



FLORIDA POWER & LIGHT COMPANY

March 25, 1981
L-81-127

11-1-80 4:40

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:
50-250/80-38
50-251/80-37

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/JEM/ras

Attachment.

cc: Harold F. Reis, Esquire

8104220154



DRAFT RESPONSE TO USNRC IE INSPECTION REPORT 80-38/80-37

Finding A:

Technical Specification 6.4.1 requires that a retraining and replacement training program for the facility staff be maintained under the direction of the training supervisor to meet or exceed the requirements and recommendations of Section 5.5, ANSI N18.1-1971. Section 5.5 of ANSI N18.1 1971 requires that a means be provided in the training programs for appropriate evaluation of its effectiveness.

Contrary to the above, the Training Supervisor failed to implement an existing administrative procedure on the training and retraining program of nuclear operators and nuclear turbine operators in that the nuclear turbine operator on-the-job (on-shift) training records for trainee evaluation purposes were not maintained as required by AP 0303.

Response A:

- (A-1) FPL concurs with the finding.
- (A-2) The reasons for the findings are:
 - (1) Turnover of nuclear turbine operators has been significant during this past year.
 - (2) The training staff had been undermanned to handle the amount of training necessitated by the turnover.
- (A-3) As corrective action, the size of the training staff has been increased to properly support the effort required in the non-licensed operator area. The training program for nuclear turbine operators was reinitiated in January of this year and will continue in order to insure this training will be conducted as required by Administrative Procedure 0303, Nuclear Operator and Nuclear Turbine Operator Training and Retraining Program.
- (A-4) As corrective action in order to avoid further problems, (1) Review of the existing non-licensed operator training procedures will be conducted and the procedures revised if necessary to more clearly define our policies on replacement training and retraining of non-licensed operators, and (2) the Quality Control Department will periodically check the progress of the non-licensed operator training program.
- (A-5) Full compliance will be achieved by January 1, 1982.



Finding B:

Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented, and maintained that meet or exceed the requirements of Section 5.1 and 5.3 of ANSI N18.7-1972 and Appendix "A" of USNRC Regulatory Guide 1.33.

Contrary to the above, the Nuclear Plant Supervisor failed to implement an existing administrative procedure on the control of valves, locks and switches in that on December 4, 1980, the onshift nuclear plant supervisor failed to enter into the locked valve deviation log of Administrative Procedure 0103.5 the change in status of valves MOV-3-863A and B, "RHR Heat Exchanger to RWST or Alternate LHSI" which had undergone a periodic valve exercise test in accordance with Operating Procedure 0209.1. Valves MOV-3-863A and B with their associated circuit breakers are included in the valve, lock and switch list of AP 0103.5 and the status of these valves is required to be under administrative control.

Response B:

- (B-1) FPL concurs with the finding.
- (B-2) The reason for the violation was that the Nuclear Plant Supervisor assumed that the requirement to log deviations of valve positions did not apply if the repositioning was covered by another procedure.
- (B-3) As corrective action a procedure change that was reviewed and approved by the Plant Nuclear Safety Committee on March 19, 1981, to Administrative Procedure 0103.5 clarifies that when a deviation from normal line up occurs, it will be logged in the deviation log, unless it is covered by an approved plant procedure and/or equipment clearance order.
- (B-4) As corrective action in order to avoid further problems, we will review our pump and valve test procedures to ensure that when these procedures cause a valve on the locked valve list to be operated they also require it to be returned to its normal position and relocked.
- (B-5) Full compliance will be achieved by March 31, 1981.

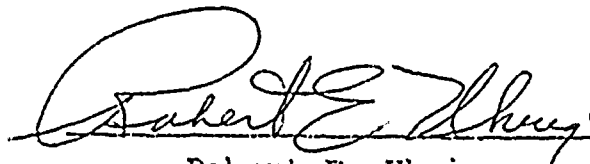


STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

25 day of March, 1981

Cheryl Z. Fredrick
NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: March 1, 1982
Notary Public, State of Florida, No. 12345
My Commission Expires March 1, 1982
Bonds and Records Section, Agency

