



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report Nos.: 50-250/80-31, 50-251/80-29, 50-335/80-33 and 50-389/80-14

Licensee: Florida Power and Light Company
P. O. Box 529100
Miami, FL 33152

Facility Name: Turkey Point 3 and 4, St. Lucie 1 and 2

Docket Nos. 50-250, 50-251, 50-335, 50-389

License Nos. DPR-31, DPR-41, DPR-67, CPPR-144

Meeting at FP&L Corporate Office, Miami, Florida

Attending Personnel: See Details

Approved by: R. C. Lewis
R. C. Lewis, Acting Chief, RONS Branch

2/2/81
Date Signed

SUMMARY

Meeting conducted October 29, 1980

This special, announced management meeting was conducted to discuss the results of NRC's evaluation of FP&L's regulatory performance as concluded in the Systematic Assessment of Licensee Performance (SALP) program.

Results

A summary of the licensee performance evaluation was presented. Areas of concern were discussed with corporate management. FP&L's performance is considered to be acceptable although three areas were identified for increased inspection emphasis.

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DETAILS

1. Personnel Attending Meeting

E. A. Adomat, Executive Vice President
W. R. Barr, Manager of Purchasing
J. H. Barron, Operation Superintendent of Nuclear Section
S. G. Brain, Senior Project Manager
J. A. DeMastry, Manager Nuclear Licensing
R. F. Englmeier, Assistant Manager of Quality Assurance
T. Essinger, Assistant Manager of Quality Assurance
R. D. Hankel, Assistant Manager of Nuclear Analysis
C. S. Kent, Senior Project Manager
J. R. Killingsworth, Director of Purchasing Inventory Resources
J. M. McCabe, Senior Security Coordinator
E. H. O'Neal, Assistant Chief Engineering
H. N. Paduano, Manager Power Resources Nuclear Services
A. D. Schmidt, Vice President
A. E. Siebe, Manager of Quality Assurance
H. F. Story, Power Resources Section Supervisor
R. E. Uhrig, Vice President Advanced System and Technology
J. E. Vessely, Direct Nuclear Affairs
N. T. Weems, Assistant QA Construction Manager
C. O. Woody, Manager Power Resources Nuclear

Nuclear Regulatory Commission

J. P. O'Reilly, Director, Region II
R. C. Lewis, Acting Chief, RONS Branch, Region II
R. Martin, Section Chief, RONS Branch, Region II
M. Grotenhuis, Licensing Project Manager, Turkey Point 3 and 4
J. McKinley, Chief Project Review Branch, #1 ACRS

NRC Resident Inspector

S. Elrod, Senior Resident Inspector at St. Lucie
A. Ignatons, Senior Resident Inspector at Turkey Point
H. Bibb, Resident Inspector at St. Lucie
B. Marsh, Resident Inspector at Turkey Point

2. Areas Discussed.

- a. A brief summary of the Systematic Assessment of Licensee Performance (SALP) was presented to include the basis for the evaluation and its purpose.
- b. The results of the SALP evaluation of the licensee's performance were discussed. FP&L's performance to date is considered acceptable although three areas were identified for increased inspection emphasis by the NRC. The SALP evaluations are contained in Enclosures 1 through 4 to this report.



- c. Items of concern were discussed with corporate management to include those areas where the NRC considers additional licensee management attention may be warranted.



Enclosure 1

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

FOR

FLORIDA POWER AND LIGHT COMPANY

UTILITY PERFORMANCE EVALUATION

Utility: Florida Power and Light Company

Units: Turkey Point 3, 4
St. Lucie 1, 2

Appraisal Period: Turkey Point 3, 4, St. Lucie 1 - May 1, 1979 through April 30, 1980

St. Lucie 2 - September 1, 1979 through August 31, 1980

Review Board Members:

R. C. Lewis, Acting Chief, RONS Branch
C. E. Murphy, Chief, RC&ES Branch
R. Martin, Chief, Reactor Projects Section 2
J. C. Bryant, Chief, Projects Section 1
T. E. Conlon, Chief, Engineering Support Section 1
M. Grotenhuis, LPM, NRR
C. Nelson, LPM, NRR

Background

SALP evaluations for each site were generated as prerequisites to the NRC identifying the general performance level of each utility with an NRC license. These evaluations are forwarded to an interoffice review board formed of senior members from all Offices of the NRC involved in licensed activities. The board will, by virtue of receiving all SALP evaluations, form a national perspective of licensee performance. Additionally, the evaluations will provide a means for highlighting areas of NRC programs that may require changes or redirection.

