UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

FILE COPY

February 12, 1997

Exempted per 10 CFR 2.790(a)(6)(i)(C)

1C [redacted]

SUBJECT: ALLEGATION REPORT RII-97-A-0027

[redacted]

This is a follow-up to my letter to you dated February 7, 1997, regarding concerns expressed to the Nuclear Regulatory Commission (NRC) on January 30, 1997. Your concerns dealt with licensee's control of on-site hazardous materials, industrial safety concerns, and management at Florida Power and Light Company's St. Lucie facility.

A description of your concerns was provided to you in my previous letter to you in enclosure 1, Statement of Concerns. This is to inform you that we also intend to refer item D of the Statement of Concerns to the State of Florida for their review. For convenience, I have enclosed another copy of the Statement of Concerns.

Should you have further questions regarding this matter, please contact me at (404) 331-4194. Collect calls will be accepted. You can also contact me by calling 1-800-577-8510 or respond in writing. Our mailing address is P.O. Box 845, Atlanta, GA 30301.

Sincerely,

Algis J Ignatonis

Al Ignatonis,
Senior Allegations Coordinator
Enforcement and Investigation
Coordination Staff

Enclosure: As stated

Certified Mail Number: P 058 060 428
RETURN RECEIPT REQUESTED

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 7C
FOIA- 97-484

B110

9802180042 980123
PDR FOIA
BARTON97-484 PDR

FLORIDA POWER and LIGHT COMPANY

ST. LUCIE NUCLEAR PLANT, UNITS 1 and 2

STATEMENT OF CONCERNS

A. In 1995 the concerned individuals (CIs) were told to move approximately seventy five 55 gal drums of liquid out of the RCA to be processed for water and oil separation. The Mechanical Maintenance (MM) personnel reported that they were reluctant to take the drums out of the RCA because there was no evidence that the drums had been sampled and analyzed and free of hazardous materials. There were no markings or labels identifying the contents on the drums. The MM personnel were concerned that the drums contained hazardous materials that would be released to the environment. The Chemistry department took random samples of the drums contents and sampled the liquid for radioactive material but did not sample for other hazardous material such as anti-freeze.

B. The MM foreman notified the Plant Manager that he was concerned about the possible release of hazardous material to the environment. The CI reported that the Plant Manager verbally committed to having the liquid material removed from the RCA properly tested, labeled, and documented. The CI reported that correction of the sampling, analysis, and drum labeling activities never occurred.

C The CIs stated that numerous drums of liquid material being stored in the Dry Storage Facility that were still unlabeled. The CIs stated that a HP technician had told the CIs and an NRC inspector that no one knew the contents of the drums in the Dry Storage Facility.

D. The CIs reported that the water effluent from the oil and water separator had a blue color similar to the color of "Now Cool" a anti-freeze used in the diesel generators. The water was routed to a storm drain that flowed into the west pond located within the protected area.

E. Management has reassigned task to other work crews when a work crew raised concerns about a particular activity. Issue below is an example. Carbon Filters in the Water Treatment Plant have Material Safety Data Sheets requiring workers to wear supplied air respirators when handling filters. When the crew raised the concern to management, the task was assigned to another work crew and the new work crew wore dusk mask rather than supplied air respirators when handling the materials.

F. Spilled resin and scaffold ladders in the Blowdown Building have contributed to three personnel injuries, one resulting serious injury.

G. The CIs stated that a failure to properly operate the systems within the steam generator blow down building was a root cause for many of the issues observed.

H. Scaffolds constructed within the steam generator blowdown building are not properly assembled and are left standing too lor g.

FLORIDA POWER and LIGHT COMPANY

ST. LUCIE NUCLEAR PLANT, UNITS 1 and 2

STATEMENT OF CONCERNS

I. Management does not pay attention to details. Plant Work Orders (PWOs) issued by planning are pre-reviewed and do not get detail quality control reviews. An assessment of the PWO process was performed by QC and identified numerous issues with inadequate PWO planning.

J. Middle levels of management are unwilling to listen to recommendations and suggestions by the maintenance personnel who have experience with the work activity. Many of the personnel in middle management on swing shift and night shift do not have adequate backgrounds and experience in the areas they supervise. CIs believe certain manager is committed to correcting problems at St. Lucie but is hampered by middle managers that do not know or report the true conditions of plant activities. CIs suggest that a certain manager go directly to line personnel to find out were the problems are.

y 23, 1996

ALLEGER IDENTIFICATION SHEET

ALLEGER\ADDRESS: [redacted]	CHANGE OF ADDRESS
[redacted]	HOME PHONE: ( )
WORK PHONE: ( )	WORK PHONE: ( )
CASE NO: RII-96-A-0150	FACILITY: ST. LUCIE
OCCUPATION: [redacted]	EMPLOYER: Florida Power & Light [redacted]
DOL COMPLAINT: YES ( ) NO (✓) ERA NO:	OI INVESTIGATION: YES ( ) NO (✓) OI CASE NO:

ADDITIONAL INFORMATION/OTHER CONTACTS

Reference allegation RII-96-A-0145.

