



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

000 0 0 1987

Report Nos.: 50-250/87-13 and 50-251/87-13

Licensee: Florida Power and Light Company  
9250 West Flagler Street  
Miami, FL 33102

Facility Name: Turkey Point Plant, Units 3 and 4

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Inspection Conducted: March 16-20, 1987

Inspector: James L. Kreh  
J. L. Kreh

4-1-87  
Date Signed

Approved by: Thomas R. Decker  
T. R. Decker, Chief  
Emergency Preparedness Section  
Division of Radiation Safety and Safeguards

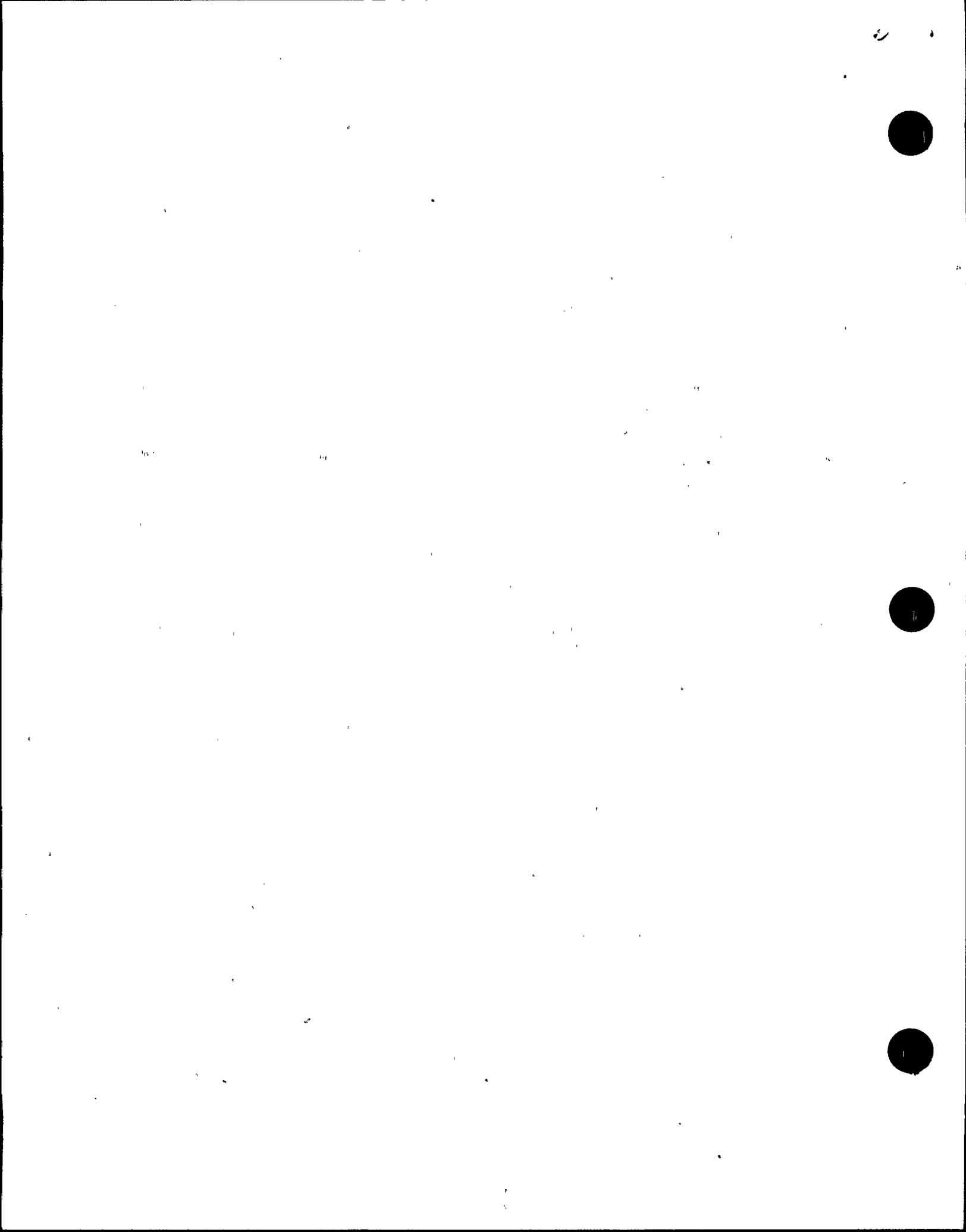
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SUMMARY

Scope: This routine, unannounced inspection involved review and evaluation of the licensee's emergency preparedness program.

Results: No violations or deviations were identified.

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## REPORT DETAILS

## 1. Persons Contacted

## Licensee Employees

- \*C. J. Baker, Plant Manager
- C. M. Wethy, Vice President, Nuclear Plant Site
- \*R. G. Mende, Operations Superintendent (Acting)
- \*L. W. Bladow, Quality Assurance Superintendent
- \*T. A. Finn, Operations Supervisor
- \*F. F. Hayes, Quality Control Supervisor (Acting)
- \*J. J. Maisler, Emergency Planning Manager (Corporate)
- \*G. A. Casto, Emergency Planning Coordinator (Site)
- \*A. W. Taylor, Emergency Planning Technician
- J. D. Evans, Document Control Supervisor
- J. D. Ferrare, Quality Assurance Engineer
- W. R. Lightfoot, Technical Training Coordinator

Other licensee employees contacted included engineers, technicians, operators, and office personnel.

