



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

OCT 17 1984

Report Nos.: 50-335/84-28 and 50-389/84-30

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 NPF-16

Facility Name: St. Lucie

Inspection Conducted: September 24 - 27, 1984

Inspector: R. R. Marston
R. R. Marston

10/15/84
Date Signed

Accompanying Personnel: R. T. Hadley (PNL)

Approved by: W. E. Cline
W. E. Cline, Section Chief
Division of Radiation Safety and Safeguards

10/15/84
Date Signed

SUMMARY

Scope: This routine, unannounced inspection involved 58 inspector-hours on site in the areas of emergency preparedness.

Results: Of the areas inspected, no violations or deviations were identified.

REPORT DETAILS

1. Licensee Employees Contacted

- *C. M. Wethy, Plant Manager
- *H. E. Buchanan, Health Physics Supervisor
- *A. W. Bailey, QA Supervising Engineer
- W. J. Barrow, Site Fire Supervisor
- *J. J. Walls, QC Operations Engineer
- C. Burton, Nuclear Plant Supervisor
- J. J. Maisler, Acting Emergency Planning Coordinator
- G. A. Longhauser, Plant Security Coordinator - Nuclear

Other licensee employees contacted included two technicians.

NRC Resident Inspector

*H. E. Bibb

*Attend + exit interview

2. Exit Interview

The inspection scope and findings were summarized on September 27, 1984, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Emergency Detection and Classification (82201)

Pursuant to 10 CFR 50.47(b)(4) and 10 CFR 50, Appendix E, Paragraphs IV.B and IV.C, this program area was inspected to determine whether the licensee used and understood a standard emergency classification and action level scheme.

The inspector reviewed the licensee's classification procedures. The event classifications in the procedures were consistent with those required by regulations. The classification procedures did not appear to contain impediments or errors which could lead to incorrect or untimely classification.

Selected emergency action levels (EALs) specified in the classification procedures were reviewed. The reviewed EALs appeared to be consistent with the initiating events specified in Appendix 1 of NUREG-0654. The inspector noted that some of the EALs were based on parameters obtainable from Control Room instrumentation.

The inspector verified that the licensee's notification procedures included criteria (based on EALs) for initiation of offsite notifications and for development of protective action recommendations. The notification procedures required that offsite notifications be made promptly after declaration of an emergency.

The inspector discussed with licensee representatives the coordination of EALs with State and local officials. Licensee documentation showed that the licensee had discussed the EALs during the past year with State and local officials, and that these officials agreed with the EALs used by the licensee.

An interview was held with a Nuclear Plant Supervisor to verify that he understood the relationship between core status and core damage indicators and was able to effectively use those indicators. The interviewee appeared knowledgeable of the various core damage indications and their relationship to core status.

The inspector verified that responsibility and authority for classification of emergency events and initiation of emergency action were prescribed in licensee procedures and in the emergency plan.

Selected Emergency Operation Procedures (EOPs) were reviewed by the inspector and discussed with licensee personnel. The EOPs provided direction to users concerning timely classification of accidents. All personnel interviewed appeared to be familiar with the classification information in the EOPs.

No violations or deviations were identified in this program area.

6. Protective Action Decision-Making (82202)

Pursuant to 10 CFR 50.47(b)(9) and (10) and 10 CFR 50, Appendix E, Paragraph IV.D.3, this area was inspected to determine whether the licensee had 24-hour-per-day capability to assess and analyze emergency conditions and make recommendations to protect the public and onsite workers, and whether offsite officials had the authority and capability to initiate prompt protective action for the public.

The inspector discussed responsibility and authority for protective action decision-making with licensee representatives and reviewed pertinent portions of the licensee's emergency plan and procedures. The plan and procedures clearly assign responsibility and authority for accident assessment and protective action decision-making. Interviews with members of the licensee's emergency organization revealed that these personnel understood

their authorities and responsibilities with respect to accident assessment and protective action decision-making.

No violations or deviations were identified in this program area.

7. Notification and Communication (82203)

Pursuant to 10 CFR 50.47(b)(5) and (6) and 10 CFR 50, Appendix E, Paragraph IV.D., this area was inspected to determine whether the licensee was maintaining a capability for notifying and communicating (in the event of an emergency) among its own personnel, offsite supporting agencies and authorities, and the population within the EPZ.

The inspector reviewed the licensee's notification procedures. The procedures were consistent with the emergency classification and EAL scheme used by the licensee. The inspector determined that the procedures made provisions for message verification.

The inspector determined by review of applicable procedures and by discussion with licensee representatives that adequate procedural means existed for alerting, notifying, and activating emergency response personnel. The procedures specified when to notify and activate the onsite emergency organization, corporate support organization, and offsite agencies. Selected telephone numbers listed in the licensee's emergency directory were checked in order to determine whether the list and numbers were current and correct. At least 10 plant extensions were found to be incorrect. The Emergency Planning Coordinator informed the inspector they were aware of the problem and would be revising the directory. The content of initial emergency messages was reviewed and discussed with licensee representatives. The initial messages appeared to meet the guidance of NUREG-0654, Sections II.E.3 and II.E.4. Licensee representatives stated that the format and content of the initial emergency messages had been reviewed by State and local government authorities.

The licensee's management control program for the prompt notification system was reviewed. According to licensee documentation and discussions with licensee representatives, the system consisted of 58 fixed sirens. A review of licensee records verified that the system as installed was consistent with the description contained in the emergency plan. Maintenance of the system had been provided for by the licensee. The inspector reviewed test records for 1984 to the present. The records showed that tone and direction tests were conducted every two weeks, and growl tests conducted quarterly during maintenance. A full-cycle test is conducted annually by the counties.

