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50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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PLUNKETT,T.F. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to violations noted in insp rept 96-06 re St Lucie Plant Fire Protection Program discrepancies & observations re Fire Brigade training identified in NRC Insp Rept 95-12. C/A:responsible NWE counseled & disciplined. C
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July 8, 1996

L-96-167
10 CFR 2.201

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Reply to a Notice of Violation
Inspection Report 96-06

Florida Power and Light Company (FPL) has reviewed the subject inspection report and, pursuant to 10 CFR 2.201, the response to the notice of violation is attached.

The St. Lucie Plant Fire Protection Program discrepancies and observations related to Fire Brigade training, which were highlighted in NRC Inspection Report 95-12, were not properly resolved, as evidenced by the subject violation. FPL is confident that the attached corrective actions taken, and scheduled to be taken, will minimize the potential for further violations in this area. Additionally, FPL will review the other Fire Protection Program discrepancies and observations noted in NRC Inspection Report 95-12 to determine the need for additional programmatic corrective actions.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'T. F. Plunkett', is written over the typed name.

T. F. Plunkett
President
Nuclear Division

TFP/JAS/EJW

Attachment

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

9607150043 960708
PDR ADDCK 05000335
Q PDR

IEC 1/1

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VIOLATION:

10 CFR 50 Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979", Criterion III, "Specific Requirements", paragraph H, "Fire Brigade", required, in part, that: "The qualification of the fire brigade members shall include an annual physical examination to determine their ability to perform strenuous fire fighting activities".

Contrary to the above, ten fire brigade members failed to complete an annual physical examination. These fire team members were assigned for a total of 61 shift fire team positions in April, 1996.

This is a Severity Level IV violation (Supplement I)

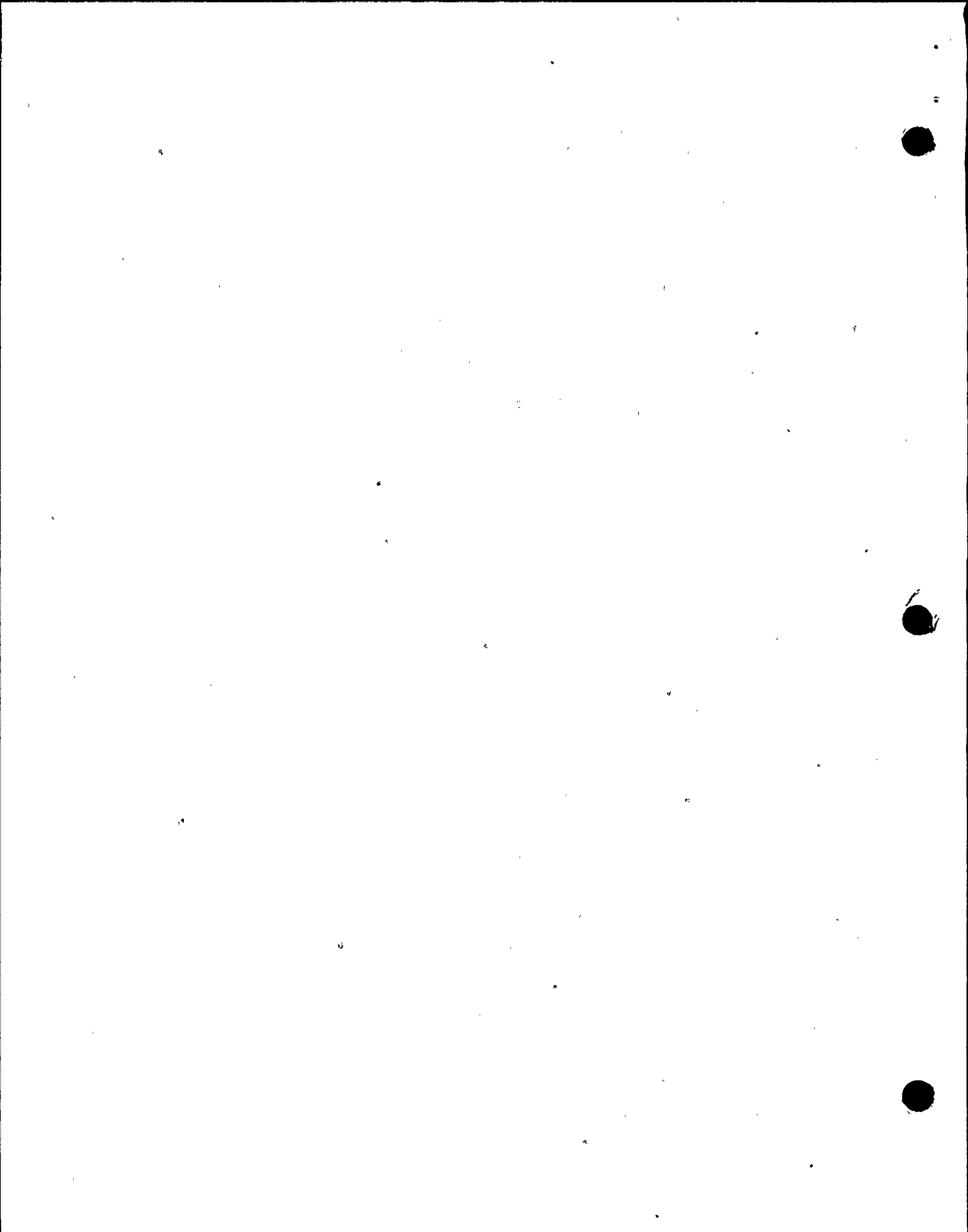
RESPONSE:

1. FPL concurs with the violation.
2. REASON FOR VIOLATION

St. Lucie Plant did not have effective processes for ensuring that special qualification requirements for certain emergency response personnel were current.

General assignment of personnel to the fire team was by means of the monthly Emergency Roster, which is published by the Plant's Training Department. The monthly roster was based on fire protection training and did not account for physical exams, respirator fits, and respirator physicals. A separate system, Radiation Exposure Monitoring and Access Control System (REMACS), existed for notifying Operations supervision of the status of these additional qualifications.

The Nuclear Watch Engineer (NWE), who is responsible for assuring the adequacy of staffing by on-shift personnel for the fire team duties, failed to perform this function. Contributing to this failure of individual performance was the fact that there was no checklist to prompt a crosscheck of the REMACS printout against the Emergency Roster prior to personnel being assigned to the fire team. Consequently, he did not properly confirm all applicable qualifications were current prior to assigning on-shift personnel to the fire team.



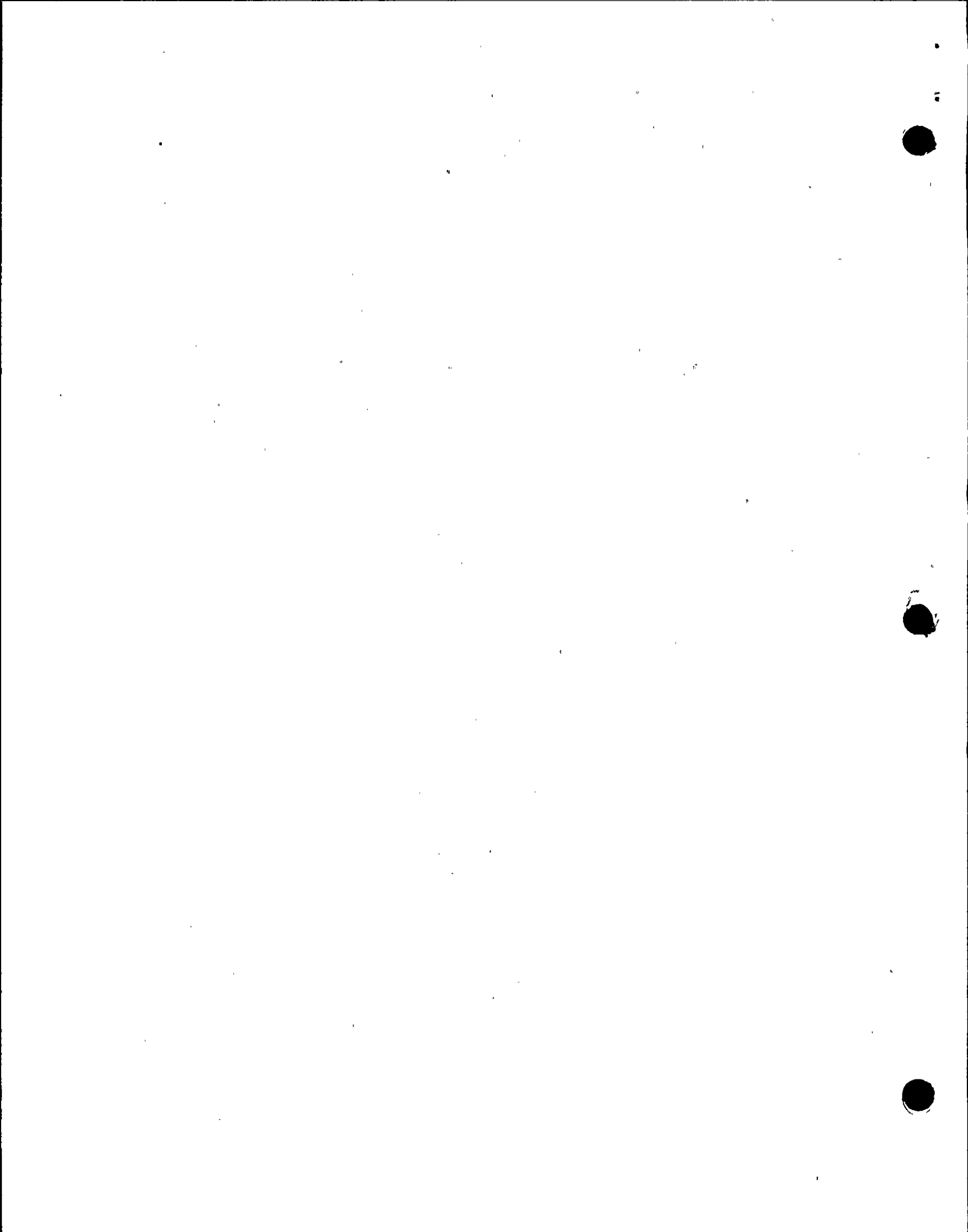
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3. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- A. The responsible NWE was counseled and disciplined.
- B. At the time the violation was identified, the shift complement of licensed and non-licensed operators (including fire team) was reviewed to assure that assigned individuals met all qualification requirements.
- C. Physical examinations and supporting documentation for operator respirator qualifications were reviewed and verified to be accurate and current.
- D. The documentation for Self Contained Breathing Apparatus (SCBA) training was reviewed. The training records for seven individuals in the operations department were not retrievable. These individuals were subsequently retrained.
