

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos: 50-335, 50-389, 50-250, 50-251
License Nos: DPR-67, NPF-16, DPR-31, DPR-41
Report Nos: 50-335/97-07, 50-389/97-07, 50-250/97-07
50-251/97-07
Licensee: Florida Power and Light Company
Facilities: St. Lucie and Turkey Point
Location: 925 West Flager Street
Miami, Florida 33102
Dates: June 16-20, 1997
Inspectors: D. H. Thompson, Safeguards Specialist
L. C. Stratton, Safeguards Specialist
Approved by: P. E. Fredrickson, Chief, Special Inspection Branch
Division of Reactor Safety

EXECUTIVE SUMMARY

St. Lucie and Turkey Point Nuclear Plants
NRC Inspection Report Nos: 50-335/97-07, 50-389/97-07,
50-250/97-07 and 50-251/97-07

This routine, announced inspection was conducted in the area of plant support by two Regional Safeguards Specialists.

- o The Fitness For Duty program had undergone significant changes and continued to meet the requirements of 10 CFR Part 26. (S1.3)
- o Fitness For Duty personnel were aware of their individual responsibilities and trained to perform their intended functions. (S1.3.1)
- o The licensee established an effective Fitness For Duty training program for plant personnel. Personnel who were interviewed during the inspection were aware of their responsibilities to detect and report drug and alcohol abuse. (S1.3.2)
- o The licensee's Fitness For Duty collection and processing facilities were being manned by well-trained, highly qualified personnel which had resulted in an almost error free collection process. (S1.3.3)
- o Audit items were reviewed, appropriately assigned, analyzed and prioritized for corrective action by the licensee. The corrective actions taken by the licensee were technically adequate and performed in a timely manner. The Fitness For Duty self-audits were considered a strength of the program. (S1.3.4)



Report Details

IV. Plant Support

S1 Conduct of Safeguards and Security Activities

S1.3 Fitness For Duty

a. Inspection Scope (81052)

The inspectors reviewed the licensee's Fitness For Duty (FFD) program to ensure that significant changes to the program were commensurate with regulatory requirements; had not adversely effected program implementation; and had been incorporated, as appropriate, into the licensee's FFD policies and procedures.

b. Observations and Findings

On July 1, 1996, the responsibility for the FFD program was transferred from Corporate to each Site Security Manager resulting in a significant change to the licensee's FFD program and responsibilities. The inspectors determined, through review and discussion, that the operation of the collection facilities; FFD Coordinator; Administrative Personnel; Medical Review Officer (MRO); Employee Assistance Program (EAP); Training; and audit programs continued to be operated in accordance with regulatory requirements. All significant changes to the FFD program were incorporated into the policies and procedures, as appropriate and remained consistent with the requirements of 10 CFR Part 26. The inspectors determined, through review of licensee procedure IP-1303Q, "Fitness For Duty Program," Revision 0, dated March 31, 1997 and Interdepartmental Procedure 401, Revision 1, dated June 13, 1994, that the licensee had established procedures that were sufficiently clear, delineated the organization and detailed the responsibilities and support program implementation. Additionally, the inspectors noted that as a result of an observation noted during a previous NRC inspection Report, documented in 50-335/96-19 and 50-389/96-19 that the licensee had established in paragraph 5.11, FFD Procedure IP-1303Q, Revision 0, dated March 31, 1997, a clearly written policy for the appeal of positive adulterated drug test results. FFD practices that were in effect were consistent with the licensee's written policies and procedures.

The inspectors determined, during interviews and observation, that a mechanism was in place to disseminate the FFD policy and procedural changes to employees. The inspectors noted that annual training emphasized any-program changes. Also bulletin boards were used to announce FFD issues and concerns.



c. Conclusions

The inspectors determined that the FFD program had undergone significant changes and continued to meet the requirements of 10 CFR Part 26. The reorganization placed the FFD program under the Site Security Managers which had not affected the operation of the FFD program, since both FFD Coordinators were found to be experienced and brought a high degree of professionalism to the program. There were no violations of regulatory requirements noted in this area.

