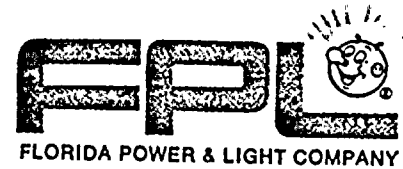


USNRC REGION II  
ATLANTA, GEORGIA



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July 28, 1980

L-80-244

Mr. James P. O'Reilly, Director, Region II  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, Suite 3100  
Atlanta, Georgia 30303

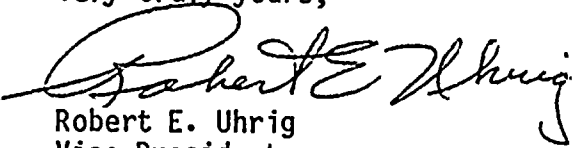
Dear Mr. O'Reilly:

Re: RII:WHM  
50-250/80-19  
50-251/80-20

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,

  
Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/MAS/cph

Attachment

cc: Harold F. Reis, Esquire

8009120520

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PEOPLE...SERVING PEOPLE



## ATTACHMENT

Re: RII:WHM  
50-250/80-19  
50-251/80-20

### FINDING

As required by Section 6.4.2 of the Technical Specifications, a fire brigade training program which meets or exceeds the requirements of National Fire Protection Association Manual No. 27 (NFPA), Private Fire Brigades, is required to be maintained except training sessions are required to be conducted quarterly. Sections 41 and 42 of NFPA-27 requires a schedule of training to be established and to be adopted to the needs of the brigade and to include actual fire fighting operations. Section 51 of NFPA-27 requires practice drills to be conducted to check the ability of the brigade members to perform the operations that they are expected to carry out.

Contrary to the above, records available do not indicate that all members of the brigade, primarily members from operations, routinely attend the quarterly fire brigade training drills, participate in actual fire fighting practice sessions, participate in quarterly scheduled classroom training sessions, and, that fire brigade team leaders are given advanced training in fire protection and fire fighting.

### RESPONSE

As corrective action, we will review and revise as necessary our procedures related to fire training to ensure that they clearly delineate the records which are required to be generated and retained to adequately document compliance with the requirements of Technical Specification 6.4.2. These procedures will be reviewed by September 15, 1980, and any necessary revisions to them will be reviewed by the Plant Nuclear Safety Committee and approved by the Plant Manager by October 15, 1980. In order to prevent recurrence of this finding, Quality Control inspectors will perform surveillances of the records generated in compliance with the revised procedures and Quality Assurance auditors will audit the records generated. Full compliance will be achieved by October 15, 1980.



## FINDING

Florida Power & Light (FP&L) Company's letter L-78-197 from R. E. Uhrig to A. Schwencer, NRC, dated June 5, 1978 states in part that the NRC guidelines entitled "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance" dated June 14, 1977, would be adhered to except as noted within Enclosure 1 to the June 5, 1978 letter.

Contrary to the above, the fire protection administrative control procedures do not meet the following NRC guidelines and no exception to these guidelines were identified in FP&L's letter of June 5, 1978:

1. Onsite plant procedures do not designate the onsite position responsible for the review and evaluation of proposed work activities to identify potential transient fire loads as required by Paragraph 1.d.(4) of Attachment 1 to NRC guidelines.
2. Existing procedures do not require a program to indoctrinate all plant contractor personnel in appropriate fire protection administrative procedures and emergency fire protection procedures as required by Paragraph 1.d.(5) of Attachment 1 to NRC guidelines.
3. Procedures do not address the review of transient fire loads resulting during maintenance and modification work activities and the need for additional fire protection equipment to be provided in the work area as required by Paragraph b of Attachment 3 to the NRC guidelines.
4. Procedures are not provided for the control of open flame and other possible ignition sources other than welding and cutting operations as required by Paragraph 1 of Attachment 4 to the NRC guidelines.
5. Procedures do not require the supervisor who approves welding and cutting permits to be trained in industrial fire fighting and fire prevention as required by Paragraph 2.a of Attachment 4 to the NRC guidelines.
6. Procedures do not require oxyacetylene equipment to be checked for leaks before being moved into the work area as required by paragraph 2.b.(4) of Attachment 4 to the NRC guidelines.

## RESPONSE

Because of the potential for change in the federal regulations addressing fire protection (i.e., proposed Appendix R to 10 CFR 50), we find it advisable to establish a position on each of the items listed above. Therefore, we plan to evaluate each item and either (1) implement it in accordance with the guideline, (2) implement an alternate action that will accomplish the objective of the guideline or (3) establish justification for not revising our current program. We will advise you of the results of our evaluation by October 15, 1980.