In developing the site evaluations it was determined that an overall evaluation of the utility's performance in its nuclear activities was desirable. Additional enclosures document the individual site evaluations.

The utility and site evaluations were presented in a meeting with senior corporate management in order to provide the decision makers of each utility with the NRC's evaluation of its overall performance in nuclear activities.



A. Areas of Good Performance

Florida Power and Light (FP&L) is generally responsive to NRC regulations and findings of noncompliance. Reassignment of personnel at the site level has improved management effectiveness. Licensed operator performance is above average. Non-licensed operator performance warrants continued attention by the licensee.

B. Areas Where Improved Performance is Warranted

Substantive differences have been observed in performance between the two sites. This suggests there is minimal corporate involvement in day-to-day operations. FP&L exhibits a rigid view of their regulatory obligations and strives to meet the letter rather than the spirit of their commitments. This is counterproductive in dealing with the NRC. A poor attitude toward regulatory efforts exists on the part of certain individuals at the St. Lucie site. This has been brought to the attention of the corporate office.

C. Overall Evaluation

As a result of this evaluation, FP&L is considered an average performer in the Region. It should be noted that this appraisal contains the results of two team inspections. The results of the noncompliance items cannot be directly compared to other facilities which have not received these inspections. Future inspection results in these areas, compared with these results will be more indicative of both relative and absolute performance.

Enclosure 2

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

FOR

TURKEY POINT UNITS 3 AND 4



Licensee Performance Evaluation (Operations)

Facility: Turkey Point

Licensee: Florida Power and Light Company

Unit Identification:

<u>Docket No.</u>	<u>License No./Date of Issuance</u>	<u>Unit No.</u>
50-250	DPR-31/7-19-72	3
50-251	DPR-41/4-10-73	4

Reactor Information	Unit 3	Unit 4
NSSS	Westinghouse	Westinghouse
MWT	2220	2220

Appraisal Period: May 1, 1979 through April 30, 1980

These dates were used to provide a comparable basis for all operating reactors in Region II. Significant events or enforcement items occurring after these dates were considered in arriving at the indicated conclusions.

Appraisal Completion Date: October 9, 1980

Review Board Members:

R. C. Lewis, Acting Chief, RONS Branch

R. Martin, Chief, Reactor Projects Section 2

F. Jape, Acting Project Coordinator

M. Grotenhuis, LPM, NRR (contacted by telephone on 10/8/80)

A. Ignatonis, Senior Resident Inspector (contacted by telephone on 10/8/80)

W. Marsh, Resident Inspector (contacted by telephone on 10/8/80)

A. Number and Nature of Noncompliance Items

Noncompliance Category:	<u>Unit 3</u>	<u>Unit 4</u>
Violations	0	0
Infractions	13	9
Deficiencies	2	2



Areas of Noncompliance (List Areas As Required)	Unit 3 (Points)	Unit 4 (Points)
Security	0	0
Radiation Protection	40	30
Environmental	2	2
Quality Assurance	20	20
Admin/OPS/Maintenance	72	42
TOTAL POINTS	<u>134</u>	<u>94</u>

- (1) The Quality Assurance and Radiation Protection areas were addressed during enforcement conferences held June 6, 1979 and October 5, 1979, respectively. Subsequent re-inspection in the QA area has closed the large majority of the noncompliances in that area.
- (2) Noncompliances in the administrative area were primarily failure to provide adequate procedures and failure to follow procedures in the operation and maintenance areas. The licensee has committed to a program of procedure compliance and to upgrade the quality of procedures. This is viewed as a major step by management in improving management control of plant activities.
- (3) Recent inspections have indicated signs of weakness in the area of identification, tracking; and completion of commitments to the NRC, such as corrective action to items of noncompliance or programmatic commitments. This area also remains open from the QA team visit of March 1979.
- (4) Evaluation of the Health Physics program was conducted May 5-16, 1980, by a team of radiation specialists including Health Physics Inspectors from Region II. Several items remain open.