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C
FOIA- 97-484

Exempted per 10 CFR 2.790(a)(6)(7)

Ex 7C

B/11

CLOSED CASE CHRONOLOGY

RII-1996-A-0180

		DATE RECEIVED	DATE ASSIGNED	DATE DUE	DATE COMPLETE	DAYS TO COMPLETE
Concern	1	8/22/96	2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	1		10/31/96	10/31/96	10/31/96	0
Action		***ENNIS***	***ARB Meeting***			
Description		DRS/PSBbriefed on inspection results re: possible backdating of document. Document involved appeared to be 9/27/96 letter to State of Florida. OI (McNulty) to open case on basis of possible integrity issue involving licensee mgt. personnel.				
Concern	1		10/8/96		10/8/96	0
Action		***BARR***	***Followup ARB Meeting***			
Description		PURPOSE: To consider additional information relating to the EP inspection in progress at St. Lucie. EP insps to be sensitive to this issue during the inspection and be alert for any inconsistencies in the documentation/paper trail for documents				
Concern	1		10/3/96		10/3/96	0
Action		***DEMIRANDA***	***Status Letter***			
Description						
Concern	1		9/27/96		9/27/96	0
Action		***ENNIS***	***Acknowledgement Letter***			
Description						
Concern	1		9/13/96		9/13/96	0
Action		***BARR***	***Followup ARB Meeting***			
Description		REPANEL ADDITIONAL INFORMATION RCVD FROM ALGR. ITEM 15 ORIGINAL CONCERN. DRS/PSB INSPECT.				
Concern	1		8/29/96		8/29/96	0
Action		***BARR***	***Followup ARB Meeting***			
Description		DRS/PSB REVIEW REVISED EMERGENCY PLAN. EICS PREPARE ACKNOWLEDEMENT LETTER BY 9/20/96.				

...information in this record was deleted
...accordance with the Freedom of Information
...Act, exemptions 2C
FOIA- 97-484

B/13

RII-1996-A-0180

		DATE RECEIVED	DATE ASSIGNED	DATE DUE	DATE COMPLETE	DAYS TO COMPLETE
Concern	2	8/22/96	2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	3		2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	4		2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	5		2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	6		2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	7		2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	8		2/3/97		2/3/97	0
Action		***BARR***	***Status Letter***			
Description		CLOSURE LETTER FOR TECH ISSUE				

		DATE RECEIVED	DATE ASSIGNED	DATE DUE	DATE COMPLETE	DAYS TO COMPLETE
Concern	9	8/22/96	2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	10		2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	11		2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	12		2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	13		2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	14		2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				
Concern	15		2/3/97		2/3/97	0
Action		*BARR*	*Status Letter*			
Description		CLOSURE LETTER FOR TECH ISSUE				

		DATE RECEIVED	DATE ASSIGNED	DATE DUE	DATE COMPLETE	DAYS TO COMPLETE
Concern	16	8/22/96	5/29/97	5/30/97	5/30/97	1
Action		***DEMIRANDA***	***Review submittal***			
Description		SAC FINAL QA REVIEW OF CASE FILE				
Concern	16		4/21/97	6/2/97	5/29/97	38
Action		***LANDIS***	***Review OI Report***			
Description		IF NO NEW ISSUES, FORWARD THE OI SYNOPSIS TO THE LICENSEE AND THE ALLEGER FOR CASE CLOSURE AND OBTAIN EICS AND OI CONCURRENCE. IF NEW ISSUES IDENTIFIED, NOTIFY EICS FOR REVIEW AT ARB.				
Concern	16		5/29/97	5/29/97	5/29/97	0
Action		***LANDIS***	***Closure Letter***			
Description		OI SYNOPSIS TO THE LICENSEE AND THE ALLEGER. CASE CLOSED.				
Concern	16		2/12/97	3/12/97	2/28/97	16
Action		***DEMIRANDA***	***Other***			
Description		AWAITING OE MEMO				
Concern	16		11/6/96	2/28/97	2/12/97	98
Action		***MCNULTY***	***OI Investigation***			
Description		OI INVESTIGATION. CLOSED - NOT SUBSTANTIATED				
Concern	16		10/31/96		10/31/96	0
Action		***MCNULTY***	***Followup ARB Meeting***			
Description		DRS/PSB briefed on inspection results re: possible backdating of document. Document involved appeared to be 9/27/96 letter to State of Florida. OI (McNulty) to open case on basis of possible integrity issue involving licensee mgt. personnel.				