## Nuclear Regulatory Commission

- D. R. Brewer, Senior Resident Inspector
- K. W. VanDyne, Resident Inspector
- \*T. R. Decker, Chief, Emergency Preparedness Section, Region II

\*Attended exit interview

## 2. Exit Interview

The inspection scope and findings were summarized on March 20, 1987, with those persons indicated in Paragraph 1 above. The inspector described the areas inspected and discussed the findings. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the material provided to or reviewed by the inspector during this inspection.

## 3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

## 4. Emergency Plan and Implementing Procedures (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), Appendix E to 10 CFR Part 50, and Section 7 of the licensee's Radiological Emergency Plan (REP), this area was inspected to determine whether significant changes were made to the licensee's emergency preparedness program since the last routine inspection (February 1986) and to assess the impact of

any such changes on the overall state of emergency preparedness at the facility.

The inspector reviewed the licensee's program for making changes to the REP and its implementing procedures. The inspector verified that changes to the REP and procedures were reviewed and approved by management. It was also noted from a review of records that all such changes were submitted to the NRC within 30 days of the effective date, as required.

REP Revision 16, effective January 26, 1987, had not been received for formal review by cognizant staff in the NRC Regional office prior to the inspection. Discussions with licensee representatives and informal review by the inspector indicated that no major changes had been made to the emergency preparedness program via Revision 16. Changes were largely confined to editorial and format adjustments.

The licensee maintained an Emergency Response Directory (a controlled phone list of personnel who may be contacted in a plant emergency) and updated the Directory on a quarterly basis. However, there was no mechanism or procedural requirement in place for expeditiously deleting from the Directory the names of persons whose emergency response qualifications had lapsed. Emergency Procedure (EP) 20201, "Maintaining Emergency Preparedness - Radiological Emergency Plan Training," required that emergency plan training (to include achievement of a score of at least 80 on the associated quiz) be completed by December 31 of each year in order for an individual to be considered qualified for the emergency response organization during the next year. However, examination of the training records of eight key members of the emergency response organization (names selected at random from the current edition of the Emergency Response Directory, dated January 9, 1987) disclosed that two of those individuals were not qualified for their assignments as a result of failing the quiz during their training in late 1986. Licensee representatives did not identify any cogent technical or logistical reasons for failing to delete from the January 9, 1987, edition of the Directory the names of individuals whose emergency plan training had expired as of January 1, 1987. A draft update of the Directory, dated March 9, 1987, had deleted the names of those not currently qualified, but that would not have been considered timely even if it had been issued on that date. Licensee management agreed during the exit meeting to take corrective action to address this matter.

Inspector Follow-up Item (50-250, 50-251/87-13-01): Factoring into each year's January update of the Emergency Response Directory information on individuals disqualified per EP-20201.

The inspector reviewed the licensee's program for distribution of changes to the REP and implementing procedures. Document Control records for 1986 showed that appropriate personnel and organizations were sent copies of changes to the REP and EPs, as required. Current versions of the REP and EPs were observed to be available in the Control Room, Technical Support Center, and NRC Resident Inspector's office.



No violations or deviations were identified.

5. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Pursuant to 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(q), and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's emergency response facilities and other essential emergency equipment, instrumentation, and supplies were maintained in a state of operational readiness.

The inspector toured the onsite emergency response facilities (ERFs) including the Control Room, Technical Support Center (TSC), and Operations Support Center (OSC). The inspector noted that the TSC had become a dedicated facility, and was no longer occupied on a daily basis by office personnel. No other significant ERF changes had been made since the last inspection, according to observations by the inspector and statements by licensee representatives.

The inspector conducted a detailed review of licensee records dated January 1986 to January 1987 to determine compliance with the requirement in REP Section 7.4 that all emergency equipment and instrumentation maintained in the Control Room, TSC, and OSC, as well as field monitoring equipment at the Florida City Substation, was to be inventoried, operationally checked, and inspected at least once each calendar quarter and following each use. The records disclosed that this requirement was being met on a monthly (rather than quarterly) basis.

No violations or deviations were identified.

6. Organization and Management Control (82701)

Pursuant to 10 CFR 50.47(b)(1) and (16), Section IV.A of Appendix E to 10 CFR Part 50, and REP Sections 2 and 7, this area was inspected to determine the effects of any changes in the licensee's emergency organization and/or management control systems on the emergency preparedness program and to verify that such changes had been properly incorporated into the REP and EPs.

The organization and management of the emergency preparedness program were reviewed. The inspector verified that there had been no significant changes in the organization or assignment of responsibility for the plant and corporate emergency planning staffs since the last inspection. The inspector's discussion with licensee representatives also disclosed that there had been no significant changes in the organization and staffing of the offsite support agencies since the last inspection.

