August 9, 1985

Docket Nos. 50-250
and 50-251

LICENSEE: Florida Power and Light Company

FACILITY: Turkey Point Plant Units 3 and 4

SUBJECT: SUMMARY OF MEETING HELD WITH FLORIDA POWER AND LIGHT COMPANY, AUGUST 1 1985, REGARDING TURKEY POINT PLANT DETAILED CONTROL ROOM DESIGN REVIEW

Background

Members of the NRC staff met with the licensee's representatives at Essex Corporation (licensee's contractor) to review progress in implementing the Detailed Control Room Design Review (DCRDR) task analysis utilizing improved methodology. The improved methodology was discussed with the NRC staff during a meeting held on October 2, 1984. It was agreed at that meeting that an in-progress audit of a task analysis using the Westinghouse Emergency Response Guidelines (ERGs) would be performed at the licensee's contractor's office.

Summary

The licensee demonstrated how the methodology was implemented for ERG E-0, Reactor Trip, describing the process and data collection forms. After reviewing the licensee's Action-Information Requirements Detail (AIRD) form, the staff noted that the licensee had not completed the identification of information requirements characteristics. The "Precision" column had not been filled out and other characteristics such as "Range" were not contained on the form. The staff indicated that the task analysis upgrade program, as implemented for ERG E-0, Reactor Trip, was incomplete. The licensee agreed with the staff and committed to provide the additional information on the appropriate data collection forms.

The staff expressed concern that, based on the August 1, 1985 presentation and ensuing discussion, little progress had been made in nearly ten (10) months since the October 1984 meeting. Of particular significance is the possible impact of this lack of progress on the licensee's commitment to submit the Turkey Point Units 3 & 4 DCRDR Supplemental Summary Report on October 25, 1985. In the staff's view, this date will probably not be met. The licensee agreed to provide a more realistic date and appropriate justification by August 31, 1985. The licensee described their progress relating to other issues to be addressed in the Supplemental Summary Report and indicated that it would be completed by October 25, 1985 as previously agreed upon.

It should be noted that the results of a meeting on July 31, 1985, with the C-E Owner's Group relative to their generic Systems Function and Task Analysis Programs was discussed within the context of the licensee's Task

Analysis Upgrade Program for St. Lucie, Units 1 & 2. The staff indicated that this work meets the requirements of Supplement 1 to NUREG-0737 for generic aspects and that each C-E plant would have to follow through with analysis for plant specific differences. The licensee indicated that they would try to provide more realistic schedules and details for the St. Lucie Units 1 & 2 DCRDR Supplemental Summary Report by August 31, 1985.

The staff also discussed the additional information need in relation to the Turkey Point Plant submittal of their Procedure Generation Package (PGP). A revised PGP should be submitted which will identify all safety significant deviations from the Westinghouse ERGs and justification for the deviations. The submittal should also reference the task analysis previously discussed and their interaction with the PGP effort. Subsequent to the meeting, the licensee informed the Turkey Point Project Manager that the PGP submittal would be provided by September 27, 1985.

The list of attendees and an outline of the licensee's presentation are enclosed.

/s/DGMcDonald

Dan McDonald, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:
As stated

cc w/enclosures:
See next page

ORB#1:DL
CParrish
08/9/85

ORB#1:DL
DMcDonald/ts
08/09/85

J. W. Williams, Jr.
Florida Power and Light Company

Turkey Point Plant

cc:
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Florida Power and Light Company
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Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

TURKEY POINT TASK ANALYSIS

MEETING ATTENDANCE

AUGUST 1, 1985

W. Klein	FPL/JPE
D. Vantassell	FPL/JPE
D. Pilsitz	Essex
R. Kaye	Essex
J. Bongarra	NRC
T. Grozan	FPL
G. Yelliott	FPL Turkey Point
T. Voss	Essex
J. Kramer	NRC/DHFS/HFEB
L. Wilson	NRR/DL/ORB#1
D. McDonald	NRR/DL Project Manager

TECHNICAL APPROACH
FOR
CRDR TASK ANALYSIS AND VERIFICATION
AT
TURKEY POINT, UNITS 3 AND 4

Presented To
Nuclear Regulatory Commission (NRC)

Presented By
Florida Power & Light (FPL)
Essex Corporation

August 1, 1985

TASK ANALYSIS AND VERIFICATION

TASK ANALYSIS

PURPOSE — TO DEVELOP A STATEMENT OF REQUIREMENTS FOR OPERATOR ACTIONS.