B. Number and Nature of Licensee Event Reports

Type of Events: (By Cause Codes)	<u>Unit 3</u>	<u>Unit 4</u>
Personnel Error	7	2
Design	4	2
Installation	2	2
Component Failure	12	8
Other	9	2
Not Reviewed	6	2
TOTAL	<u>40</u>	<u>18</u>

Licensee Event Reports reviewed included 250-79-01 through 250-79-40, 251-79-1 through 251-79-18, with exceptions noted.



Licensee Event Reports (LERs) showed no clear trends. Several LERs mentioned long-term corrective actions as being "scheduled". The Resident Inspector will review these actions to determine whether or not commitments are being properly tracked and managed.

C. Escalated Enforcement Actions

Civil Penalties:

None

Orders:

TMI Lessons Learned License Order issued and resolved.

Immediate Action Letters:

August 31, 1979 - Issued to confirm the operational, procedural and instrumentation actions to be taken by the licensee to avoid a future spent fuel pool overflow.

September 5, 1979 - Issued to confirm the additional steps to be taken by the licensee to account for unmonitored radioactive liquid discharges, remove or evaluate the contaminated dry well, and identify the source of activity in the storm drain system.

D. Management Conferences Held During the Twelve Months

- (1) A meeting was held with FP&L management and corporate personnel in the Region II office on June 6, 1979. The meeting was to express our concerns about the effectiveness of the FP&L's Operational Quality Assurance Program and Management Control System related to Turkey Point Units 3 and 4. The meeting was held as a result of our identifying 15 items and 13 items of noncompliance on Units 3 and 4, respectively, during a QA Inspection in March 1979. A followup inspection conducted in December 1979 to determine the licensee responsiveness to our concerns closed the majority of noncompliances.
- (2) A meeting was held with FP&L management and corporate personnel in the Region II office on October 5, 1979. The meeting resulted from two Immediate Action Letters (Paragraph C.) concerning unplanned release of radioactive water. The licensee committed to improve procedures, train personnel and to follow procedures. The Senior Resident Inspector reports a major improvement in the licensee's adherence to procedures. The HP program was inspected during the Health Physics team visit, May 5-16.

E. Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Emphasis

- (1) A large number of design changes are underway as a result of TMI Lessons Learned Task Force activities and Fire Protection Safety Evaluation Report.



- (2) Noncompliances in the areas of management control and review of design and maintenance activities indicate that weakness may exist in these areas.
- (3) The QA program for fire protection activities has not been fully implemented.
- (4) In 1980, the normal Health Physics Inspection program was modified to include only one visit by a team of radiation specialists responsible for inspection of all phases of the licensee's HP program. The team concluded that the licensee's HP program was above average.

Increased emphasis in the above four areas is planned, but no change in inspection frequency is warranted.

F. Comparison of Unit 3 With Unit 4

A comparison of Unit 3 with Unit 4 did not indicate that appreciable differences exist between the units.

G. Overall Evaluation

Licensee performance is acceptable and is judged to be average for the Region. The routine inspection program will place increased emphasis in the areas of design changes, plant modifications, fire protection and health physics. No increase in inspection scope or frequency is needed.

Appendix A -- Functional Areas

Appendix B -- Action Plan (Internal Use Only)

APPENDIX A

2-A-1

FUNCTIONAL AREAS (Operations)

Inspection
Frequency and/or Scope

FUNCTIONAL AREA	Inspection Frequency and/or Scope		
	Increase	No Change	Decrease
1. Management Control		X	
2. Plant Operations		X	
3. Refueling Operations and Activities		X	
4. Maintenance		X	
5. Surveillance and Preoperational Testing		X	
6. Training		X	
7. Radiation Protection		X	
8. Environmental Protection		X	
9. Emergency Planning		X	
10.. Fire Protection		X	
11. Security and Safeguards		X	
12. Design Changes and Modifications		X	
13. Reporting		X	
14.. QA Audits		X	
15. Committee Activities		X	
16. Quality Control		X	
17. Procurement		X	