CASE CHRONOLOGY
RII-96-A-0180

FACILITY: ST. LUCIE | OPENED BY: ALLEGATIONS

DATE/INITIALS	ACTIVITY	SECTION
10/02/96;ODM	From: Joel Munday To: OXD Date: 10/2/96 1:43pm Subject: St. Lucie Allegation On October 2, 1996 at approximately 08[redacted] of the EP organization, [redacted] of the Compliance organization, and the alleger were in the Resident Inspectors office when I returned from the plant. [redacted] were requesting information on the upcoming EP inspection. I told them, in the presence of the alleger, that two individuals would arrive on site Monday October 7, 1996 to perform an inspection in the area of Emergency Preparedness. [redacted] asked if one of the individuals was Jim Kreh. I told him that was my understanding. He asked about the other inspector. I told him I understood that he was from HQ but wasn't certain. They asked no more questions and left. The alleger stayed and commented that it was ironic that he was in the Resident Inspectors office when Benken and Walker arrived questioning the upcoming inspection. He stated that he would probably give the allegation to the licensee either Thursday or Friday but that he would inform us beforehand. I told him that he did not need to inform us beforehand but if he didn't mind letting us know after he gave it to them we would appreciate it. He stated that he would. He then left the office.	7C
10/03/96;ODM	SAC LETTER TO ALGR - OUR UNDERSTANDING OF HIS IDENTITY PROTECTION. COPY FAXED TOT HE SITE FOR THE RESIDENTS TO HAND DELIVER TO THE ALGR. OVERNIGHT EXPRESS MAIL HARD COPY TO THE ALGR	5
10/04/96;ODM	From: Mark Miller To: BXU Date: 10/4/96 4:47am Subject: St. Lucie EP Allegations Recapping our discussion of 10/3, I provided a faxed copy of the letter stating that we intended to inspect the EP allegations openly to the alleger. I witnessed him reading the letter and ensured that he understood that his identity would be revealed through this approach. Additionally, I stressed to him that, should he develop any reservations about this approach before the inspection began, he should contact Oscar or myself immediately. He stated that he understood and that, at that time, he had no reservations. While discussing the issue, he mentioned some activities the EP group was performing to get ready for the inspection. That portion of the conversation resulted in the attached allegation.	
10/07/96;ODM	MARK MILLER CALLED SAC AND ADVISED THAT THE ALGR WALKED INTO THE RESIDENT'S OFFICE THIS MORNING AT ABOUT 8:00 AM AND STATED THAT HE HAD PROVIDED A COPY OF THE [redacted] REPORT TO THE LICENSEE. IN ADDITION, THE ALGR HANDED MILLER A COPY OF AN EMAIL TO A LARGE DISTRIBUTION THAT COMMUNICATED THAT THE ALGR HAD BEEN IN CONTACT WITH THE NRC. MILLER FAXED SAC A COPY WHICH WAS PROVIDED TO URYC. SAC REQUESTED THAT MILLER EMAIL ME A MESSAGE ON HIS CONTACT WITH THE ALGR.	1

September 10, 1996

ALLEGER IDENTIFICATION SHEET

ALLEGER\ADDRESS: 1C [redacted]	CHANGE OF ADDRESS
1C [redacted]	HOME PHONE: (___)_____ WORK PHONE: (___)_____
CASE NO: RII-96-A-0180	FACILITY: ST. LUCIE
1C [redacted]	EMPLOYER: Florida Power & Light
DOL COMPLAINT: YES ( ) NO (x) ERA NO:	OI INVESTIGATION: YES ( ) NO (x) OI CASE NO:

ADDITIONAL INFORMATION/OTHER CONTACTS

Exempt per 10 CFR 3.790(a)(6) & (7)

... with the Freedom of Information
Act, exemptions X
FOIA- 97-484

B/14

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303

May 29, 1997

Exempt from disclosure per 10 CFR 2.790(a)(6)(i)(C)

[redacted]

SUBJECT: ST LUCIE NUCLEAR PLANT: ALLEGED FALSIFICATION AND BACKDATING OF EMERGENCY PREPAREDNESS DOCUMENT (RII-96-A-0180) (OFFICE OF INVESTIGATIONS CASE NUMBER 2-96-042)

[redacted]

This refers to information you provided regarding possible falsification and backdating of an emergency preparedness document at the St Lucie Nuclear Plant.

Our Office of Investigations (OI) has completed their investigation into this matter and their findings are documented in the enclosure to this letter. OI was unable to substantiate the allegation of falsification and backdating.

If you have any questions regarding this matter, you can contact me at 1-800-577-8510 or 404-562-4530 or by mail at P.O. Box 845, Atlanta Ga., 30301.

Sincerely,

Kerry D. Landis

Kerry D. Landis, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Enclosure: Investigative Synopsis,
OI Case No. 2-96-042

Certified Mail No. P 785 728 157
RETURN RECEIPT REQUESTED

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 2
FOIA- 97-424

3/15

9706100281 1p

May 29, 1997

[redacted]

SUBJECT: ST LUCIE NUCLEAR PLANT: ALLEGED FALSIFICATION AND BACKDATING OF EMERGENCY PREPAREDNESS DOCUMENT (RII-96-A-0180) (OFFICE OF INVESTIGATIONS CASE NUMBER 2-96-042)

[redacted]

This refers to information you provided regarding possible falsification and backdating of an emergency preparedness document at the St Lucie Nuclear Plant.

Our Office of Investigations (OI) has completed their investigation into this matter and their findings are documented in the enclosure to this letter. OI was unable to substantiate the allegation of falsification and backdating.

If you have any questions regarding this matter, you can contact me at 1-800-577-8510 or 404-562-4530 or by mail at P.O. Box 845, Atlanta Ga., 30301.

Sincerely,

Orig signed by Kerry D. Landis

Kerry D. Landis, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Enclosure: Investigative Synopsis,
OI Case No. 2-96-042

Certified Mail No. P 785 728 157
RETURN RECEIPT REQUESTED

	EICS								
SIGNATURE									
NAME	ODeMiranda	WMcNulty							
DATE	05/29/97	05/28/97	05/ /97	05/ /97	05/ /97	05/ /97	05/ /97	05/ /97	
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES	YES	