METHOD — IDENTIFY OPERATOR TASKS FROM A SUBSET OF THE WESTINGHOUSE OWNERS GROUP (WOG) EMERGENCY RESPONSE GUIDELINES (ERG) REVISION 1.

IDENTIFY INFORMATION AND ACTION REQUIREMENTS NECESSARY TO PERFORM THE OPERATOR TASKS.

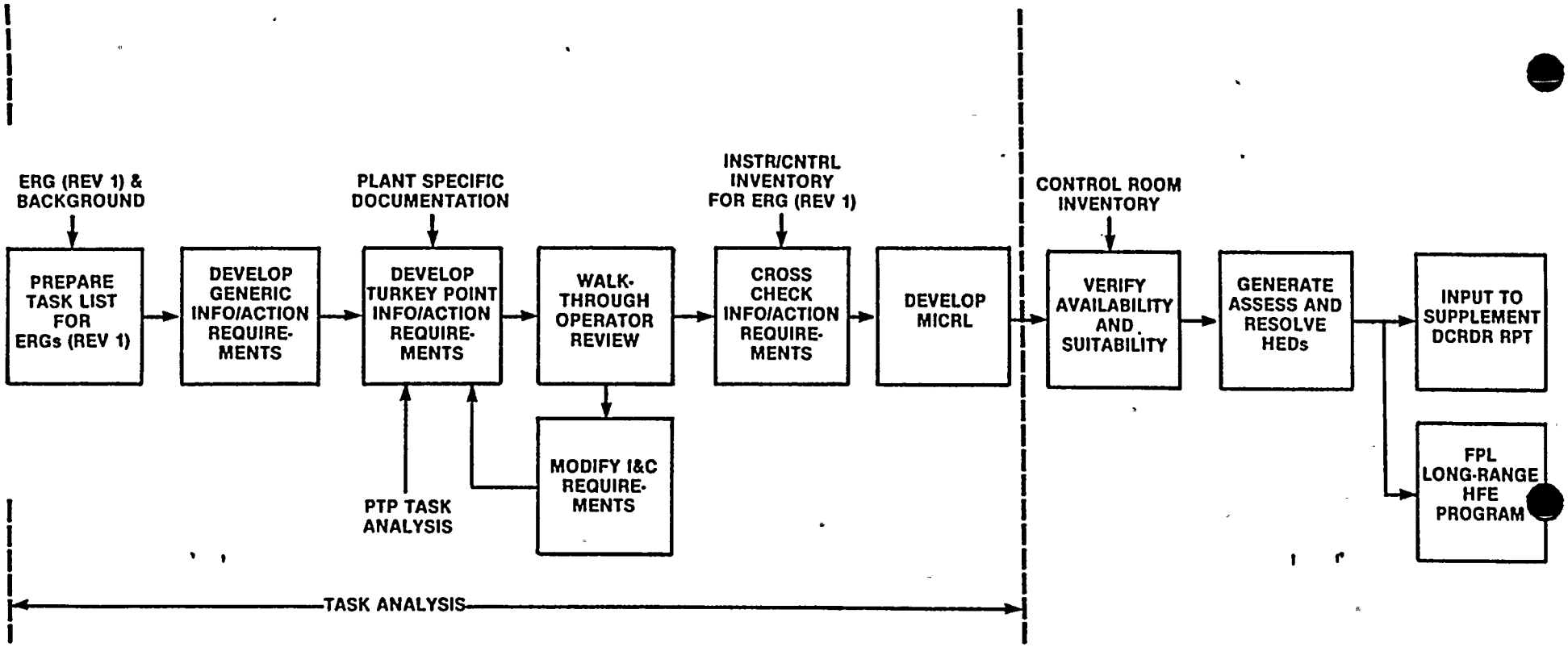
NOTE: INFORMATION AND ACTION REQUIREMENTS ARE DEVELOPED INDEPENDENT OF CONTROL ROOM INSTRUMENTATIONS.

