

**From:** James Kreh, NRC:R2  
**To:** ATB Annie Boland, NRC:R2  
**Date:** 11/7/96 2:15pm  
**Subject:** ST. LUCIE VIOLATIONS

Here are the 2 violations that are the subjects of the EAW. Thought it might help you to get a preview of these.

KKK/11

## DRAFT NOTICE OF VIOLATION

St. Lucie Plant  
Inspection Report Nos. 50-335, 50-389/96-18

- A. 10 CFR 50.54(q) requires that nuclear power plant licensees follow and maintain in effect emergency plans which meet the planning standards of 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50. Section 2.4 of the licensee's Radiological Emergency Plan (REP), Revision 31, states that activation of the Technical Support Center (TSC) and the Operational Support Center (OSC) will be initiated by the Emergency Coordinator in the event of an Alert, Site Area Emergency, or General Emergency, and that arrangements have been made to staff the TSC and OSC in a timely manner. Also specified is that activation of the Emergency Operations Facility (EOF) is required for a Site Area Emergency or General Emergency, and that arrangements have been made to activate the EOF in a timely manner.

The REP requirements delineated above are implemented by procedure EPIP-3100023E, "On-Site Emergency Organization and Call Directory", Revision 72. The instruction in Section 8.2 of that procedure states that, upon the declaration of an emergency classification, "the Duty Call Supervisor will initiate staff augmentation" using the "Emergency Recall System or Appendix A, Duty Call Supervisor Call Directory to notify persons..."

Contrary to the above, from approximately July 22 to October 3, 1996, arrangements were not available to staff or activate the TSC, OSC, or EOF in a timely manner because the licensee did not have the capability to implement either the primary method (using the Emergency Recall System) or the backup method (using the Duty Call Supervisor Call Directory) for notifying its personnel to report to the plant during off-hours to staff and activate the TSC, OSC, and EOF.

This is a Severity Level IV violation (Supplement VIII).

- B. 10 CFR 50.54(q) requires that nuclear power plant licensees follow and maintain in effect emergency plans which meet the planning standards of 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50. REP Section 7.2.2, "Training of On-Site Emergency Response Organization Personnel", states, "The training program for members of the on-site emergency response organization will include practical drills as appropriate and participation in exercises, in which each individual demonstrates an ability to perform assigned emergency functions." The licensee's Plan further states, "For employees with specific assignments or authorities as members of emergency teams, initial training and annual retraining programs will be provided. Training must be current to be maintained on the site Emergency Team Roster."

Contrary to the above, the licensee failed to provide a program which included an opportunity for each individual assigned to the on-site emergency response organization to participate in a drill or exercise.

In 1994, the licensee failed to provide training for 17 positions (approximately 92 individuals) identified as part of the on-site response organization. In 1995, the licensee failed to provide training for 8 positions (approximately 54 individuals) identified as part of the on-site response organization. The licensee's training program failed to include initial or periodic retraining on certain procedures required to be implemented by several identified positions. In 1995, the licensee failed to remove from the emergency response organization 4 individuals who had not completed retraining as required. The licensee failed to remove 6 individuals from the emergency response organization effective October 6, 1996, who had not remained qualified to fill response team requirements as a result of allowing their respirator qualifications to lapse.

This is a Severity Level IV violation (Supplement VIII).