- E. The Operations Scheduler has been assigned the responsibility and accountability of tracking and ensuring maintenance of general qualifications (such as RCAT, GET, respirator fit, respirator physicals).

4. CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS

- A. The Emergency Roster format will be revised, by August 1, 1996, to include Operations Department qualifications. The Emergency Roster will be published by the St. Lucie Plant Training Department each month and will list the required qualifications for the positions, as well as the individuals who are qualified to fill those positions.
- B. Plant administrative procedure AP 0005729, *Fire Protection Training, Qualification and Requalification*, was revised to require notification of on-shift Operations management of the failure of a physical examination, or failure of Fire Brigade training/requalification by Operations Department personnel.
- C. Health Physics procedures HP-73, *Portacount Plus Fit Test System*, and HPP-60, *Respiratory Protection Manual*, were revised to require notification of on-shift Operations management of the failure of a respirator qualification by Operations Department personnel.
- D. The Operations Supervisor issued a Night Order reemphasizing the personal responsibility of each individual in the Operations Department, as stated in



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Operations Policy OPS-202, *Maintaining Qualification*, to maintain active qualifications and to be currently qualified for the positions which they are filling within the plant organization.

5. Full compliance was achieved on May 7, 1996, when the existing and on-coming shift complements of operators (including fire team) were reviewed and assigned to shift responsibilities with confirmed current physical examination qualifications.