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C
FOIA- 97-481

B1/6

9706100281 PD

May 20, 1996

INDEX OF CONCERNS

ST. LUCIE

RII-95-A-0186

NO.	DESCRIPTION	LOCATION
1/5	The ALGR said that his main concern is that work is being done without procedures or inadequate procedures	Date:11/27/95EI CS ALLEG RPT
ACTION: 12/07/96 ARB - DRP REVIEW CONCERN #1 AND PROVIDE INPUT TO DRS, DRS REVIEW CONCERNS #2 & #3 #4. DRP REVIEW CONCERN #5 REGARDING HOUSEKEEPING.		
CLOSURE: This concern is true; however, it is not an allegation as this concern was known to the NRC; as this concern had been identified through issuance of many violations involving a failure to follow procedures (see Enclosure 2) prior to receiving this concern.		
2/5	The ALGR said that recently he became aware of Hazardous Waste Drums being removed to the secondary side that have no tags, labels or HP procedures	Date:11/27/95EI CS ALLEG RPT
ACTION: 12/07/96 ARB - DRP REVIEW CONCERN #1 AND PROVIDE INPUT TO DRS, DRS REVIEW CONCERNS #2 & #3 #4. DRP REVIEW CONCERN #5 REGARDING HOUSEKEEPING.		
CLOSURE: Based on interviews with licensee staff, record reviews, and observations made during tours of licensee facilities; the inspector found no concerns with the removal of drums from the primary to secondary side of the facility and no uncontrolled containers of radioactive material or contamination. The inspector found evidence that the pond sediment and not the pond water had measurable contamination. Concerns (2) and (3) are not substantiated.		
3/5	The ALGR said that there are ponds on the secondary side that have radiation signs posted and are fenced to prevent people from entering but does not prevent wildlife from feeding in the ponds	Date:11/27/95EI CS ALLEG RPT
ACTION: 12/07/96 ARB - DRP REVIEW CONCERN #1 AND PROVIDE INPUT TO DRS, DRS REVIEW CONCERNS #2 & #3 #4. DRP REVIEW CONCERN #5 REGARDING HOUSEKEEPING.		
CLOSURE: Based on interviews with licensee staff, record reviews, and observations made during tours of licensee facilities; the inspector found no concerns with the removal of drums from the primary to secondary side of the facility and no uncontrolled containers of radioactive material or contamination. The inspector found evidence that the pond sediment and not the pond water had measurable contamination. Concerns (2) and (3) are not substantiated.		
4/5	"People are getting fired who Speakout	Date:11/27/95EI CS ALLEG RPT

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C
FOIA-97-489

B/17

INDEX OF CONCERNS

ST. LUCIE

RII-95-A-0186

NO.	DESCRIPTION	LOCATION
	ACTION: 12/07/96 ARB - DRP REVIEW CONCERN #1 AND PROVIDE INPUT TO DRS, DRS REVIEW CONCERNS #2 & #3 #4. DRP REVIEW CONCERN #5 REGARDING HOUSEKEEPING.	
	CLOSURE: The results of the Speakout inspection could not substantiate that people who speakout are fired. Consequently this concern could not be substantiated.	
5/5	GREEN DEFICIENCY TAGS OVER ONE YEAR OLD ON EQUIPMENT & 480 VOLT PANELS RUSTED OUT.	Date:11/27/95EI CS ALLEG RPT
	ACTION: 12/07/96 ARB - DRP REVIEW CONCERN #1 AND PROVIDE INPUT TO DRS, DRS REVIEW CONCERNS #2 & #3 #4. DRP REVIEW CONCERN #5 REGARDING HOUSEKEEPING.	
	CLOSURE: The concern regarding old deficiency tags is not an allegation as it has been known by NRC at least since August of 1995. Regarding the concern about 480 volt panels being rusted out, the Residents have observed no rust related concerns with safety related panels.	
6/		Date:__/__/__Page:____ para:____
	ACTION:	
	CLOSURE:	
7/		Date:__/__/__Page:____ para:____
	ACTION:	
	CLOSURE:	
8/		Date:__/__/__Page:____ para:____
	ACTION:	
	CLOSURE:	
9/		Date:__/__/__Page:____ para:____
	ACTION:	
	CLOSURE:	

ALLEGATION REPORT

CASE NO: RII-95-A-0186	FACILITY: ST LUCIE
CONCERN NOS: (1, 2, 3 & 4)	DOCKET NO: 50-335, 389
ALLEGER: ANONYMOUS [redacted] ADDRESS: HOME PHONE: ( ) WORK PHONE: ( )	EMPLOYER: FP&L TITLE [redacted] DATE RECEIVED: 11/27/95 (0940-1038)

Exempted per 10 CFR 2.790(a)(6)(1)

SAC received a phone call from an anonymous alleger who expressed various concerns related to maintenance practices at the St. Lucie Nuclear Plant. The ALGR said that he was [redacted] and had worked at Turkey Point for [redacted] and at St. Lucie for [redacted]. The ALGR stated that the condition of St. Lucie is as it used to be at Turkey Point in the late 1980s.

(1) The ALGR said that his main concern is that work is being done without procedures or inadequate procedures. The ALGR said that "the attitude is they need it right now - do it - they'll get the paperwork later." The ALGR said that it would be easy to verify if we checked work being done in process and asked for the procedure. The ALGR said that if we checked at night we would probably find it easier to prove. SAC asked the ALGR if he could provide an example. The ALGR said that [redacted] from Turkey Point was sent up to St. Lucie in mid November to [redacted] procedures. The ALGR said that he heard [redacted] complain [redacted] According to the ALGR, it took 19 hours to get approval to change a nut on a valve cover.

Ex 7C

(2) The ALGR said that recently he became aware of Hazardous Waste Drums being removed to the secondary side that have no tags, labels or HP procedures. The ALGR said that a verbal order was given to a crew to remove the drums from the hot side to the secondary side and dump the contents in the oily waste separator. The ALGR said that this went on for three days. The ALGR said that to date, chemistry does not have a procedure for removal of hazardous drums. The ALGR said that all chemistry has are guidelines to perform spot checks which the ALGR believes is inadequate.