Communications equipment in the Control Room, OSC, TSC, and EOF was inspected. Provisions existed for prompt communications among emergency response organizations, to emergency response personnel, and to the public. The installed communications systems at the emergency response facilities were consistent with system descriptions in the emergency plan and implementing procedures.

The inspector conducted operability checks on selected communications equipment in the Control Room, TSC, OSC, and EOF. No problems were observed. Licensee records of communication tests for the period October 1983 through September 1984 were reviewed. The inspector reviewed records which indicated that communications tests were conducted at the frequency specified in NUREG-0654, Section II.N.2.a. Licensee records also revealed that corrective action was taken on problems identified during communications tests.

Redundancy of offsite and onsite communication links was discussed with licensee representatives. The inspector verified that the licensee has established a backup communications system. The inspector requested and observed an unannounced communications check using the backup NAWAS telephone system. The inspector noted that the system operated properly. An unannounced notification check was performed. The Nuclear Plant Supervisor (who becomes the Emergency Coordinator) appointed a communicator from his staff, filled out the appropriate notification forms, and had the communicator relay the test message. The inspector determined that the notification was carried out correctly and according to procedure.

No violations or deviations were identified in this program area.

8. Changes to the Emergency Preparedness Program (82204)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR 50, Appendix E., Sections IV and V, this area was reviewed to determine whether changes were made to the program since the last routine inspection and to note how these changes affected the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector reviewed the licensee's procedure (OI 5-PR/PSL-1) governing review and approval of changes to the plan and procedures. The inspector verified that changes to the plan and procedures were reviewed and approved by management. It was also noted that all such changes were submitted to NRC within 30 days of the effective date, as required.

Discussions were held with licensee representatives concerning recent modifications to facilities, equipment, and instrumentation. By review of selected procedures, the inspector verified that procedural and plan changes were made to reflect the recent modifications to the OSC.

The organization and management of the emergency preparedness program were reviewed. The inspector verified that there had been no significant changes in the organization or assignment of responsibility for the plant and corporate emergency planning staffs since the last inspection. The inspector's discussion with licensee representatives also disclosed that there had been no significant changes in the organization and staffing of the offsite support agencies since the last inspection.

The inspector reviewed the licensee's program for distribution of changes to the emergency plan and procedures. Document control records for the REP change Revision 14 and the latest revisions to EPP 3100023E and 1212 showed that appropriate personnel and organizations were sent copies of plan and procedural changes, as required.

No violations or deviations were identified in this program area.

9. Shift Staffing and Augmentation (82205)

Pursuant to 10 CFR 50.47(b)(2) and 10 CFR 50, Appendix E., Paragraphs IV.A and IV.C, this area was inspected to determine whether shift staffing for emergencies was adequate both in numbers and in functional capability, and that administrative and physical means were available and maintained to augment the emergency organization in a timely manner.

Shift staffing levels and functional capabilities of all shifts were reviewed and found to be consistent with the guidance of Table B-1 of NUREG-0654. The licensee has established a duty officer system (Operations Duty Call Supervisor) so that essential off-shift personnel are available if needed. The call-in procedure appears to be effective in meeting Table B-1 goals.

The inspector discussed staff augmentation times with licensee representatives. Licensee representatives indicated that studies confirmed that Table B-1 augmentation times could be met.

No violations or deviations were identified in this program area.

10. Knowledge and Performance of Duties (Training)(82206)

Pursuant to 10 CFR 50.47(b)(15) and 10 CFR 50, Appendix E, Paragraph IV.F, this area was inspected to determine whether emergency response personnel understood their emergency response roles and could perform their assigned function.

The inspector reviewed the description (in the emergency plan) of the training program, training procedures, and selected lesson plans, and interviewed members of the instructional staff. Based on these reviews and interviews, the inspector determined that the licensee had established a formal emergency training program.

Records of training for key members of the emergency organization for the period October 1983 through September 1984 were reviewed. The training records revealed that personnel designated as alternates or given interim responsibilities in the emergency organization were provided with appropriate training. According to the training records, the type, amount, and frequency of training was consistent with approved procedures.

The inspector reviewed documentation which verified that drills and exercises were conducted at frequencies specified in the emergency plan, Section 7.1.4.

No violations or deviations were identified in this program area.

11. Licensee Audits (82210)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program.

Records of audits of the program were reviewed. The records showed that independent audits of the program were conducted by the onsite QA organization in August 1984 and by the corporate QA staff in January 1983. These audits fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated, and that findings concerning the interfaces were made available to State and local government authorities. Audit findings and recommendations were presented to plant and corporate management. A review of past audit reports indicated that the licensee complied with the five-year retention requirement for such reports.

The licensee's program for follow-up action on audits, drills, and exercise findings was reviewed. Licensee procedures required follow-up on deficient areas identified during audits, drills, and exercises. The inspector reviewed licensee records which indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a tracking system as a management tool in following up on actions taken in deficient areas.

Licensee emergency plans and procedures required critiques following exercises and drills. Licensee documentation showed that critiques were held following periodic drills as well as the annual exercise. The records showed that deficiencies were discussed in the critiques, and recommendations for corrective action were made.

No violations or deviations were identified in this program area.

12. Inspector Followup (92701)

(Closed) Inspection Followup Item (IFI) 83-04-07 Potential contamination problem at Lawnwood Medical Center due to water dripping from patient. A licensee representative stated that a special decontamination table was installed at the medical center and personnel were trained in its use.