

NRC REGION II
ATLANTA, GEORGIA

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March 31, 1983
L-83-204

Mr. James P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: St. Lucie Unit 1
Docket No. 50-335
IE Inspection Report 83-02

Florida Power & Light Company has reviewed the subject inspection report and a response is attached.

There is no proprietary information in the report.

Very truly yours,

A handwritten signature in cursive script that reads "Robert E. Uhrig".

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PLP/js

Attachment

cc: Harold F. Reis, Esquire
PNS-LI-83-239/1-5

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PDR ADOCK 05000335
G PDR

ATTACHMENT

RE: ST. LUCIE UNIT 1
DOCKET NO. 50-335
IE INSPECTION REPORT 83-02

Finding A

10 CFR 55, Appendix A, Section 3.c, requires each licensed operator and senior licensed operator to be cognizant of facility design changes, procedures changes, and facility license changes. Administrative Procedure No. 0005/20, Licensed Operator Requalification Program, Revision 9, Paragraph 7.1, implements this requirement by requiring acknowledgement of each plant change/modification, reportable occurrence, FSAR supplement, facility license amendment, and applicable procedure changes. This acknowledgement is documented by initials of the licensed operator on a Training Report (TR) for each document posted.

Contrary to the above, all licensed operators are not cognizant of facility design changes, procedure changes, and license changes. Approximately 20 TRs issued from May 1982 to October 1982 contained changes that had not been acknowledged by each licensed operator. The individual TRs selected for inspection had not been initialed by as few as one and by as many as sixteen licensed operators. Specific changes were discussed with two senior reactor operators; neither operator had reviewed these changes and neither operator was familiar with the plant changes described in the selected TRs.

Response

1. FPL concurs with the finding.
2. The finding occurred due to inadequate attention to follow-up of review status and because the present system is cumbersome and difficult to administer to ensure timely review by plant operations personnel.
3. Immediate steps were taken by the Operations Supervisor to obtain review of the material by responsible individuals.
4. As corrective action to prevent future problems, we are re-evaluating our present system for reviews and will revise the program as necessary by July 31, 1983, to provide a workable and effective solution.
5. We will have a more effective method to familiarize licensed operators with changes in design, procedure and the license by July 31, 1983.

Finding B1

10 CFR 50 Appendix, Criterion V and the Accepted QA Program (FPL-NQA-100, Revision 5) require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures.

Administrative Procedure No. 0005720, Licensed Operator Requalification Program, Revision 9, Paragraph 8.3.2, requires written requalification examinations to be administered on an annual basis to each licensed individual.

Contrary to the above, two licensed senior reactor operators had not received written requalification examinations during the 1982 requalification period.

Response

1. FPL concurs with the finding.
2. The finding occurred because the procedure was not interpreted to require a maximum of 12 calendar months between examinations. The time between exams for the operators was not being tracked due to an administrative error.
3. Upon notification, as corrective action, both SRUs were removed from licensed duties and given the missed exams. Both SROs have passed the exam and returned to duty.
4. An examination date tracking system has been established to ensure exams are given to licensed personnel as required.
5. Full compliance was achieved on March 14, 1983.

Finding B2

Quality Instruction 17-PR/PSL-1, Quality Assurance Records, Revision 4, Paragraph 5.3.4.2, requires that temporary storage of records shall be in fireproof cabinets (1-hour rating) or some other area that meets the requirements of the Final Safety Analysis Report.

Contrary to the above, a training record for one quality control (QC) person had been stored in the QC Department Training Coordinator's desk since about November 1982.

Response

1. FPL concurs with the finding.
2. The finding occurred due to personnel oversight.
3. As corrective action the document was completed and placed in proper storage.

4. In order to prevent future problems, the responsible individual has been reinstructed to comply with existing instructions.
5. Full compliance was achieved on March 15, 1983.

Finding B3

Administrative Procedure No. 0005731, Electrical Maintenance Training Program, Revision 1, Paragraph 4.3, requires the Electrical Department Training Coordinator to submit to the training supervisor a proposed training schedule in advance of each month identifying the training to be conducted for the month. At the end of each month, a training report shall be submitted identifying the training that was conducted.

Contrary to the above, the training reports for this department had not been submitted since September 1982.

Response

1. FPL concurs with the finding.
2. The finding occurred because the responsibility for these reports was not firmly established.
3. As corrective action, the missing reports for October, November, and December 1982 were updated.
4. To prevent future problems, the responsibility for these reports has been firmly established and a filing system was instituted which will prevent missed monthly reports.
5. Full compliance was achieved in January 1983.

Finding B4

Administrative Procedure No. 0005727, QC Department Training Program, Revision 1, Paragraph 8.9, requires preparing a QC training schedule each year. This schedule is required to show time intervals to be used for study prior to examinations required for maintenance of qualifications.

Contrary to the above, a 1983 schedule had not been prepared and the 1982 schedule did not identify time intervals to be used for study prior to examination required for maintenance of qualifications.

Response

1. FPL concurs with the finding.
2. The finding occurred due to personnel oversight.
3. As corrective action, the 1983 QC training schedule has been issued with appropriate intervals assigned for study.

4. To prevent future problems, the responsible individual was reinstructed to comply with existing instructions.
5. Full compliance was achieved March 15, 1983.