Alleger informed of NRC identity protection policy?... Y ✓ N
Did alleger request confidentiality ?..... Y N ✓
Did the alleger object to a licensee/state referral?... Y N ✓
Was the alleger informed of DOL reporting requirements? Y ✓ N

Type of Regulated Activity: (a) ✓ Reactor b) Vendor (c) Materials (d) Safeguards (e) other:

Functional Area(s): (a) Operations (b) Construction (c) Safeguards (d) Transportation (e) Emergency Preparedness (f) Onsite Health & Safety (g) Offsite Health & Safety (e) ✓ other: MAINTENANCE

Ask all above questions, do not leave any blanks. Complete one sheet for each issue. Forward this form to: RII/RAC, P.O. BOX 845 Atlanta, GA 30301. Do not retain any file copies subsequent to receipt by RAC.
RAC phone numbers are (404) 331-4193 & 331-4194.

PREPARED BY: OSCAR DEMIRANDA	DATE PREPARED: 11/27/95

ALLEGATION REPORT

CONTINUATION SHEET

CASE NO: RII-95-A-0186	FACILITY: ST. LUCIE

ADDITIONAL INFORMATION

(3) The ALGR said that there are ponds on the secondary side that have radiation signs posted and are fenced to prevent people from entering but does not prevent wildlife from feeding in the ponds. The ALGR said, "what about the birds, raccoons and ducks eating there?" The ALGR said that wild life and protected species should not be exposed to contamination.

(4) SAC asked the ALGR is he had reported any of his concerns to management or to Speakout and the ALGR replied, "you must think I'm crazy." "People are getting fired who Speakout." The ALGR said that if we were to talk to the bargaining unit employees, they would tell us about Speakout. The ALGR said that when the NRC talks to workers about Speakout, management knows who they are because of the lists of individuals the NRC asks to talk to. The ALGR said that the NRC needs to find a way to interview the workers without management knowing who was interviewed.

ADDITIONAL COMMENTS

The ALGR said that the plant is a mess. SAC asked him to explain. The ALGR said that there are green deficiency tags over one year old on equipment. The ALGR said that there are 480 volt panels rusted out.

ACTION REQUIRED

PREPARED BY: OSCAR DEMIRANDA	DATE PREPARED: 11/27/95

May 4, 1996

ALLEGER IDENTIFICATION SHEET

ALLEGER/ADDRESS:	CHANGE OF ADDRESS –
[redacted]	
[redacted]	HOME PHONE: (__)
	WORK PHONE: (__)
CASE NO: RII-95-A-0199	FACILITY: ST LUCIE
OCCUPATION: [redacted]	EMPLOYER: FP&L
DOL COMPLAINT: YES ( ) NO (✓) ERA NO: ****	OI INVESTIGATION: YES ( ) NO (✓) OI CASE NO:

ADDITIONAL INFORMATION/OTHER CONTACTS

****: REFERENCE RII-95-A-0026 FOR DOL INFORMATION

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C
FOIA- 97-484

D/18

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

May 1, 1996

Exempted per 10 CFR 2.790(a)(6)(i)(C)

[redacted]

SUBJECT: RII-95-A-0199 - QUESTIONABLE INSTRUMENTATION & CONTROL PRACTICES

[redacted]

This refers to our letter dated February 12, 1996, in which you were advised that we were continuing our review of the concerns you expressed related to the versatile 200 florescent digital display indicators at the St Lucie Nuclear Plant.

Our review regarding this matter has been completed, and our findings are documented in the enclosures to this letter. Based on the information provided, we were able to substantiate the concerns.

This concludes the staff's activities regarding this matter. If you have any questions, you may contact me at 1-800 577-8510 or (404) 331-5509 or by mail at P.O. Box 845, Atlanta, GA 30301.

Sincerely,

Kerry D. Landis

Kerry D. Landis, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Enclosures: 1. Allegation Evaluation Report
2. Inspection Report Nos.
50-335/96-01 and 50-389/96-01
3. Inspection Report Nos.
50-335/95-15 and 50-389/95-15

Certified Mail No. Z 238 513 628
RETURN RECEIPT REQUESTED

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in accordance with the Freedom of Information
Act, exemptions 7C
FOIA- 97-484

9705290071 3pp

B/19

ALLEGATION EVALUATION REPORT
ALLEGATION NUMBER RII-95-A-0199
CONTROL ROOM VERSATILE INDICATOR DISPLAY FAILURES
ST. LUCIE NUCLEAR PLANT UNITS 1 AND 2
DOCKET NUMBERS 50-335 AND 50-389

ALLEGATION:

There are operability concerns with the Control Room Versatile-2000 indicators which could lead to improper reading of the system indications.

DISCUSSION:

The Versatile-2000 indicators provide Control Room indication for various safety related systems parameters. The indicator provides a visual fluorescent bar graph display of the monitored parameter as well as a digital display. The digital display is intentionally blocked on some indicators due to human factors related to horizontally mounted indicators and logarithmic scale applications. Failed indicators were described as bar graph lit displays in which ten to 15 percent of the upper or lower range did not light to indicate the parameter in this range. Dimmed indicators were described as a reduced light intensity display through the entire range of the bar graph. The potential plant operability concern was that a failed indicator could result in improper perception by an operator of system conditions.

Indicator failure was initially identified in the simulator and documented on St. Lucie Action Report (STAR) 951509 in February, 1995. The failed indicators were discarded. The STAR was assigned to Engineering in April, 1995, and a control room walkdown at that time identified no failed indicators. Two dimmed indicators from the simulator were sent to the supplier in May, 1996 for analysis. The supplier concluded there was no deficiency with the dimmed indicators. No correlation was established between dimmed and failed indicators. A failed indicator was identified during a Unit 2 instrument loop check in October, 1995. Display testing was conducted on all plant Versatile-2000 indicators in December, 1995. Of the 279 Unit 2 indicators, 66 were dimmed and 44 failed; of the 134 Unit 1 indicators, 105 were dimmed and 5 failed.