VERIFICATION

PURPOSE — TO VERIFY THAT REQUIRED INSTRUMENTS AND CONTROL ARE AVAILABLE AND COMPATIBLE WITH OPERATOR NEEDS.

METHOD — COMPARE INFORMATION AND ACTION REQUIREMENTS TO CR INVENTORY.

FPL TASK ANALYSIS AND VERIFICATION



ACTION-INFORMATION REQUIREMENTS DETAILS (AIRD)

Sheet _____ of _____

PLANT: _____ UNIT: _____

ORIGINATOR _____ DATE: _____

REVIEWER: _____ DATE: _____

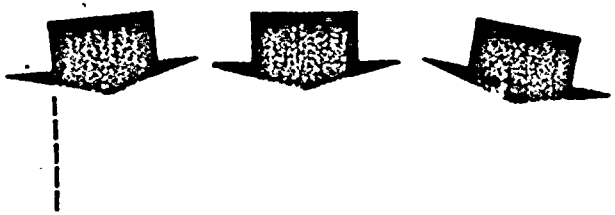
ERG NO: _____

STEP NO: _____

STEP OBJECTIVE: _____

REMARKS:

BEHAVIORAL ELEMENTS											
Action	Verb	System	Component/ Equipment No.	Parameter	Direction	State/Value	Units/Rate	Precision	Trending Required?	Comments	On AIRS Sh.No.



ACTION-INFORMATION REQUIREMENTS SUMMARY (AIRS)

Sheet _____ of _____

PLANT: _____ UNIT: _____

ORIGINATOR: _____ DATE: _____

REVIEWER: _____ DATE: _____

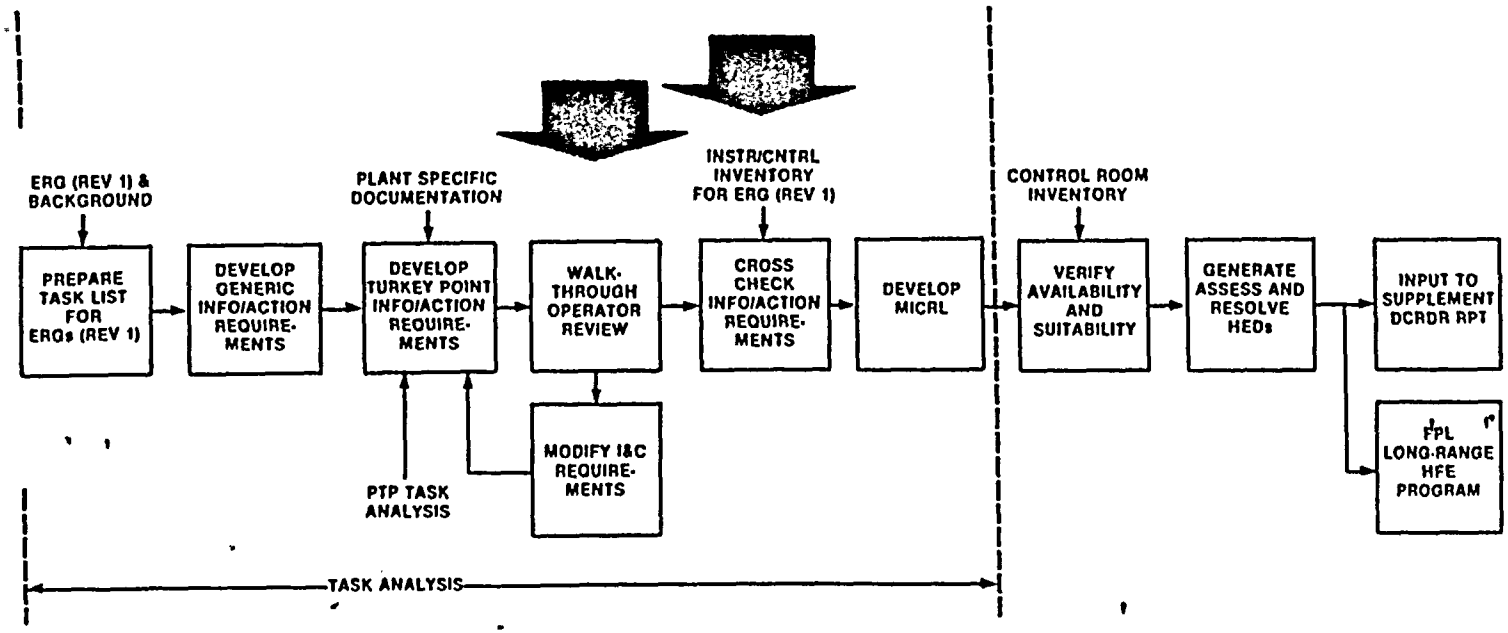
SORT BLOCK
REQS TYPE: Act _____ Info _____
SYSTEM : _____
COMPONENT: _____
PARAMETER: _____