A significant change in the emergency response organization resulted from the creation of a new position on the Control Room staff, that of Assistant Plant Supervisor - Nuclear (APSN). The APSN was a Senior Reactor Operator and was designated in the REP (Revision 16) as first alternate to the Plant Supervisor - Nuclear (PSN) for the role of

Emergency Coordinator should the PSN become incapacitated. A brief interview with an APSN on shift verified that individual's understanding of his responsibilities and authorities as Emergency Coordinator.

No other significant changes in the emergency organization or management control systems were disclosed during the inspection.

No violations or deviations were identified.

7. Training (82701)

Pursuant to 10 CFR 50.47(b)(2) and (15); Section IV.F of Appendix E to 10 CFR Part 50, and REP Section 7, this area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities.

The inspector reviewed the description (in REP Section 7) of the training program, training procedures, and selected lesson plans, and interviewed members of the instructional staff. Based on these reviews and interviews, the inspector determined that the licensee had established a formal emergency training program.

Records of training for key members (both licensed and nonlicensed) of the emergency organization for the period January 1986 to March 1987 were reviewed. The training records revealed that those personnel, including some designated as alternates or given interim responsibilities in the emergency organization, were provided with appropriate training, except for the anomalous cases described above in Paragraph 4. According to the training records, the type, amount, and frequency of training were consistent with approved procedures.

The inspector conducted a walk-through evaluation with an individual who was on-shift as PSN. During the walk-through, this individual was given various hypothetical sets of emergency conditions and data and asked to talk through the response he would make if such an emergency actually existed. The individual demonstrated familiarity with emergency procedures and equipment, and no problems were observed in the areas of emergency detection and classification, notifications, and protective action decision-making.

No violations or deviations were identified.

8. Independent Reviews/Audits (82701)

Pursuant to 10 CFR 50.47(b)(14) and (16), 10 CFR 50.54(t), and REP Section 7, this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program, and whether the licensee had a corrective action system for deficiencies and weaknesses identified during drills and exercises.

Records of audits of the program were reviewed. The records showed that an independent audit of the program was conducted by the licensee's Quality Assurance Department from July 25, 1986 to October 1, 1986, and was documented in Audit Report No. QAO-PTN-86-768, dated October 1, 1986. This audit fulfilled the 12-month frequency requirement for such audits. In a separate review (documented in Audit Report No. QAS-EMP-86-2, dated February 2, 1987) by the Quality Assurance Department during the January 1987 exercise, the State and local government interfaces were evaluated. Audit findings and recommendations were presented to plant and corporate management.

The REP and EP-20113 required critiques following exercises and drills. Licensee records showed that critiques were held following periodic drills as well as the annual exercise, that deficiencies and weaknesses were discussed in the critiques, and that recommendations for corrective action were made.

The licensee's program for follow-up action on audit, drill, and exercise findings was discussed. The inspector reviewed the licensee's corrective actions for the findings from the 1985 QA audit of the emergency preparedness program (Audit Report No. QAO-PTN-85-676, dated September 26, 1985). QA documentation indicated that all findings had been satisfactorily resolved by January 3, 1986. Although licensee representatives stated that weaknesses identified in critiques of drills and exercises were corrected, no readily auditable documentation of such corrective actions was available for the majority of critique findings, and such findings were not included in the plant's tracking system (known as CTRAC). Licensee management agreed during the exit meeting to take action to address this shortcoming.

Inspector Follow-up Item (50-250, 50-251/87-13-02): Development of an auditable system for documenting all weaknesses and deficiencies identified in drill and exercise critiques and for tracking the corrective action for each such finding to insure completion.

No violations or deviations were identified.

9. Inspector Follow-up (92701)

- a. (Closed) Inspector Follow-up Item (IFI) 250, 251/79-BU-18: Audibility problems encountered on evacuation of personnel from high-noise areas. In view of the fact that a Notice of Violation on this subject was issued with NRC Report No. 250, 251/86-33, this item is considered duplicative and is therefore administratively closed.
- b. (Closed) IFI 250, 251/85-27-01: Including appropriate Health Physics and Chemistry procedures in the REP implementing procedures. The licensee's concerns regarding the intended scope of this finding were resolved. Licensee representatives agreed to take appropriate corrective action.

10. IE Information Notices (92717)

The following IE Information Notices were discussed with licensee representatives to ensure that receipt, management review, and appropriate corrective action had occurred.

- a. IE Notice 85-44 (Emergency Communication System Monthly Test):  
Review of licensee records indicated that monthly tests of the Emergency Notification System (ENS) were being conducted as required by regulation.
- b. IE Notice 85-80 (Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications):  
The licensee had reviewed this Notice and determined that no action was necessary. Notifications to offsite agencies would normally be made by the PSN as Emergency Coordinator, although the PSN was allowed by procedure to appoint as Designated Communicator any available member of the plant staff who had received communicator training. During the January 1987 exercise, the APSN served as communicator. All licensed operators received training in notifications and communications.