The licensee's interim corrective actions resolved the potential plant operability concerns and were completed prior to Unit 2 restart. All failed display units were replaced. Failed display units were returned to the supplier for failure analysis. The dimmed displays were evaluated with the Operations staff for acceptability. The development of long term corrective actions was pending completion of the supplier cause analysis and would include routine display testing or replacement of susceptible indicator displays. The display failure did not impact the safety related alarm or control functions of the instrument.

You also highlighted a concern identified by the Resident inspector at the exit meeting regarding inadvertent hydrogen over-pressurization of the Unit 2 main generator. The inspection of this issue, including the operational use of the turbine generator hydrogen panel was documented as a weakness in Inspection Report Nos. 50-335/95-15 and 50-389/95-15, paragraph 3.b.11). No generator damage occurred and no regulatory requirements were violated.

CONCLUSION:

The allegation was substantiated in that there was an instrument operability problem with the Versatile-2000 indicators; however, there was not a plant operability concern as a result of the indicator display failure mechanism.

The licensee's interim corrective actions were adequate to assure no plant operability concern as a result of the potential indicator display failures. The identification of the failed indicator display during an instrument loop check indicated that the failure mechanism could be age related since previous loop checks identified no failures. Review of the licensee's in-house event reports and STARs indicated that no plant transients or events occurred due to failed Versatile-2000 displays. The licensee was adequately monitoring instrument performance and proceeding with long term corrective actions.

The operational use of the turbine generator hydrogen panel was documented as a weakness, however, no regulatory requirements were violated.

This allegation is considered closed.

August 17, 1996

exemption 7E

INDEX OF CONCERNS

ST. LUCIE UNIT 2

RII: 96-A-0029

NO.	DESCRIPTION	LOCATION
1/	EXPLOSION DAMPER SETTINGS MAY BE OUT OF SPECIFICATION. THE DAMPERS ARE LOCATED NEAR THE BOTTOM OF UNIT 2 REACTOR VESSEL. DAMPER SPRING TENSION WAS CHECKED DURING UNIT 2 REFUELING OUTAGE APPROXIMATELY THREE YEARS AGO. ALLEGER BELIEVES THAT EVEN THOUGH [redacted] FOUND THE DAMPERS TO BE IN SPEC, [redacted] LEFT THE JOB WITH DAMPERS OUT OF SPECIFICATION.	Letter to NRC dated 2/21/96 Page: 1 of 1

ACTION: 2/29/96 ARB - EICS CONTACT ALGR FOR MORE INFO

CLOSURE: The inspectors concluded that the concern was substantiated. The review of the pressure relief damper surveillance and maintenance practices are documented in NRC Inspection Report 50-335,389/96-09. Two violations were identified: (1) Failure to Test the Reactor Cavity Pressure Relief Dampers In Accordance With The Vendor's Technical Manual and (2) Failure To Perform Adequate Testing On The Reactor Cavity Pressure Relief Dampers. Notwithstanding the low safety significance (given the results of the SER) of the blast damper deficiencies identified by the inspectors, the fact that the licensee had treated them as safety-related indicated a poor application of QA plan requirements to the maintenance and testing of the components. Consequently, the violations identified above remain cited, as they indicate a programmatic weakness with regard to the testing of (designated) safety-related components.

The maintenance and tests performed on these dampers during the recent 1996 refueling outage indicated that the dampers were operable. This allegation is considered closed.

2/		Date: Page: Para: Item:

ACTION:

CLOSURE:

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C
FOIA- 97-484

B/20

2-21-96

Exemption 7C

Dear Mr. DeMiranda:

I would like to report an incident that occurred at St. Lucie's unit 2 approximately three years ago during a refueling outage.

[redacted] to review the appropriate procedures and set up and begin the process of verifying the setting of the explosion dampers located near the bottom of the reactor. These dampers consist of two separate panels of dampers held closed by spring tension. A scale, pulley, winch assembly is installed and the t[redacted] is compared to the procedures acceptance criteria. There are two positions from which [redacted] rig can be installed and some confusion surfaced early on as to the correct positioning. After this was resolved [redacted] began the task of performing the inspection. 7C

[redacted] virtually all of the dampers in both panels to be out of specification and began the lengthy process of adjusting these dampers.

At this point it became obvious to management that this job was going to be taking considerable time and [redacted] was brought into the picture with there own foreman. 7C

[redacted] work this job non-stop in two hour shifts. After giving [redacted] a turnover [redacted] left the job, having only corrected one or two dampers on one panel.

Before the next two hours expired [redacted] reported to the work assignment area and informed [redacted] the job was finished and all tooling was removed from the area. They reported [redacted] have made an error in checking the dampers and that they were all in spec [redacted] that we had made our inspections in each possible way but their reply was we must have been mistaken. 7C

I fully believe that this job was left with the dampers out of specification.

[redacted]

Exempted per 10 CFR 2.790(a)(6)(i)(7)

7C

DATE RECEIVED

FEB 26 1996

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W., SUITE 2900
ATLANTA, GEORGIA 30323-0199

August 5, 1996

[redacted]

SUBJECT: RII-96-A-0029 - PRESSURE RELIEF DAMPERS IMPROPERLY SET

[redacted]

Exemption 6 (7)(C)

This refers to our letter dated February 26, 1996 in which we advised you that we were continuing our review of the concern you expressed regarding damper settings being left in an out-of-specification condition inside the reactor building at Florida Power and Light Company's St. Lucie Unit 2 nuclear power plant.

