



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

Report Nos: 50-335/83-02 and 50-389/83-09

Licensee: Florida Power and Light Company  
9250 West Flagler Street  
Miami, FL 33101

Docket Nos: 50-335 and 50-389

License Nos: DPR-67 and CPFR-144

Facility Name: St. Lucie 1 and 2

Inspection at St. Lucie site near Ft. Pierce, Florida

Inspectors: C.M. Upright for  
G. A. Belisle

2/24/83  
Date Signed

C.M. Upright for  
P. H. Skinner

2/24/83  
Date Signed

Approved by: C.M. Upright  
C. M. Upright, Section Chief  
Engineering Programs Branch  
Division of Engineering and Operational Programs

2/24/83  
Date Signed

#### SUMMARY

Inspection on January 24-28, 1983

#### Areas Inspected

This routine, unannounced inspection involved sixty inspector-hours on site in the areas of QA program review, training, requalification training, QA/QC administration, and qualification of personnel.

#### Results

Of the five areas inspected, no violations or deviations were identified in three areas; two violations were identified in two areas (Failure to follow procedures required by the training program, Paragraphs 6 and 7.b; Failure of licensed operators to be cognizant of facility design changes, procedure changes, and facility license changes, Paragraph 7.a).

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

E. Becker, Quality Control Department Training Coordinator  
T. Coxe, Health Physics Department Training Coordinator  
\*P. Fincher, Training Supervisor  
R. Mayhew, Electrical Maintenance Department Training Coordinator  
\*C. Pell, Reactor Engineering Supervisor  
\*N. Roos, Quality Control Supervisor  
J. Rudy, Administrative Supervisor  
\*G. Spodick, Training Department  
L. Spodick, Reactor Engineering Department Training Coordinator  
\*C. Wethy, Plant Manager

Other licensee employees contacted included technicians, operators, and office personnel.

#### NRC Resident Inspector

\*H. Bibb

\*Attended exit interview

### 2. Exit Interview

The inspection scope and findings were summarized on January 28, 1983, with those persons indicated in Paragraph 1 above. The licensee acknowledged the following inspection findings:

Violation 335/83-02-01; Failure of licensed operators to be cognizant of facility design changes, procedure changes, and license changes, Paragraph 7.a.

Violation 335/83-02-02; Failure to follow procedures - multiple examples in training areas, Paragraph 6 and 7.b.

### 3. Licensee Action on Previous Enforcement Matters

Not inspected.

### 4. Unresolved Items

Unresolved items were not identified during this inspection.

## 5. QA Program Review (35701)

The references used throughout this report were reviewed to verify that the licensee's QA program is conducted in accordance with regulatory requirements and industry guides or standards.

The inspector verified by direct questioning of licensee personnel and reviews of licensee procedures that personnel are aware of changes to the accepted QA Program (FPL-NQA-100, Topical Quality Assurance Report, Revision 5) and that licensee procedures clearly define this program.

Within this area, no violations or deviations were identified.

## 6. Training (41700, 41301)

- References:
- (a) Technical Specifications, Section 6.4, Training
  - (b) Regulatory Guide 1.8, Personnel Selection and Training, Revision 1
  - (c) Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Revision 2
  - (d) Regulatory Guide 8.13, Instruction Concerning Prenatal Radiation Exposure, Revision 1
  - (e) ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel
  - (f) ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants
  - (g) TQR 2.0, Quality Assurance Program, Revision 3

The inspector reviewed the licensee's training program required by references (a) through (g) to verify that activities were conducted in accordance with regulatory requirements, industry guides or standards, and Technical Specifications. The following criteria were used during this review:

- The program complies with regulatory requirements and licensee commitments.
- The program covers training in the areas of administrative controls and procedures, radiological health and safety, industrial safety, security procedures, the emergency plan, quality assurance, firefighting, and prenatal radiation exposure.

- The QC personnel training program includes indoctrination in company policies, Quality Assurance Manuals, Technical Specifications, Safety Manual, Emergency Plan, and appropriate codes and standards.

