



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

SEP 23 1981

Report No. 50-302/81-18

Licensee: Florida Power Corporation  
 3201 34th Street, South  
 St. Petersburg, Florida 33733

Facility Name: Crystal River 3

Docket No. 50-302

License No. DPR-72

Inspection at Crystal River site near Crystal River, Florida

Inspector: P. H. Skinner Sept. 18, 1981  
 P. H. Skinner Date Signed

Approved by: C. M. Upright 9/18/81  
 C. Upright, Section Chief Date Signed  
 Engineering and Technical Inspection Division

SUMMARY

Inspection on August 31 - September 4, 1981

Areas Inspected

This routine, unannounced inspection involved 36 inspector-hours on site in the areas of non-licensed training, qualification of personnel, and the non-routine reporting program.

Results

Of the 3 areas inspected, no violations or deviations were identified in 2 areas, 2 violations were found in one area (Failure to provide training, paragraph 5.a, and Failure to properly store quality related records, paragraph 5.b).

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

W. Benoist, Catalytic  
\*C. Brown, Compliance Supervisor  
J. Buckner, Security Officer  
\*J. Bufe, Compliance Auditor  
\*B. Crane, Planning Engineer  
\*M. Harmon, Nuclear Operations Administrative Manager  
W. Herbert, Nuclear Technical Specification Coordinator  
V. Hernandez, Nuclear Compliance Auditor  
\*R. Hobbs, General Physics Corporation  
W. Hysell, Security Training Coordinator  
\*W. Kemper, Nuclear Operations Training Manager  
\*K. Lancaster, Senior Quality Auditor  
\*J. Lander, Maintenance Superintendent  
\*S. Mansfield, Nuclear Technical Instructor  
\*P. McKee, Operations Superintendent  
G. Perkins, Plant Health Physicist  
\*D. Poole, Nuclear Plant Manager  
D. Stevens, Nuclear Technical Instructor  
G. Williams, Nuclear QA/QC Supervisor

Other licensee employees contacted included technicians, mechanics, security force members, and office personnel.

#### NRC Resident Inspector

\*T. Stetka, Senior, Resident Inspector

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on September 4, 1981 with those persons indicated in paragraph 1 above. The licensee acknowledged the inspection findings.

### 3. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (302/79-23-06): Inadequate retraining program for non-licensed personnel. The inspector reviewed documentation of the retraining being provided for craftsmen and technicians and concluded that the training is being provided but documentation is not fully implemented. The documentation is being computerized for more accurate storage and greater flexibility in control of on-the-job training.

## 4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. A new unresolved item identified during this inspection is discussed in paragraph E.c.

## 5. Non-licensed Training (41700)

- References:
- (a) AI 200, Organization and Responsibility, dated 4/81
  - (b) AI 600, Conduct of Maintenance, dated 4/81
  - (c) AI 1400, Conduct of Training, Revision 6 dated 5/81
  - (d) ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel
  - (e) Technical Specifications, Section 6
  - (f) MP 601, On-the-Job Training of Maintenance Shop Personnel, Revision 0 dated 12/80
  - (g) QC 200, Training and Qualification of Nuclear Quality Assurance/Quality Control Inspection Personnel, Revision 0 dated 11/79
  - (h) QC-201, Training of Nuclear Compliance Personnel, Revision 1 dated 7/81
  - (i) Accepted Quality Assurance Program - Chapter 1.7, FSAR

The inspector reviewed the training program which provides general employee training and retraining for station personnel. The training program was reviewed to verify that the program complies with commitments and requirements contained in references (a) through (i) and that the program covers training in the areas of general station administrative control, quality assurance policies and procedures, radiological health and safety, industrial safety and first aid, housekeeping and fire prevention and protection, emergency plan and procedures, the use of protective clothing, and prenatal radiation exposure training for females and supervisors. The inspector reviewed approximately 50 training records of station personnel, participated in three hours of classroom training and interviewed six individuals (non-licensed).

Based on this review two violations, one unresolved item, and one inspector followup item were identified and are discussed in paragraph 4.a through d.