R. C. Lewis
(BRANCH CHIEF)

1/12/81
(DATE)

Enclosure 3

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

FOR

ST. LUCIE UNIT 1



Region IILicensee Performance Evaluation (Operations)

Facility: St. Lucie 1

Licensee: Florida Power and Light Company

Unit Identification:

<u>Docket No.</u>	<u>License No./Date of Issuance</u>	<u>Unit No.</u>
50-335	DPR-67/3-1-76	1

Reactor Information

Unit 1

NSSS

Combustion Engineering

MWT

2660

Appraisal Period: May 1, 1979 through April 30, 1980

These dates were used to provide a comparable basis for all operating reactors in Region II. Significant events or enforcement items occurring after these dates were considered in arriving at the indicated conclusions.

Appraisal Completion Date: October 9, 1980

Review Board Members:

R. C. Lewis, Acting Chief, RONS Branch

R. Martin, Chief, Reactor Projects Section 2.

F. Jape, Acting Project Coordinator

C. Nelson, LPM, (contacted by telephone on 10/8/80)

S. Elrod, Senior Resident Inspector (contacted by telephone on 10/7/80)

A. Number and Nature of Noncompliance Items

Noncompliance Category:

Unit 1

Violations

0

Infractions

13 (3 repeats)

Deficiencies

4

Areas of Noncompliance

Unit 1

List Areas As Required

(Points)

Security

72

Radiation Protection

40

Operations/Maintenance

24

Quality Assurance

20

Training

12

TOTAL POINTS

168



The radiation protection items were concentrated in the area of shipping requirements. Subsequent inspections failed to identify further problems in this area. The QA items were the result of a team QA inspection. The security items centered around failure to control accesses, especially to vital area, and searches. The other areas contain relatively low point values, indicating satisfactory performance.

B. Number and Nature of Licensee Event Reports

Type of Events:	<u>Quantity</u>
Personnel Error	5
Design Error	3
Installation	2
Defective Procedures	1
Component Failure	21
Other	4
TOTAL	<u>36</u>

Licensee Event Reports reviewed included 79-001/03L-0 through 79-036/03L.

Evaluation of the Above Tabulation:

Nine of the 36 event reports concerned the rod control system. It appears that reliability of operation is low but failure prevents rod withdrawal or results in rod insertion (dropped rod). This compilation suggests a design problem rather than equipment failure.

The personnel errors, design errors and installation errors are all personnel errors in reality. They were spread over a spectrum of responsible parties. No clear pattern emerges.

C.. Escalated Enforcement Actions:

Civil Penalties

None

Orders

TMI Lessons Learned Orders issued and resolved:

D. Management Conferences Held During Twelve Months

A meeting was held with FP&L facility management and corporate personnel in Region II Office on March 26, 1980, to discuss NRC's concerns about the licensee's security program at St. Lucie Unit 1. Areas of major concern were vital area accesses and searches, compounded by repeat noncompliances. Followup inspections are planned.

E. Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Frequency

The evaluation and management conference indicate a need for increased emphasis in the physical security area. Followup inspections in the physical security area will be conducted to resolve current issues. No change in routine inspection program is warranted.

F. Comparison of Unit 1 With Unit 2

A comparison of Unit 1 (in operation) with Unit 2 (in construction) is not useful for the period of this evaluation. As Unit 2 progresses through construction (estimated completion early 1982) an appropriate comparison will be available.

G. Overall Evaluation

Licensee performance is acceptable. The licensee's performance is considered average as compared with other Region II reactors. No increase in the inspection program scope or frequency is needed. The routine inspection program will place increased emphasis on plant physical security.