The documents listed below were reviewed to verify that previously listed criteria had been incorporated into licensee training activities:

- QP 2.5, Quality Assurance Indoctrination and Training, Revision 4
- QI 2-PR/PSL-2, Indoctrination and Training of St. Lucie Plant Personnel, Revision 8
- AP 0005727, QC Department Training Program, Revision 1
- AP 0005728, Reactor Engineering Department Training Program, Revision 1
- AP 0005729, Fire Protection Training, Qualification and Requalification, Revision 0
- AP 0005730, I&C Department Training Procedure, Revision 2
- AP 0005731, Electrical Maintenance Training Program, Revision 1
- AP 0005732, Outage Management Training Program, Revision 0
- AP 0005733, Mechanical Startup Training Program, Revision 1

The inspector reviewed training records of approximately twenty personnel assigned to St. Lucie as permanent personnel or temporary personnel that were allowed unescorted access to the site. All records reviewed indicated that the personnel had received the specified training and retraining.

Based on this review, three examples of items were identified which are combined with the item discussed in Paragraph 7.b to constitute a violation. 10 CFR 50 Appendix B, Criterion V and the accepted QA Program (FPL-NQA-100, Revision 5) TQR 5.0, require that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. During this review several areas were identified where procedures were not followed. Examples of these areas are as follows:

- QI 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 hr. rating) or some other area which meets the requirements of the FSAR. A training record of one QC person was being stored in the QC Department Training Coordinators (DTC) desk and not in a fireproof cabinet. A similar violation was addressed in Inspection Report Number 50-335/81-15. This previous violation was corrected by the purchase of fireproof cabinets for the temporary storage of training records and these cabinets are being used to store most required records. This example appears to be an isolated case.

- b. AP 0005731, Electrical Maintenance Training Program, Revision 1, Paragraph 4.3, requires the electrical DTC to submit to the Training Supervisor a proposed training schedule one month in advance and a status report of training performed at the end of each month. The training reports for this department had not been submitted to the Training Supervisor since September 1982.
- c. AP 0005727, QC Department Training Program, Revision 1, Paragraph 8.9, requires preparing a QC Training Schedule each year. This schedule will show time intervals to be used for study prior to examinations required for maintenance of qualifications. The QC Training Schedule for 1982 did not show time intervals to be used for study prior to examination. A 1983 schedule had not been prepared as of the date of this inspection.

The examples cited above are not intended to be all inclusive. These examples are combined with the item identified in Paragraph 7.b and collectively constitute a violation for failure to follow training procedures (335/83-02-02).

#### 7. Requalification Training (41701)

- References:
- (a) 10 CFR 55, Appendix A, Requalification Programs for Licensed Operators of Production and Utilization Facilities.
  - (b) NUREG-0737, Clarification of TMI Action Plan Requirements.
  - (c) Technical Specification Section 6.4, Training.
  - (d) Administrative Procedure No. 0005720, Licensed Operator Requalification Program, Revision 9.

The inspector reviewed the licensee's requalification training program required by references (a) through (c) to verify that activities were conducted in accordance with regulatory requirements and Technical Specifications. The following criteria were used during this review:

- Determination if changes made to the requalification training program were in conformance with NRC requirements.
- Documentation that required procedure reviews were performed.
- Lesson plans are prepared for subject matter presented during the requalification program.

- Determination that all aspects of the requalification program were being adequately addressed.

Reference (d) identifies the licensee's requalification program. The inspectors reviewed the requalification program to determine adherence to the requirements identified by that program. The inspectors reviewed the following areas: retraining conducted in 1982 and to date in 1983; annual written examinations and individual's responses; documentation of required control manipulations; schedule for conducting lectures and prepared lesson plans; and, participation in an accelerated training program when applicable. The training records of eight licensed operators were reviewed.

Based on this review, one violation and one item contributing to a violation were identified and are discussed in Paragraphs 7.a and 7.b below.

- a. Failure of Licensed Operators to be Cognizant of Facility Design Changes, Procedure Changes, and Facility License Changes.

Section 3.c of reference (a) requires each licensed operator and senior licensed operator to be cognizant to facility design changes, procedure changes, and facility license changes. This requirement is implemented by Paragraph 7.1 of reference (d) which requires a copy of each plant change/modification (or summary thereof), reportable occurrence, FSAR supplement, facility license amendment, and applicable procedure changes be sent to the control room and to the Training Department. These documents are maintained in a loose-leaf binder for the receipt of these Training Reports. Each licensed operator is required to review these documents and so indicate by initialing the acknowledgement section of the Training Reports cover letter associated with each posting. A review of the Training Report in the control room identified documents dating from May 18, 1982 to October 20, 1982. Approximately 20 of these documents were reviewed. Each of these Training Reports indicated from one to sixteen licensed operators had not acknowledged these changes. The inspectors discussed several of the specific changes with two senior licensed operators and they were not cognizant of the changes. This failure to be cognizant to changes to facility design changes, procedure changes, and facility license changes constitutes a violation (335/83-02-01).