Our inspection regarding this matter has been completed and our findings are documented in the enclosure to this letter. Based on the information provided, we were able to substantiate the allegation. Violations of regulatory requirements were identified and are reported in the enclosed NRC Inspection Report 50-335,389/96-09.

This concludes the staff's activities regarding this matter. If you have any questions, you may contact me at 1-800-577-8510 or (404) 331-5509 or by mail at P.O. Box 845, Atlanta, GA 30301.

Sincerely,

Kerry D. Landis

Kerry D. Landis, Chief, Branch 3
Division of Reactor Projects

Certified Mail No. P 485 920 156
RETURN RECEIPT REQUESTED

Enclosures: 1. Allegation Evaluation Report
2. Report Nos. 50-335, 389/96-09

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C
FOIA- 97-414

9705210184

B/21

ALLEGATION EVALUATION REPORT

ALLEGATION NUMBER RII-96-A-0029

PRESSURE RELIEF DAMPERS IMPROPERLY SET

ST. LUCIE UNIT 2 NUCLEAR PLANT

DOCKET 50-389

Exemption 7

CONCERN:

The concerned individual provided a concern related to the pressure relief damper spring tension that was checked during a refueling outage at St. Lucie, Unit 2 about 3 years ago. The concerned individual stated that [redacted] found virtually all dampers in both panels to be out of specification. Another crew with another foreman was called in to assist in completing the job, and the other crew reported that the first crew must have made an error in checking the dampers and that they were all within specifications.

The concerned individual believes that the job left with the dampers out of specification.

DISCUSSION:

The reactor pressure relief dampers were described by Unit 1 FSAR Section 6.2.1.3.3 and by Unit 2 FSAR Section 6.2.1.2.3. These dampers are closed during normal plant operations to aid in maintaining proper reactor cavity ventilation. During a LOCA event, these dampers are designed to open and provide pressure relief through two electrical tunnels to maintain the pressure rise in the reactor cavity below the design safety limits.

The inspector reviewed the previous maintenance and tests performed on these pressure relief dampers. The vendor recommended that maintenance and testing of the Unit 1 dampers be performed annually and once each 18 months for the Unit 2 dampers. The maintenance and testing of the Unit 1 dampers were on a 54 month frequency and the Unit 2 dampers were on an 18 month frequency. The licensee did not have an evaluation to justify deviating from the vendor's recommended maintenance and test frequency for the Unit 1 dampers. Procedure QI 5-PR/PSL-1, Rev 71, "Preparation, Revision, Review/Approval of Procedures," Section 5.11, stated that maintenance and preventative maintenance requirements specified in vendor technical manuals shall be considered when writing maintenance procedures. Deviations from these recommendations must be justified by a technical review performed by the respective maintenance engineering group. The failure to provide a technical review justifying changes to the maintenance and testing of the Unit 1 pressure relief dampers from annually to once per 54 months is identified as an example of Violation 50-335,389/96-09-03, "Failure to Test the Reactor Cavity Pressure Relief Dampers In Accordance With The Vendor's Technical Manual."

The work orders for the maintenance and testing of these dampers referenced the vendor technical manuals as the document providing the method for testing the dampers and the minimum acceptance requirements. The vendor manual for the Unit 2 dampers identified torque value set points for each pressure relief damper blade. During a review of the vendor's manual stored in the maintenance planning library, the inspector noted an internal memorandum in the manual for the Unit 2 dampers which contained alternate acceptance criteria for the torque values required for the damper blades. This engineering memorandum changed the vendor's recommended set points of the damper blades from plus or minus 5 lbs. to plus or minus 30 lbs. for blades Nos. 1 through 6 and plus or minus 26.5 lbs. for blade No. 7. There were no records to indicate that this change to the vendor document had received the required safety review prior to implementation. These revised values had apparently been in use for Unit 2 since November 13, 1987. The vendor manual in the document control vault did not contain this change. Therefore, the inspectors concluded that these changes had not been reviewed and approved as required by Procedure QI 5-PR/PSL-1, Section 5.11.5. This procedure stated that preventative maintenance requirements specified in technical manuals shall be considered when writing maintenance procedures and that the vendor recommendations for preventative maintenance activities or frequencies contained in the vendor technical manuals may be deviated from, provided a technical review is performed by the respective maintenance engineering group. The use of technical reference data which had not received a technical review and approval is identified as another example of Violation 50-335,389/96-09-03, "Failure to Test the Reactor Cavity Pressure Relief Dampers In Accordance With The Vendor's Technical Manual."

The records for the maintenance and testing performed by the WOs identified the torque values measured for each damper during the maintenance and measured test activities, except for WO 9502884301. This WO was for the Unit 1 dampers and did not list the measured torque values. The maintenance craft records only indicated that the dampers met the vendor's requirements. Discussions with mechanical maintenance personnel indicated that this information was obtained but the data was left in the Unit 1 reactor building. The licensee obtained a statement from the maintenance craft which indicated that the work was accomplished.

The inspector noted that WO 9502884301 used the vendor's technical manual as a reference document which did not require review by the Facility Review Group (FRG) and approval by the Plant General Manager. However, the work order did not contain sufficient detail instructions to perform the required maintenance, lubrication and testing required for the dampers. For example, the work order did not provide a description of the test procedure and did not provided the acceptable test values, (e.g. torque required on each damper blade). The work order stated that the referenced vendor manual was not required to be present at the job site.