SUMMARY OF REQUIREMENTS BLOCK
VALUE/RANGE: _____
UNITS: _____
PRECISION: _____
RESPONSE TIME: _____

REMARKS:

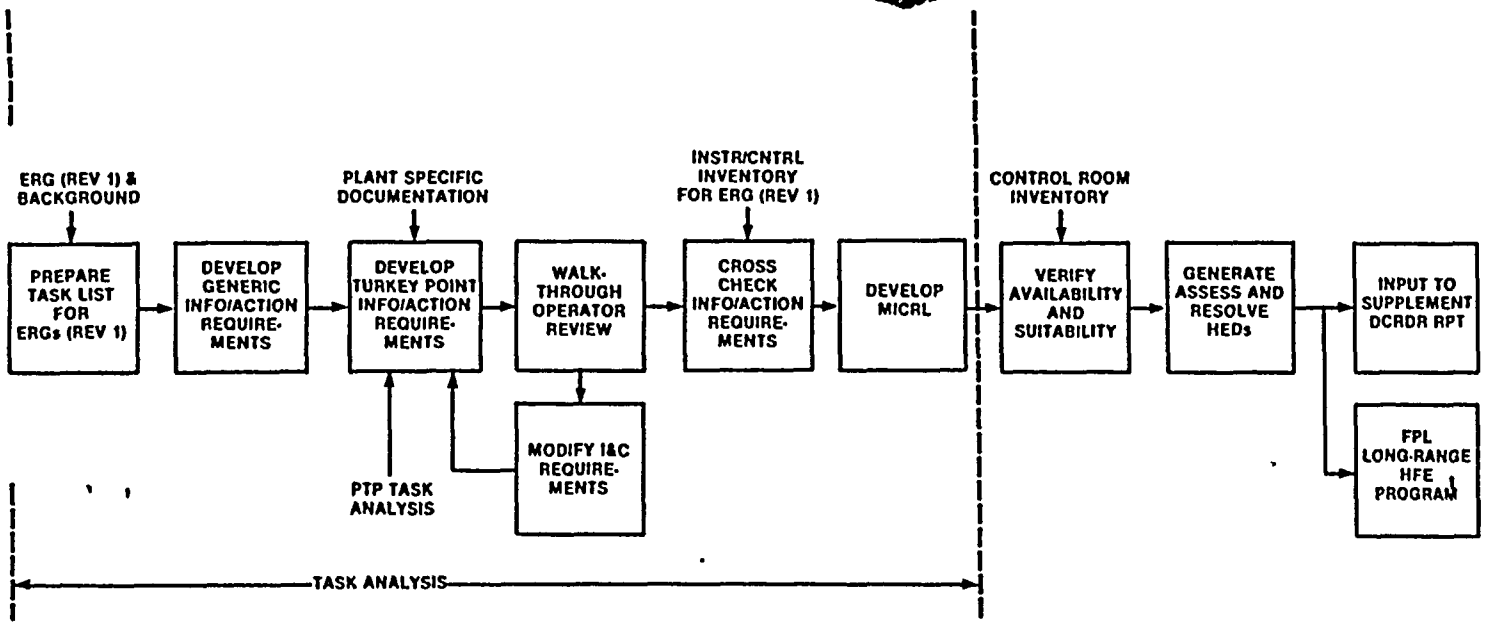
VERIFICATION SUMMARY BLOCK			
DEVICE		PASS	FAIL
I.D. No	PANEL		

