed Operator Requalification Program Evaluation (71001)

a. Summary

The NRC conducted a routine, announced inspection of the St. Lucie Plant licensed operator requalification program during the period September 26-30, 1994. The purpose of the inspection was to (1) verify that the licensee's requalification program for reactor operators (ROs) and senior reactor operators (SROs) ensures safe power plant operation by evaluating how well the individual operators and crews had mastered training objectives; and (2) assess the licensee's effectiveness in ensuring that the individuals who are licensed to operate the facility satisfy the conditions of their licenses as specified in 10 CFR 55.53. Based on a review of records and observation of examinations, those activities appeared to be satisfactorily conducted. The report identifies one non-cited violation, one unresolved item and one inspector follow-up item.

Enclosure

Additionally, the performance of one Nuclear Plant Supervisor during a simulator examination was not in accordance with generally accepted industry standards for use of emergency operating procedures (EOP), professional conduct, or St. Lucie management expectations. The inspectors concluded that the training department was generally effective evaluating operator performance by administering written and operating requalification examinations.

b. Examination Administration

The inspectors observed the training department evaluators and licensed operators during the administration of operating tests to determine if the tests were administered in accordance with the guidelines in NUREG-1021. The operating test consists of an evaluation on the plant reference simulator and an evaluation using Job Performance Measures (JPMs), which tests an operator's ability to use procedures. The licensee evaluators administered the simulator examinations and JPMs in accordance with training department procedures. During one of the simulator examination scenarios, an operator normally assigned as a Nuclear Plant Supervisor (NPS) performed the duties of Assistant Nuclear Plant Supervisor (ANPS). The NPS is responsible for the control room command and control function and, during an accident, implementing the site emergency plan. The ANPS is responsible for ensuring that the symptom based approach to accident mitigation that is embodied in the EOPs is correctly implemented during an accident scenario. In a scenario involving a loss of feed accident, an ANPS performed the job of accident mitigation using the EOPs in a casual manner with apparent disregard for management guidance on the proper use of EOPs and for the consequences that could result from improper use of the EOPs. This operator failed the examination since he rarely looked at the EOPs during their implementation and did not accomplish all steps that were required by the EOP. However, the casual approach by the operator towards his responsibilities of mitigating an accident was considered unacceptable by both the NRC and St. Lucie management.

No violations or deviations were identified.

c. Medical Records

The inspector reviewed the medical records of 18 operators for compliance with the medical examination and condition reporting requirements of 10 CFR 55.25, "Incapacitation Because of Disability or Illness." The licensee recently completed an internal audit of records documenting licensed operator medical examinations. The audit revealed several discrepancies that the inspector had independently identified. One operator completed a medical examination on January 8, 1993, which indicated that his vision did not meet the minimum requirements. 10 CFR 55.25 required notification of the NRC within 30 days of the date of diagnosis so that the operator's license

could be amended to add a corrective lenses restriction. The licensee did not make the required notification. Another operator was medically examined on May 7, 1992, and was found to need corrective lenses. The licensee did not notify the NRC as required until March 24, 1993. A third individual was medically examined on February 2, 1994, and was found to no longer require a corrective lenses restriction because he had received radial keratotomy. The licensee did not notify the NRC until July 5, 1994. These exceeded the 30 day notification requirement of 10 CFR 55.25. The licensee audit also identified two other individuals who exceeded the two year medical exam requirement of 10 CFR 55.21 by several weeks. Another operator was identified as having exceeded the two year requirement but was actually within the required periodicity. The inspector verified that a date had been inadvertently changed in the licensee's record keeping process. The licensee has taken corrective action for the above discrepancies by processing notifications to the NRC to have each operator's license amended for the appropriate licensing condition.

The inspector also checked for the presence of the NRC-issued license in each operator's file. Section 7.3 of licensee procedure AP 5720, "Licensed Operator Requalification Program," revision 32, required that this be retained in each individual's training file. The inspectors noted that 9 of the 18 files reviewed did not contain a copy of the individual's most recent license.

The inspector also reviewed the licensee's procedures to assess their effectiveness at ensuring the regulatory requirements were met. The inspector concluded that the licensee had very little procedural guidance to ensure license medical conditions were effectively tracked. Administrative Procedure 5720 directed that an operator have a medical exam every two years and that the licensed individual inform the Operations Supervisor of any diagnosis which would cause them not to meet the licensed operator medical requirements. The procedure did not make note of an improving condition, like radial keratotomy, that would result in the removal of a license condition. The inspector found that the licensee's methodology for tracking medical exam completion, placed responsibility on the individual operator to obtain the exam. This did not effectively preclude medical exams from exceeding two year intervals as required by 10 CFR 55.21. The licensee has since adjusted their computer tracking of medical exams to establish a 20 month periodicity. Enhanced tracking would be implemented if the examination was not completed by 22 months. This system was also reconfigured to alert the training department if a medical license condition had changed from a previous status to ensure license amendment requests were processed when required. The licensee has recently promulgated to the operators the importance of notifying the training department of any change in medical status which could require a license amendment to document a medical restriction. The inspectors concluded this was effectively promulgated based on

operator interviews. The training department has been delegated the responsibility of ensuring the NRC was notified. Although the licensee has implemented these changes recently, there is still little procedural guidance to ensure the practices are maintained. The licensee reported that development of a specific section on medical examination and license condition tracking was being developed for inclusion in AP 5720, the licensee requalification program procedure. The contents of this change will be reviewed during future inspections. These violations will not be subject to enforcement action because the licensee's efforts in identifying and correcting the violations meet the criteria of Section VII.B of the Enforcement Policy. These violations are collectively identified as Non-cited Violation, NCV 50-335, 389/94-19-01.

d. Procedure Review

The inspectors reviewed the various procedures that define the accredited and approved licensed operator retraining program. A complete list of procedures reviewed is attached as an appendix.