- b. Failure to Follow Procedures - Failure to Take Licensed Operator Requalification Examination Within the Prescribed Frequency.

Section 8.3.2 of Reference (d) requires written examinations to be administered on an annual basis to each licensed individual. A review of the training records of two licensed senior reactor operators indicated that neither had received the required requalification examination in 1982 and a total of approximately 17 months had lapsed since these individuals had taken their last annual requalification

examination. These individuals are not normally assigned to the operations department, but maintain their licenses for the purpose of providing backup capability to the operating staff. This failure to follow procedure is combined with the items detailed in Paragraph 6.0 to collectively constitute a violation (335/83-02-02).

#### 8. QA/QC Administration (35751)

- References:
- (a) 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
  - (b) FSAR Section 3.2, Classification of Structures, Systems and Components
  - (c) AEC Safety Guide 29, Seismic Design Classification, June 7, 1972
  - (d) FPL-NQA-100, Topical Quality Assurance Report, Revision 5

The inspector reviewed the licensee's QA/QC administration program as required by References (a) through (d) to verify that activities were conducted in accordance with regulatory requirements and industry guides or standards. The following criteria were used during this review:

- The licensee's QA program documents clearly define those structures, systems, components, documents and activities to which the QA program applies.
- Procedures and responsibilities have been established for making changes to those documents.
- Administrative controls have been established for QA/QC procedures that assure review and approval prior to implementation; methods for changes and revisions to procedures; and methods for distribution and recall.
- That administrative controls have been established to assure overall review of the effectiveness of the QA program.
- That administrative controls have been established to modify the QA program to provide emphasis on identified problem areas.

The documents listed below were reviewed to verify that previously listed criteria were incorporated into the licensee's QA/QC administration program.

- QP 2.2, Revision of the Topical Quality Assurance Report, Revision 3
- QP 2.3, Preparation and Revision of Quality Procedures, Revision 5

- QP 2.4, Preparation and Revision of Quality Instructions; Revision 3
- QP 2.7, Identification of Safety Related Structures, Systems and Components, Revision 1
- QP 5.1, Operating Plant Procedures, Revision 3
- QP 16.1, Corrective Action, Revision 5
- QP 18.1, Conduct of Quality Assurance Department Quality Audits, Revision 6
- QI 2-PR/PSL-1, Quality Assurance Program, Revision 5
- QI 5-PR/PSL-1, Preparation, Revision, Review/Approval of Procedures, Revision 22
- QI 16-PR/PSL-1, Corrective Action, Revision 12
- QI 18-PR/PSL-2, Quality Control Surveillances, Revision 8
- QI 18-PR/PSL-3, Quality Control Monitoring, Revision 2

Within this area, no violations or deviations were identified.

#### 9. Personnel Qualification Program (36701)

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

The inspector reviewed the licensee's program relating to the qualification of personnel as required by References (a) through (c). The documents listed below were reviewed to assure that administrative controls had been established that identified the minimum educational, experience or qualification requirements for various plant operations personnel:

- QI 1-PR/PSL-1, Plant Organization, Revision 9
- QI 1-PR/PSL-2, Operations Organization, Revision 5
- QI 1-PR/PSL-3, Instructions for Maintenance Organization, Revision 5

- QI 1-PR/PSL-5, Technical Staff Organization, Revision 0
- QI 1-PR/PSL-7, Quality Control Organization, Revision 4
- QI 1-PR/PSL-8, Administrative Organization, Revision 0

In addition to the program review, the inspector reviewed the following positions and persons assigned to those positions:

|  |              |
|--|--------------|
| Plant Supervisor-Electrical            | M. Craig     |
| Supervisor-Instrumentation and Control | C. Leppla    |
| Senior Plant HP Technician             | L. Large     |
| Asst. Plant Electrical Supervisor      | G. Regal     |
| Supervisor-Chemistry                   | R. Frechette |
| Supervisor-Reactor Engineering         | C. Pell      |
| Chemist                                | B. Kelsey    |
| Mechanic                               | C. McCoy     |
| Electrician                            | R. Lamb      |
| Instrument Control Technician          | B. Anderson  |

Within this area, no violations or deviations were identified.