Appendix A - Functional Areas

Appendix B - Action Plan (Internal Use Only)



APPENDIX A

3-A-1

FUNCTIONAL AREAS (Operations)

Inspection
Frequency and/or Scope

FUNCTIONAL AREA	Inspection Frequency and/or Scope		
	Increase	No Change	Decrease
1. Management Control		X	
2. Plant Operations		X	
3. Refueling Operations and Activities		X	
4. Maintenance		X	
5. Surveillance and Preoperational Testing		X	
6. Training		X	
7. Radiation Protection		X	
8. Environmental Protection		X	
9. Emergency Planning		X	
10. Fire Protection		X	
11. Security and Safeguards		X	
12. Design Changes and Modifications		X	
13. Reporting		X	
14. QA Audits		X	
15. Committee Activities		X	
16. Quality Control		X	
17. Procurement		X	

R. C. Lewis
(BRANCH CHIEF)

11/2/81
(DATE)

Enclosure 4.

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

FOR

ST. LUCIE UNIT 2



REGION II

LICENSEE PERFORMANCE EVALUATION (CONSTRUCTION)

Facility: St. Lucie, Unit 2

Licensee: Florida Power and Light Company

Unit Identification:

<u>Docket No.</u>	<u>CP No./Date of Issuance</u>	<u>Unit No.</u>
50-389	CPPR-144/5/2/1977	2

Reactor Information:

Unit 2NSSF.
MwtCombustion Engineering
2440

Appraisal Period: September 1, 1979 through August 31, 1980

Appraisal Completion Date: October 9, 1980

Review Board Members:

C. E. Murphy, Chief, RC&ES Branch
 J. C. Bryant, Chief, Projects Section #1
 T. E. Conlon, Chief, Engineering Support Section #1
 C. R. McFarland, Project Inspector
 R. A. Birkel, Licensing Project Manager, NRR (By Telephone)

A. Number and Nature of Noncompliance Items

Noncompliance category:	<u>Unit 2</u>
Violations	0
Infractions	6
Deficiencies	2

Areas of Noncompliance: (List Areas as Required)	<u>Unit 2 (Points)</u>
Instructions, Procedures, and Drawings	52
Part 2 Procedural Requirements	10
Environmental Concerns	<u>2</u>
Total Points	64



The board in its deliberation of Noncompliance Items considered that the timing of the noncompliance did not indicate a trend that would indicate any major breakdown in the licensee's QA program. The licensee's responses to the noncompliances has been found to be adequate and timely.

B. Number and Nature of Construction Deficiency Reports (CDRs)

Electrical	6
Mechanical	4
Welding	1

Only one CDR (hurricane damage) related to site work. The other CDRs related to design and component manufacturing problems.

The licensee has exercised care in evaluating CDRs and the reports have been acceptable.

C. Escalated Enforcement Actions

None during this audit period.

D. Management Conferences Held During Past Twelve Months

None.

E. Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Frequency/Scope (See evaluation sheet)

The construction activities have increased to the point that within the next twelve months windows of opportunities will be open for all modules. Cold hydro is scheduled for March 1982, and fuel loading is scheduled for October 1982. The routine NRC inspection of areas has been needed, but the routine program has been severely impacted by the reactive inspection requirements. During the appraisal period no inspections were performed by a mechanical inspector, and only one was performed by an electrical inspector. The licensee's construction and inspection programs have been maintained on schedule.

F. Comparison of Unit 2 With Unit 1

A comparison of Unit 2 (in construction) with Unit 1 (in operation) is not useful for the period of this evaluation. As Unit 2 progresses through construction (estimated completion early 1982) an appropriate comparison will be available.

G. Overall Evaluation

Inspection results reflect that the licensee's performance is adequate and average for the region. The licensee is responsive to NRC concerns.



APPENDIX A

4-A-1

FUNCTIONAL AREAS (Construction)

Inspection
Frequency and/or Scope

FUNCTIONAL AREA	Inspection Frequency and/or Scope		
	Increase	No Change	Decrease
1. Quality Assurance, Management & Training		X	
2. Substructure and Foundations		X	
3. Concrete		X	
4. Liner (Containment and Others)		X	
5. Safety-Related Structures		X	
6. Piping & Hangers (Reactor Coolant & Others)		X	
7. Safety-Related Components (Vessel, Internals and HVAC)		X	
8. Electrical Equipment		X	
9. Electrical (Tray and Wire)		X	
10. Instrumentation		X	
11. Fire Protection		X	
12. Preservice Inspection		X	
13. Reporting		X	



(BRANCH CHIEF)

1/12/81

(DATE)

