



February 2, 1976
L-76-43

Mr. Norman C. Moseley, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
230 Peachtree Street, N. W., Suite 818
Atlanta, Georgia 30303

Dear Mr. Moseley:

Re: IE:II:AKH
50-250/75-17
50-251/75-17

Florida Power & Light Company has examined the subject inspection report which noted the following items of noncompliance:

- A. "Contrary to Technical Specification 6.13.1.a, a High Radiation area was observed on December 11, 1975 to be improperly barricaded in that drums of radioactive waste in a fenced area outside the auxiliary building were roped off such that the radiation level at the barricade was approximately 200 millirem, whereas the limit is 100 millirem per hour."
- B. "Contrary to 10 CFR 50.54 (i-1), certain aspects of the Licensed Operator Requalification Program have not been performed and/or documented in accordance with the provisions of implementing Administrative Procedure No. 0301."

Our response to each item is as follows:

- A. The subject barricade was expanded outward approximately nine inches further away from the drums. The radiation levels at the new barricade position were less than or equal to 100 mrem/hr. The drums are now properly barricaded. In addition, the Turkey Point Health Physics Supervisor has instructed Health Physics Department personnel on the importance of adhering to regulations governing the posting of radiation areas.
- B. Four examples supporting this item of noncompliance were listed in the inspection report:

8212290124 821130
PDR FOIA
SCHLISS82-534 PDR

- (1) "Step 8.1 of AP 301 requires a quiz covering each lecture and a grade of less than 80% requires further study and an additional quiz. Although the annual lecture series is nearing completion, training department records indicate that a number of licensed operators (12) had taken only one quiz, and some operators (7) had not taken any quizzes. Although some operators had received less than 80% on a quiz, no additional quizzes had yet been given. The quiz and additional quiz requirements of Step 8.1 were not being satisfied and documented."

Requalification lecture periods are scheduled so that each operating shift receives one lecture session every five weeks. Quizzes are scheduled to be given after every second lecture session. If an individual misses a quiz, he is rescheduled to take the quiz at some later date, usually on the next regularly scheduled quiz day. However, conflict between refueling schedules and requalification schedules has caused some requalification lecture periods and quizzes to be postponed until after refueling. It is our position that this does not oppose the intent of AP 301.

At the time of the I & E inspection, there were some individuals who were behind the quiz schedule, but the Training Department was aware of it and plans had been made to bring all licensed operators up to date with the quiz schedule before the end of the requalification year (March 31, 1976).

At the present time, six individuals have not completed or scored higher than 80% on all of their requalification quizzes. These individuals comprise 12% of the licensees at Turkey Point. Arrangements have been made to ensure that these individuals will be up to date with respect to the quiz schedule by the end of this requalification year. If by that time a licensee is not up to date, he will not be eligible for licensed duties until such time as he satisfactorily completes all required quizzes.

- (2) "Step 8.2.1 of AP 301 requires all operators to perform or direct a minimum of 10 reactivity changes over a two-year cycle. Figure 2, "Log of Reactivity Changes", gives detailed instructions and requires that these changes be recorded and signed by a supervisor. Steps 5.3.3 and 5.4.2 require that these logs be kept and maintained.

Upon review of these records, approximately one half of them were not up to date or blank. The reactivity log sheets were not being kept as required by AP 301."

AP 301 requires shift personnel to maintain reactivity change log sheets in the Shift Supervisor's office. At the time of the I & E inspection, seven individuals had blank log sheets on file in the Shift Supervisor's office. However, all of these individuals were non-shift personnel who were keeping separate log sheets at their work locations.

The reactivity log sheets are used to determine if each licensee has acquired the necessary reactivity changes during the course of his two year license period. If he has not, simulator time must be purchased to satisfy the necessary requirements. From January, 1975 to January, 1976, there have been over 100 major reactivity changes (startup, shutdowns, and trips). Assuming each shift shared equally in these evolutions, the number of reactivity changes acquired by each licensee on shift is approximately 20 during 1975. Many licensed operators had logged 10 reactivity changes early in the year but had not bothered to log subsequent reactivity changes.

These individuals have been requested to update their reactivity log sheets. To help ensure that this is accomplished, surveillance of Control Room log sheets will be increased. All reactivity change log sheets will be brought up to date by the end of the requalification year (March 31, 1976).

- (3) "Step 8.2.3 of AP 301 requires performance evaluations to be made of licensed operators during simulated or actual emergency/abnormal situations. These evaluations should normally be made by the plant supervisor for his assigned operators and documented on Figure 3, "Performance Evaluation - Abnormal and Emergency Procedures." Unsatisfactory performance requires special training sessions followed by a re-evaluation. Upon review of the evaluation records, the inspector found that the most recent documented operator evaluation was performed in December, 1974. Performance evaluations were not being documented as required by Step 8.2.3."

Performance evaluation sheets are supposed to be available in the Control Room for use by shift supervisors in evaluating the performance of licensed operators under emergency or abnormal conditions. It has been determined that, when the 1974 forms were removed from the Control Room for storage in Document Control, no new forms were provided.

1975 operating records have been reviewed and it has been documented which licensed operators were involved in each off-normal occurrence. The performance of each operator has been evaluated by the appropriate shift supervisor. In addition, the Training Department schedules simulated performance evaluations for all licensed operators and, at the time of the I & E inspection, had scheduled such training for the last three months of the requalification year (January through March, 1976). Performance evaluations are currently 90% complete and 100% completion is planned by March 31, 1976.

Performance evaluation sheets are now available in the Shift Supervisor's office for use in evaluating operator performance during actual emergency/abnormal situations. Although such sheets were not available in the Control Room during 1975, this does not mean that poor performance went unnoticed. Such performance receives immediate attention and if necessary special topics are added to the requalification lectures to help correct problems.

- (4) "Step 8.2.2 of AP 301 requires plant supervisors to discuss applicable plant changes and modifications, abnormal occurrences, FSAR Supplements, technical specification changes and procedure revisions with all licensees on their shifts. Figure 1, "Training Report", documents this effort for each item. The inspector reviewed the licensee's document control records in this area and found that almost all the information issued since December, 1974 still required review by one or more operators. All licensees are not being appraised of significant operator related information as required by Step 8.2.2."

The document review process will be changed and AP 301 will be revised to incorporate the change. The documents discussed above will be filed in each of two binders. One binder will be maintained in the Control Room and the second binder will be assigned to the Training Department.

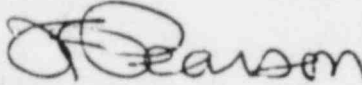
Mr. Norman C. Moseley, Director, Region II
Page Five
February 2, 1976

Review signature sheets will be kept in the Control Room binder for use in documenting licensee review. The new review process will be in effect and AP 301 will be revised by April 30, 1976.

In addition, it is planned to have all personnel who are expected to continue as licensed operators satisfy the document review requirements of AP 301 and bring themselves up to date by reviewing all documents which they may have missed during the current equalification year. The projected date for satisfying the review requirements is April 30, 1976.

No proprietary information has been identified in the subject inspection report.

Very truly yours,

RE 
Robert E. Uhrig
Vice President

REU/MAS/cpc

cc: Jack R. Newman, Esquire