S1.3.1 Fitness For Duty Organization and Management Control

a. Inspection Scope

The inspectors reviewed the FFD organization and management control systems to determine whether changes met regulatory requirements and whether those changes had an adverse effect on the FFD program. Additionally, the inspectors verified that the FFD personnel understood their responsibilities and authorities and were qualified to perform intended functions.

b. Observations and Findings

The inspectors reviewed documentation and interviewed FFD managers and key personnel and determined that through the organizational changes to the FFD program, the Site Security Managers had been assigned the responsibility for administration of the FFD program. The St. Lucie site security manager was aware of the FFD program requirements and was capable of continuing to ensure that the FFD program was operated in accordance with regulatory requirements. The Turkey Point Acting Security Manager was not available for interview during the inspection, however, the site FFD coordinator was very experienced and was personally involved with the FFD program. Therefore, the FFD program continued to be administered in accordance with regulatory requirements.

The selection process for personnel to be tested under the FFD system continued to be administered at the Corporate Office. FFD records were also maintained at the Corporate Office. While reviewing the FFD records at the Corporate Office, the inspectors noted portions of the original documentation in three of the 11 FFD records reviewed concerning positive drug or alcohol tests were missing from the file, i.e., the original laboratory results printout, the results of the laboratory split sample, and MRO evaluations of positive results. The licensee located the missing records while the inspectors were onsite. The missing records were being stored by the MRO, the MRO assistant, or the Site FFD Coordinators. Prior to the completion of this inspection, the MRO sent out a Memorandum directing all original FFD documentation be forwarded to the Corporate Office for inclusion into the FFD files, and that FFD files no longer be stored at any other location.

The responsibilities and authorities of key personnel responsible for the FFD program were delineated in procedures as described above.

The reorganization of the FFD program did not effect the EAP or the Medical Review Officer's (MRO) responsibilities. The MRO continued to receive and review drug test results from the certified laboratory and determined if the results were positive or negative.

The EAP Manager and staff were well qualified and provided a valuable service to approximately 20 personnel annually. The inspectors determined, through discussion and review of available records, that the EAP informed licensee management when an individual's condition constituted a hazard to himself/herself, or others.

c. Conclusion

The inspectors concluded that the FFD organization and management control systems met regulatory requirements and that the reorganization did not adversely affect the FFD program. FFD personnel were aware of their individual responsibilities and were trained to perform their intended functions. There were no violations of regulatory requirements noted in this area.

S1.3.2 Training

a. Inspection Scope

The inspectors interviewed personnel to ensure they were trained in the FFD program requirements; that supervisors were trained and aware of their responsibilities; and that refresher training was provided and taken as required. The inspectors also verified that workers were aware of the licensee's FFD program and policies, understood them, and changes in the licensee's policies and program were effectively communicated to the workers.

b. Observations and Findings

The inspectors verified that the training staff was aware of the FFD program and policy changes and that the current FFD program had been incorporated into the FFD lesson plans for plant workers and supervisors.

The inspectors interviewed personnel and determined that the refresher training was provided as required. The licensee had recently changed the FFD refresher training from computer based to classroom. During interviews, personnel indicated that the classroom was more effective and afforded the opportunity to discuss events and what actions to take. It was also determined that employees, contractors, and vendors, who had been granted unescorted access were aware of the licensee's FFD policies, what was expected of them, the consequences from lack of adherence to the licensee's FFD policies, and the appeal process. The employees were also aware of the hazards

associated with drugs and the misuse of alcohol, the notification and testing process. Also, employees were knowledgeable of the EAP and how it functions. The inspectors determined that personnel understood that if they self-referred to the EAP, retribution would not be taken by the licensee.

Supervision and Managers were interviewed to determine if they were capable of recognizing drug use or abuse of alcohol. The supervisors/managers interviewed believed that the training had prepared them to recognize drug/alcohol abuse. Some personnel thought the annual training could be updated to discuss the latest street drugs and their effects. The inspectors also determined that the workers and supervision were aware of the role of the MRO and EAP.

The inspectors determined that individuals who qualified as escorts were cognizant of the techniques for recognizing drug and alcohol, indications of their use, and capable of recognizing aberrant behavior. Additionally, escorts were aware of their requirements to report concerns of this nature to management or security personnel.

c. Conclusion

The inspectors determined that the licensee had established an effective FFD training program. Personnel who were interviewed during the inspection were aware of their responsibilities to detect and report drug and alcohol abuse. There were no violations of regulatory requirements noted this area.