The inspector concluded that the vendor manuals were in fact required to be at the job site in order to perform the required maintenance and test on these dampers. The work order did not provide sufficiently detailed information to perform the maintenance or to conduct the required test activity. Procedure QI 5-PR/PSL-1, Section 5.11.2, stipulated that vendor manuals could be used to supplement an invoked plant approved procedure/guideline or work scope/ instructions without FRG review and Plant General Manager approval. However,

to meet this requirement, the work order must provide sufficient information to accomplish the task. For this work order, the information in the vendor's technical manual was required to perform the maintenance and test. This item is identified as another example of Violation 50-335, 389/96-09-03, "Failure to Test the Reactor Cavity Pressure Relief Dampers In Accordance With The Vendor's Technical Manual."

Maintenance inspection, testing and lubrication data for the Unit 1 reactor cavity pressure relief dampers from 1987 and from 1990 for Unit 2 were evaluated. The inspector noted a number of significant deficiencies. These included:

- Unit 1 dampers worked by WO 91102918301, completed December 7, 1991, did not provide the proper torque values for the dampers. The work order indicated that the torque adjustments for 4 of the 7 damper blades to reactor cavity damper 1 were left out of tolerance and the torque values for 3 of the 7 damper blades to reactor cavity damper 2 were left out of tolerance.

- Unit 2 dampers worked by WO XA900621191827, completed October 24, 1990, did not provide the proper torque values for dampers. The torque adjustments for 4 of 7 of the damper blades for damper 1 were out of tolerance and the tolerance for 5 of the 7 damper blades for damper 2 were found out of tolerance using the vendor technical information. However, it appears that unapproved alternate acceptance criteria may have been used. As discussed above, the use of this unapproved data is identified as a violation.

- Unit 2 dampers worked by WO 9200226001, completed May 21, 1992, did not provide the proper torque values for reactor cavity damper 2. The torque adjustments for all 7 of the damper blades were found out of tolerance. The work data did not clearly indicate that these dampers were properly readjusted. No retests results were provided in the work package. Damper 1 was found satisfactory, adjusted and retested.

- Unit 2 dampers worked by WO 9300990701 only tested one of the two dampers. Damper 2 was not tested. The test for damper 1 did not use the acceptance criteria of the vendor technical manual but used alternate values. This issue is discussed above and is identified as a violation. The licensee reviewed this issue and confirmed that only one of the two dampers had been tested.

Based on these finding, the licensee issued Condition Report 96-1524 to address these items. These discrepancies are considered a failure to conform to the test requirements of 10 CFR 50 Appendix B Criterion XI, Test Control, and are identified as Violation 50-335,389/96-09-04, "Failure To Perform Adequate Testing On The Reactor Cavity Pressure Relief Dampers."

During this review, the inspector noted that the licensee had received information from the vendor which indicated that a some of the pressure retention springs for the Unit 1 dampers should be replaced. These springs had been procured and the inspector verified that the installation had been

scheduled for the 1997 Unit 1 refueling outage. The maintenance and tests performed on these dampers during the current 1996 refueling outage indicated that the dampers were operable; therefore, the proposed modification schedule was satisfactory.

As regards safety significance, the licensee presented information that indicated that the blast dampers' classification as safety-related was conservative. An NRC Safety Evaluation Report, dated March 5, 1993, concluded that dynamic effects associated with postulated pipe breaks in the RCS could be excluded from the design and licensing bases for St. Lucie. That determination was based upon the licensee demonstrating that they were bounded by the Combustion Engineering Owner's Group's leak-before-break analysis and that leakage detection systems for the RCS were capable of identifying sufficiently low leak rates (allowing time for operator action before leaks manifested themselves as larger breaks). Consequently, the blast dampers, which had been designed to accommodate dynamic effects, were not necessary in a safety-related context.

CONCLUSION:

The inspectors concluded that the concern was substantiated. The review of the pressure relief damper surveillance and maintenance practices are documented in NRC Inspection Report 50-335,389/96-09. Two violations were identified: (1) Failure to Test the Reactor Cavity Pressure Relief Dampers In Accordance With The Vendor's Technical Manual and (2) Failure To Perform Adequate Testing On The Reactor Cavity Pressure Relief Dampers. Notwithstanding the low safety significance (given the results of the SER) of the blast damper deficiencies identified by the inspectors, the fact that the licensee had treated them as safety-related indicated a poor application of QA plan requirements to the maintenance and testing of the components. Consequently, the violations identified above remain cited, as they indicate a programmatic weakness with regard to the testing of (designated) safety-related components.

The maintenance and tests performed on these dampers during the recent 1996 refueling outage indicated that the dampers were operable. This allegation is considered closed.

August 17, 1996

ALLEGER IDENTIFICATION SHEET

ALLEGER/ADDRESS: Exempted per 10 CFR (a)(6) & (7) [redacted]	CHANGE OF ADDRESS
[redacted]	HOME PHONE: ( )
WORK PHONE: ( )	WORK PHONE: ( )
CASE NO: RII-96-A-0029	FACILITY: ST. LUCIE, UNIT 2
OCCUPATION: [redacted]	EMPLOYER: ?
DOL COMPLAINT: YES ( ) NO (x) ERA NO:	OI INVESTIGATION: YES ( ) NO (✓) OI CASE NO:

ADDITIONAL INFORMATION/OTHER CONTACTS

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 2C
FOIA- 97-484

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