INDIVIDUAL DETAILS								
ERG NO.	Step No.	Action	Verb	Direction	State/Value	Units/Rate	Trending Required	Comments



MASTER INFORMATION AND CONTROL REQUIREMENTS LIST

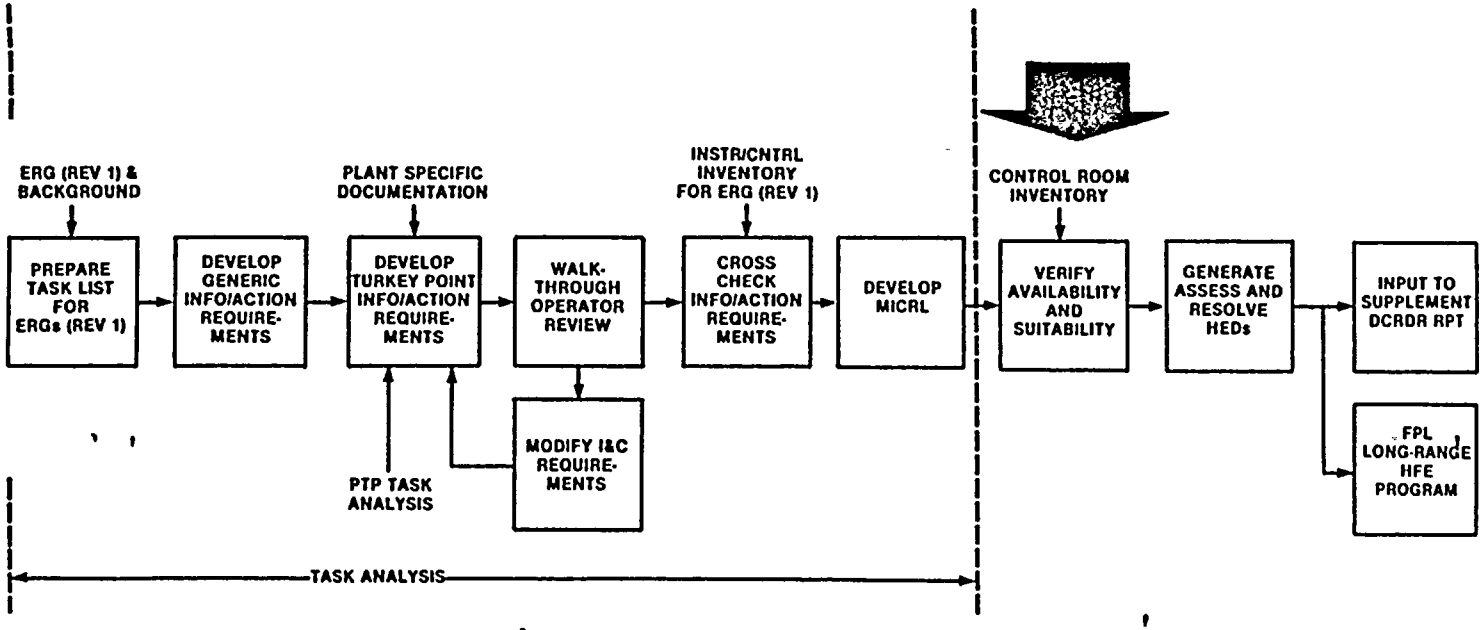
Step Objective:				Required Range Accuracy Position State/Value	Actual Range Accuracy Position State/Value	MCB Section	I & C No.	Remarks		
ERG	Step	Req	Info & Control Req					OK	No.	HED No.