S1.3.3 Chemical Testing Program

a. Inspection Scope

The inspectors reviewed the chemical testing program to verify that changes made due to the recent reorganization of the FFD program continued to meet regulatory requirements and did not adversely affect the licensee's program.

b. Observations and Findings

The inspectors verified that the licensee delivers each notification for testing to the appropriate supervisor and instructs them to inform the individual no more than two (2) hours before the test is scheduled. Review of documentation revealed that personnel were arriving at the laboratory for testing within their required timeframe. The acceptable drug and alcohol cutoff levels were within regulatory requirements. The inspectors observed two collections and noted that collection personnel were well aware of their responsibilities and each collection observed was conducted in a professional and efficient manner.



The inspectors noted that in the first quarter of 1997, both licensee's had four administrative collection errors which were of minor significance. Additionally, during the recent outage conducted at St. Lucie, FFD personnel processed approximately 800 samples without an error.

c. Conclusion

The licensees FFD collection and processing facilities were being manned by well trained, highly qualified personnel which had resulted in an almost error free collection process. There were no violations of regulatory requirements noted in this area.

S1.3.2 Fitness For Duty Audit Program

a. Inspection Scope

The inspectors reviewed the licensee's audit reports for the FFD program since the last inspection, to determine compliance with NRC requirements and whether the licensee's commitments and corrective actions to resolve identified issues were technically adequate, met regulatory requirements and were implemented in a timely manner.

b. Observations and Findings

The inspectors reviewed the last annual audit of the FFD program which was conducted January 19, 1996 through March 7, 1996 and a Special Assessment of the FPL Fitness for Duty Program which was conducted by an independent auditor November 12 through November 22, 1996. Both audits were thorough and the findings or concerns were corrected or in process of being implemented by the licensee. The inspectors also noted that the licensee had conducted a self-assessment which included a line by line review of 10 CFR 26 requirements; an internal quality assurance review; identification of errors and utilization of conditional reports for corrective action; monthly reviews by the Security Manager of persons who were unavailable for testing, monthly MRO/FFD Coordinator/EAP compliance meetings; and periodic proficiency reviews of test collectors.

c. Conclusion

The licensees FFD audits were complete and effective in terms of uncovering weaknesses in the FFD program, procedures and practices. The inspectors determined that audit items were reviewed, appropriately assigned, analyzed and prioritized for corrective action. The corrective actions taken were technically adequate and performed in a timely manner. The FFD self-audits were considered a strength. There were no violations of regulatory requirements found in this area.



S8 Miscellaneous Security and Safeguards Issues**S8.1 Actions on Previous Inspection Findings (92904)**

(CLOSED) Inspector Follow-up Item (IFI) 50-335/389 96-10-01, Reorganization of FFD Responsibilities.

The reorganization of the FFD program and the associated responsibilities are documented in this report and as noted above, met the requirements specified in 10 CFR 26.

V.MANAGEMENT MEETING**X1 Exit Meeting Summary**

The inspectors presented the inspection results to licensee management at the conclusion of the inspection on June 20, 1997. The licensee acknowledged the findings presented. Although reviewed during this inspection, proprietary information is not contained in this report. Dissenting comments were not received from the licensee.

PARTIAL LIST OF PERSONS CONTACTED**Licensee**

M. Allen, Training Manager, Plant St. Lucie (PSL)
 E. Benken, Licensing Coordinator, PSL
 A. Cunnings, Fitness For Duty Coordinator, PSL
 R. Czarnecki, Security Operations Supervisor, PSL
 J. Denton, Fitness For Duty Coordinator, Plant Turkey Point (PTP)
 D. Fadden, Service Manager, PSL
 G. Hollinger, Licensing Manager, PTP
 J. Muller, Security Bureau Nuclear, PSL
 J. Scarola, Plant General Manager, PSL
 E. Weinkan, Licensing Manager, PSL
 W. White, Security Manager, PSL

NRC

T. Johnson, Senior Resident Inspector, Turkey Point
 M. Miller, Senior Resident Inspector, St. Lucie



INSPECTION PROCEDURES USED

IP 81052: Fitness For Duty Program

ITEMS OPENED, CLOSED, AND DISCUSSED

(CLOSED) IFI 50-335/389/96-10-01