## a. Failure to Provide Health Physics Retraining for Security Personnel.

Reference (e) requires a retraining and replacement training program for the facility staff that meets or exceeds the requirements of ANSI N18.1-1971. Section 5.5 of ANSI N18.1 - 1971 requires a training program to be established to maintain the proficiency of the operating organization. As part of the inspection in this area, three security personnel records were reviewed. Of these none had received retraining in the Health Physics area. A discussion with security and training indicated that initial training had been accomplished, but a program

was not established to ensure retraining in this area to maintain proficiency. Although no examples outside the security area were identified, a program to ensure all organizations required to operate and maintain the plant such as subcontractors, Florida Power Cooperation (FPC) personnel, vendors, etc. should be formally established and implemented. This failure to provide retraining to security personnel is a violation (302/81-18-01).

b. Failure to Properly Store Quality Related Records

Reference (i) states that ANSI N45.2.9 - 1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants will be met for storage of quality related records. Training records required by references (g) and (h) are identified as permanent quality assurance records. Those records are being maintained in non-fire rated cabinets in the Nuclear QA/QC Supervisor and Nuclear Compliance Supervisor office areas. This violation was also identified during the PAS inspection conducted in February, 1981. This failure to provide required storage for QA related records is a violation (302/81-18-02).

c. Lack of Documentation of Training and Retraining

10 CFR 50, Appendix B, Criterion XVII requires records of qualification of personnel be maintained. The inspector reviewed 45 general employee training records. Twelve of these records indicated that all required training was not being documented. The training was being performed, however documentation was not available to substantiate this training. Discussions with these personnel determined that the training was attended by the individuals concerned. The Training Manager informed the inspector that FPC is in the process of transferring documentation of all general employee training to a microfiche system which will provide required documentation of the training and retraining program.

Previous inspections (Inspection Reports 79-23, 80-30, and 81-02) had identified a lack of on-the-job training and documentation of this training for nonlicensed craft personnel. It appears that training is being provided in this area and some documentation is available to support this finding. This is presently being documented in accordance with requirements contained in reference (f). Discussions with the Maintenance Superintendent indicated that FPC is in the process of revising reference (f) to incorporate this information into a computer system to more efficiently control and document this requirement.

Based on the inspector's conversations with the Training Manager and Maintenance Superintendent and the commitment to have all training records entered into the microfiche system and this system in effect by January 1, 1982, this item will be categorized as unresolved in subsequent inspections of this area (302/81-18-04).

d. Expiration of Certification of Quality Control Inspectors

Reference (g), section 6.3.1 requires successful completion of required training be documented on a qualification certificate. Certification forms indicate that the certification remains effective for a period of one year. A review of three quality control inspectors records indicate this certification had exceeded the one year period without recertification being accomplished. A discussion with the Nuclear QA/QC Supervisor indicated that these personnel have been actively performing QC inspections and that this was an oversight on the part of the supervisory personnel. This area will be reviewed in a subsequent inspection and is identified as an inspector followup item (302/81-18-03).

6. Qualification of Personnel (36701)

- References:
- (a) Technical Specifications, Section 6.3, Facility Staff Qualification
  - (b) ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel
  - (c) Regulatory Guide 1.8, Personnel Selection and Training, September 1975

The inspection verified by review of administrative controls that minimum educational, experience and/or qualifications have been established for the following plant positions: Nuclear Operations Superintendent, Assistant Plant Manager, Nuclear Maintenance Superintendent, Chemistry/Radiation Protection Manager, Nuclear Technical Services Superintendent, Nuclear Technical Specifications Coordinator, Nuclear Modification Specialist, Nuclear Reactor Specialist and Nuclear Maintenance Staff Engineer. The inspector also reviewed the qualifications of approximately ten additional personnel in positions below the plant supervisory level.

Based on this review, no violations or deviations were identified.

7. Nonroutine Reporting Program (90714)

- References:
- (a) CP-111, Procedure for Documenting, Reporting, and Reviewing Nonconforming Operations Reports, Revision 18 dated 7/81

The inspector reviewed reference (a) to verify that administrative controls for nonroutine reporting events meet the following criteria:

- Controls have been established for the prompt review and evaluation of off-normal events to assure identification of safety-related events
- Controls have been established for the prompt review of planned and unplanned maintenance and surveillance testing activities to assure identification of prospective or actual violations of limiting condition for operation requirements of the Technical Specifications

- Controls have been established for reporting safety-related events internally and to the NRC
- Controls have been established for completion of corrective actions relating to safety-related operating events
- Controls contain provisions for recognition and reporting of events that are covered by 10 CFR Part 21
- Responsibility for implementing these administrative controls has been established

The inspector also reviewed the licensee's program for handling NRC and vendor circulars and bulletins.

Based on this review, no violations or deviations were identified.