VERIFICATION OF TASK PERFORMANCE CAPABILITIES

AVAILABILITY — CROSS CHECK INFORMATION AND ACTION REQUIREMENTS TO CONTROL ROOM INVENTORY

SUITABILITY — COMPARE REQUIRED INFORMATION AND ACTION CHARACTERISTICS TO CR INSTRUMENTATION AND CONTROL SPECIFICATIONS
e.g. RANGE, PRECISION & UNITS



MEETING SUMMARY DISTRIBUTION
OPERATING REACTORS BRANCH NO. 1

Docket or Central file
NRC PDR
Local PDR
ORB#1 RDG

Steve Varga

OELD
E. Jordan
P. McKee
ACRS (10)
NSIC
Gray file
Plant Service List
C. Parrish
J. Partlow

NRC Participants

D. McDonald
L. Wilson
J. Bongarra
J. Kramer

Attachment to Encl. 1

Docket No.: 50-250/251

MEMORANDUM FOR: D.G. McDonald, Project Manager, DL

FROM: William O. Miller, Chief, LFMB, ADM

SUBJECT: FEE EXEMPT REACTOR APPLICATION FOR LICENSE AMENDMENT OR OTHER APPROVAL

This memorandum pertains to the following application:

Application Date: 5/10/85 Assigned TAC#: 59178/79 License#: DPR-31/-41

Applicant: Florida Power & LIght Company

Plant Name and Unit: Turkey Point 3/4

The above-identified application which you have specified is exempt from fees has been reviewed by the LFMB staff and found to be questionable as an application exempt from the fee requirements of 10 CFR 170. Please inform us by use of the following items, or by a separate memorandum, your basis for your exempt position If additional space is needed, the reverse side of this memorandum may be used.

William O. Miller, Chief, LFMB

---

1. X was approved by Order dated 7/15/85 issued pursuant to 10 CFR 2.204.

2. ____ results specifically from the 2.204 Order dated ____.

3. ____ was issued to simplify or clarify the license or Technical Specifications at NRC's request and solely for NRC's convenience.

4. ____ was (state other reason) ____

The above application was approved on ____ by Amendment No. ____ or by letter, etc.

Date: JUL 29 1985 Signature: Daniel G. McDonald
(Project Manager or Branch Chief)

LFMB determination on the above exemption:

1. ✓ LFMB agrees that the above application is exempt.

2. ____ LFMB does not view this application as being exempt because it:

   a. Does not appear to specifically result from the Order dated ____ because: ____

   Please provide (on reverse side or by separate memo) data to support your position.

   b. Other reason: ____

Signature: William O. Miller (LFMB)
Date: 7/31/85

OK 7/31/85 Lee

(6-20-84)

Attachment C
to Encl. 1

Docket No.: 50-250/251

MEMORANDUM FOR: D.G. McDonald, Project Manager, DL

FROM: William O. Miller, Chief, LFMB, ADM

SUBJECT: FEE EXEMPT REACTOR APPLICATION FOR LICENSE AMENDMENT OR OTHER APPROVAL

This memorandum pertains to the following application:

Application Date: 5/15/85 Assigned TAC#: 59046/7 & 59180/81 License#: 50-250/251 DPR-31/-41

Applicant: Florida Power & Light Company

Plant Name and Unit: Turkey Point 3/4

The above-identified application which you have specified is exempt from fees has been reviewed by the LFMB staff and found to be questionable as an application exempt from the fee requirements of 10 CFR 170. Please inform us by use of the following items, or by a separate memorandum, your basis for your exempt position If additional space is needed, the reverse side of this memorandum may be used.

William O. Miller, Chief, LFMB

---

1. ____ was approved by Order dated _____ issued pursuant to 10 CFR 2.204.

2. X results specifically from the 2.204 Order dated 2/23/84.

3. ____ was issued to simplify or clarify the license or Technical Specifications at NRC's request and solely for NRC's convenience.

4. ____ was (state other reason) _____

The above application was approved on 7/15/85 by Amendment No. ____ or by letter, etc.

Date: JUL 29 1985 Signature: Daniel G. McDonald
(Project Manager or Branch Chief)

LFMB determination on the above exemption:

1. X LFMB agrees that the above application is exempt.

2. ____ LFMB does not view this application as being exempt because it:

a. Does not appear to specifically result from the Order dated _____ because: _____

Please provide (on reverse side or by separate memo) data to support your position.

b. Other reason: _____

OK
lpt
7/31/85
L Lee

Signature: William O. Miller (LFMB)
Date: 7/31/85

(6-20-84)