

CATEGORY 1

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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.
 AUTH.NAME PLUNKETT, T.F. AUTHOR AFFILIATION Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

DOCKET #
 05000335
 05000389

SUBJECT: Responds to violations noted in insp repts 50-335/97-11 & 50-389/97-11. Corrective actions: implemented new set of Maint/Training policies, issued interim controls lte stating mgt expectations & revised procedure ADM 08.02.

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December 19, 1997

L-97-319
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
NRC Integrated Inspection Report 97-11

By Florida Power & Light Company (FPL) letter L-97-291, dated December 10, 1997, FPL responded to violations A, B, and C of the subject inspection report. In a telephone conversation with Kerry Landis, Region II Branch Chief, on December 10, 1997, FPL was granted an extension for the response to violation D. FPL committed to respond to violation D on or before December 23, 1997.

FPL agrees that administrative procedure ADM 08.02, Conduct of Maintenance, Revision 15, was weak in that it could have permitted de facto job task qualification, in lieu of full qualification, under the established systematic approach to training for Maintenance job task qualification. Nonetheless, FPL has not identified any occurrences of violating or circumventing the systematic approach to training by Maintenance personnel in the field based upon a review of work control and corrective action documents, and interviews with Maintenance supervisors. Plant procedure ADM 08.02 has been revised to address the weakness. However, FPL believes that sufficient training and qualification records are, and have been, maintained for all personnel participating in the plant's training programs since plant procedure ADM 08.02 was not intended to be used to conduct training and establish personnel qualifications.

Please contact us with questions on the enclosed violation response.

Very truly yours,

Thomas F. Plunkett
President
Nuclear Division

TFP/JAS/EJW

Attachment

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

IED 1/1

9712240082 971219
PDR ADOCK 05000335
Q PDR



Violation D

10 CFR 50.120(b)(1) requires, in part, that training programs for instrument and control technicians, mechanical maintenance personnel, and electrical maintenance personnel be established, implemented and maintained using a systems approach to training as defined in 10 CFR 55.4, including, in part, an evaluation of trainee mastery based on learning objectives describing desired task performance.

10 CFR 50.120(b)(2) requires, in part, sufficient records of trainee evaluation, including trainee mastery of desired task performance, be maintained by the licensee to maintain program integrity and that sufficient records be available for NRC inspection to verify the adequacy of the program.

Contrary to the above, as of October 3, 1997, ADM-08.02. Revision 15, "Conduct of Maintenance," was inadequate in that it failed to implement a systems approach to training for electrical, mechanical and instrument and control personnel by allowing the evaluation of trainee mastery without established specifications and objective-based evaluation criteria as required by the systems approach to training. In addition, ADM-08.02, Revision 15, "Conduct of Maintenance," did not contain the provision for documenting task qualification evaluations as required by a systems approach to training.

This is a Severity Level IV violation (Supplement I).

Response

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

The cause of the violation was a weakness in administrative procedure ADM 08.02, Conduct of Maintenance, which could have permitted de facto job task qualification, in lieu of full qualification, under the established systematic approach to training for Maintenance job task qualification. It should be noted that administrative procedure ADM 08.02 was not used to govern training and evaluation functions of the systematic approach to training. Those functions have been, and remain, the responsibility of the St. Lucie Plant accredited training programs.

To assign work in the plant, supervisors, foremen, chiefs, and leads use a qualification list, provided by the Maintenance Training organization, that identifies the qualification level of site journeymen. The list is provided so that persons responsible for assigning work are not required to review mastery of training objectives for each job. Additionally, plant procedure ADM 08.02 provided for the application of supervisory oversight, procedural direction, or work order detail,

as appropriate, to allow persons who were not job task qualified to perform work within their journeyman qualifications. Plant procedure ADM 08.02 was never intended to provide direction for evaluating trainee mastery of objectives or to contain requirements for documenting task qualification evaluations, as required in a systematic approach to training.

A records review of maintenance tasks performed and other documentation (e.g., Condition Reports and Licensee Event Reports), in addition to interviews with Maintenance supervisors, revealed no evidence of circumvention of the systematic approach to training-based training and qualification requirements. FPL acknowledges that procedure ADM 08.02 was weak in its definition of "supervisory oversight."

The requirement to document task qualification evaluations is implemented by plant Quality Instructions and by lower tier plant procedures. Plant procedure ADM 08.02 was not intended to satisfy the evaluation and qualification requirements of 10 CFR 50.120 or for documenting task qualification evaluations. Training records, including records of written examinations and task performance evaluations, are properly maintained for each training program participant at St. Lucie Plant. These records provide the basis for the journeyman qualification lists which are provided to Maintenance supervisors, foremen, chiefs, and leads.

3. CORRECTIVE STEPS TAKEN AND THE RESULTS ACHIEVED

- A. In response to a self-identified need for additional clarification on assignment of work and use of the qualification lists prior to work assignment, the Maintenance Department implemented a new set of Maintenance/Training Policies. These policies, among other things, reinforced: 1) the requirement that personnel must be qualified for assigned tasks, and; 2) the review and use of qualification lists by field supervisors prior to assignment of work. Maintenance Department heads, supervisors, foremen, chiefs, and leads were provided training on these policies. As a result, Maintenance personnel are not being assigned to perform work for which they do not have specific task qualifications unless they are working under the direction of a qualified person.
- B. In response to an FPL Quality Assurance Department audit finding, on September 30, 1997, the St. Lucie Plant General Manager issued an interim controls letter that clearly stated management expectations that personnel are to be job task qualified prior to performing work independently. The September 30, 1997, letter focused on work assignment for both plant and non-plant personnel and identified that a procedure addressing this subject would be implemented (subsequently implemented as a revision to plant procedure ADM 08.02).

4. **CORRECTIVE STEPS TO AVOID FURTHER VIOLATIONS**

- A. Administrative procedure ADM 08.02 will be revised to remove the language that could have allowed personnel to be assigned work based on supervisory oversight. The revised procedure specifically will require that personnel who have not been job task qualified shall work under the direction of qualified personnel when performing plant maintenance. The procedure will be issued for use by January 23, 1998, following completion of pre-implementation training.
 - B. A new administrative procedure, ADM 22.01, Verification of Training/ Certification for Temporarily Employed Personnel, has been developed to provide guidance on the review of training and qualifications for temporarily assigned personnel, such as contractors, employees loaned from other departments during outages, and for up relieving personnel during periods such as vacations or illness, as required. This procedure is the result of extensive benchmarking throughout the industry and represents best industry practice for screening and certifying that temporarily employed personnel meet plant standards for qualification on specific tasks prior to work assignment. Administrative procedure ADM 22.01 was recommended for approval by the Facility Review Group and will be implemented in January 1998 after appropriate pre-implementation training.
 - C. The Maintenance Supervisor Training Program will be revised to reinforce the changes identified in ADM 08.02 and the newly issued ADM 22.01, as well as to ensure that management policy on use of the qualification lists in assigning work is fully understood by the participants. That training will be revised by February 28, 1998 (prior to the next class for new supervisors). In the interim, this information will be provided to incumbent supervisors as continuing training.
5. Full compliance will be achieved by January 23, 1998, with the completion of item 4.A., above.