





October 20, 1981 3-0-3-a-2 CS-81-251 #3F-1081-20

Mr. J. P. O'Reilly, Director Office of Inspection & Enforcement U.S. Nuclear Regulatory Commission 101 Marietta St., Suite 3100 Atlanta, GA 30303

Subject: Docket No. 50-302

Operating License No. DPR-72

Ref.: RII:TFS 50-302/81-18

Dear Mr. O'Reilly:

We offer the following response to the violations listed in the referenced report.

NOTICE OF VIOLATION

A. Technical Specification Section 6.4 requires a retraining and replacement training program for the facility staff that meets or exceeds the requirements of Section 5.5 of ANSI N18.1-1971. Section 5.5 requires a training program to maintain proficiency of the operating organization.

Contrary to the above, the facility training program does not provide retraining of security personnel in health physics requirements.

A. Response: Florida Power Corporation agrees with this violation.

The violation stems from the assumption by the Nuclear Operations
Training Department that Health Physics retraining was accomplished
in conjunction with the annual Security retraining required of
Guardforce personnel. This has now been corrected, in that Security Force personnel have been included within the annual retraining
cycle as required for other contractor personnel. The Nuclear
Operations Training Department has established a list of Security
personnel who require Health Physics retraining. This retraining
will be accomplished by January 31st 1982. No further corrective
action is deemed necessary.

B. 10CFR 50, Appendix B, Criterion XVII requires the licensee to establish requirements concerning record retention including location of quality related records. The licensee's accepted QA Program (FSAR) Section 1.7.6.7.1.8 states that ANSI N45.2.9 requirements will be met. Section 5.6 of ANSI N45.2.9 requires that record storage facilities be capable of protection from possible destruction such as fire.

Contrary to the above, storage of quality assurance records are not being maintained in accordance with Section 5.6 of ANSI N45.2.9-1974 in that training records for Nuclear QA/QC personnel are not being stored in fire rated facilities.

B. Response: Florida Power Corporation concurs with the violation as stated, and offers the following:

-All training records for the Nuclear QA/QC Compliance personnel have been transferred to the custody of the Nuclear Document Control Section for storage. This storage meets the requirements of Section 5.6 of ANSI N45.2.9-1974.

-The storage of all future training records will be maintained by Nuclear Operations Document Control.

-Plant Procedures will be revised to reflect this method of maintaining the training records prior to 1 January 1982.

Full compliance has been achieved.

Should there be further questions, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION

Nuclear Plant Manager

Nuclear Support Services

JC/rc