The inspectors reviewed Administrative Procedure 5720, "Licensed Operator Requalification Program," to determine general compliance with the requirements of 10 CFR 55. The inspectors concluded the licensee's procedure adequately implemented the requirements of the regulation with two exceptions.

The operations department routinely assigns licensed SROs to the position of Senior Reactor Control Operator (SRCO). This position requires performance duties that require only an RO license. Administrative Procedure 5720 allows the SRCO's to be maintained in the requalification program as ROs, with the exception that they must take the SRO biennial written examination. They are tested during their annual operating test in the RO position only. Administrative Procedure 5720 also requires that before an SRCO performs duties that require an active SRO license, the individual is to receive training in SRO duties, successfully pass an operating test and stand the requisite number of proficiency hours on shift. The inspectors identified this as a potential violation but decided to seek NRC Headquarters Operator Licensing Branch interpretation of 10 CFR requirements prior to classifying it as a violation. The determination of acceptable policy on maintaining an SRO licensed individual as an RO in the requalification program is identified as Unresolved Item (URI) 50-335, 389/94-19-02.

The inspectors noted that the licensee procedure allowed the Operations Supervisor's license to be considered active and exempt from the shift watchstanding requirement by virtue of his position. This is contrary to 10 CFR 55.53.e, which requires an operator to actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter to



be considered active. The inspectors reviewed the license tracking list and determined that the licensee considered the Operations Supervisor's license to be active. Although the inspectors could not verify any instances where the individual had actually assumed an on-shift position, interviews with the outgoing Operations Supervisor indicated he considered his license to be active and that he was capable of assuming an SRO position. The current Operations Supervisor assumed the position on September 3, 1994, and was active based on actively performing SRO duties for seven 8-hour shifts as required for his previous position. The licensee planned to suspend his active watchstanding which would legally render his license inactive at the end of 1994. The inspectors identified the licensee's practice of allowing the Operations Supervisor's license to remain active by virtue of his position and exempt from the shift watchstanding requirement as Inspector Follow-up Item (IFI) 50-335, 389/94-19-03.

e. Examination Development

The inspectors reviewed the licensee's requalification written and operating examinations by comparing them to guidelines provided in the licensee's procedures and NUREG-1021, "Operator Licensing Examiner Standards," Revision 7. The inspectors found that the licensee-developed examinations were adequate. A review of selected examinations revealed them to test to adequate knowledge and abilities levels. The examinations generally complied with the guidelines of NUREG 1021, "Operator Licensing Examiner Standards." A review of the examinations also revealed an adequate knowledge level and difficulty separation between RO and SRO questions.

No violations or deviations were identified

f. Performance of On-the-job training

To insure proficiency in infrequently performed tasks with high importance to safety, operators are required to perform selected tasks on the simulator as a part of the requalification program. Prior to a facility licensee having an accredited and approved licensed operator training program based on a systems approach to training, the tasks listed in 10 CFR 55.59(c)(3) were required to be performed to meet the proficiency requirement. The St. Lucie licensed operator requalification program was certified to the NRC as accredited and based on a systems approach to training in a letter dated August 26, 1992. Since the St. Lucie licensed operator requalification program is now approved, they can substitute their approved and accredited program requirements for the requirements of 10 CFR 55.59(c)(3). The inspector reviewed the selection methodology for the list of tasks selected as important for training that were substituted for those in 10 CFR 55.59(c)(3). The inspector concluded the selection methodology was in accordance with the approved systems

approach to training.

No violations or deviations were identified

3. Exit Interview

At the conclusion of the site visit, the inspectors met with representatives of the plant staff listed in paragraph one to discuss the results of the inspection. The inspectors requested that the licensee inform the NRC of the corrective actions taken in regard to the performance of an ANPS during his simulator examination prior to his being returned to licensed duties. The licensee did not identify as proprietary any material provided to, or reviewed by the inspectors. The inspectors further discussed in detail the inspection findings listed below. The licensee did not express any dissenting comments.

<u>Item Number</u>	<u>Status</u>	<u>Description and Reference</u>
NCV 335,389/94-19-01	Open	Failure to notify the NRC concerning changes in status of licensed operator medical conditions (paragraph 2.c).
URI 335,389/94-19-02	Open	Determination of acceptability of maintaining a licensed SRO in requalification training as an RO (paragraph 2.d).
IFI 335,389/94-19-03	Open	Conflicting procedural guidance concerning maintaining the license status of the Operations Supervisor (paragraph 2.d).

APPENDIX

LIST OF PROCEDURES REVIEWED

<u>NUMBER</u>	<u>REVISION</u>	<u>TITLE</u>
AP 5720	32	Licensed Operator Requalification Program
AP 5721	13	Reactor Control Operator Training and Qualification Program
AP 5741	9	Nuclear Training Center File Management
AP 5742	6	Exemption From Training
AP 5754	5	Written Examination Administration and Control
AP 5757	4	Systematic Training Development
AP 5767	3	Performance Evaluation
ADM-17.03	2	Operating Experience Feedback