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 WOODY, C. D. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/87-24 &
 50-251/87-24. Corrective actions: Procedure AP 0103.2
 incorporating generally stricter overtime restrictions than
 NRC regulations issued.

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JULY 30 1987

L-87-316

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 87-24

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,

C. O. Woody
Group Vice President
Nuclear Energy Department

COW/SDF/gp

Attachment

cc: J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

8708040254 870730
PDR ADOCK 05000250
Q PDR

ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-24 & 251-87-24

FINDING:

10 CFR 50, Appendix B, Criterion V, and the licensee's accepted Quality Assurance (QA) Program (FPLTQAR 1-76A, Revision 9) collectively require that activities affecting quality be prescribed by procedures and be accomplished in accordance with these procedures. Administrative procedure 0103.2, Responsibilities of Operators and Shift Technicians On Shift and Maintenance of Operating Logs and Records, dated September 9, 1986, specifies the below listed operator overtime restrictions to be followed in event that overtime is unavoidable.

- 1) An individual should not be permitted to work more than 12 hours straight (not including shift turnover time).
- 2) There should be a break of at least 12 hours (which can include shift turnover time) between all work periods.
- 3) An individual should not work more than 72 hours in any 7-day period.
- 4) An individual should not be required to work more than 14 consecutive days without having two consecutive days off.

Contrary to the above, a review of the 1986 time cards for five randomly selected operators identified frequent overtime was worked and the following overtime restrictions were violated.

- 1) Two of the five operators worked a 14-day shift.
- 2) Two of the five operators had a work break of less than 12-hours between work periods.
- 3) Four of the five operators (on 9 separate instances) were found to have worked more than 72-hours in a 7-day period.
- 4) Three of the five operators worked more than 14 consecutive days without having two consecutive days off.



RESPONSE:

- 1) FPL concurs with the finding.
- 2) FPL fully understands the need to have well-rested operators on duty. Consequently, FPL has issued procedure AP 0103.2, "Responsibilities of Operators and Shift Technicians on Shift and Maintenance of Operating Logs and Records", which incorporates overtime restrictions generally stricter than the NRC regulations. Additionally, management has restated our more conservative overtime policy on several occasions.

AP 0103.2, and the various policy letters, vest in the Nuclear Watch Engineer (NWE) the responsibility to select and arrange personnel to fill vacancies, and to report to operations management when deviations from our stated policies are necessitated by unusual conditions. In order to implement this task, the NWE needs to know the work history of the operators on a real time basis. The present method of tracking the overtime of each operator requires posting of the overtime worked following the completion work. Often, the posting of the overtime is delayed for several days, making it difficult to obtain reliable records of the actual overtime worked. This places the NWE in the position of asking the individual operator how much rest time he has had, how many days he has worked without a rest day, or how much overtime he has worked in the last week. Reliance on the operator's memory for providing information such as this can easily result in the type of inadvertent error this violation points out.

To further aggravate the situation, the inspection covered a time during which Turkey Point was experiencing an extended outage, and many of the operators were attending the accelerated requalification program. With the temporary but high demands placed on our operators' time during this period, it became easier to commit errors resulting in excessive overtime.

- 3) As immediate corrective action, shortly following the inspections, the Operations Supervisor issued policy letters designed to distribute operator overtime equitably and thus minimize the potential for exceeding the procedural limits of AP 0103.2. The Operations Supervisor addressed the overtime issue previously in a February, 1987 letter. This letter detailed the methods to be used for compliance with AP 0103.2.
- 4) The long term corrective action will be the development of a program enabling updating an operator's work history promptly, and having this information available for the NWE's use prior to the subject operator assuming shift duty. This will alert the NWE to those operators who should not be used for shift duty.
- 5)
 - a) Full compliance for item 3 above was achieved on July 10, 1987.
 - b) Full compliance for item 4 above will be achieved by September 15, 1987.

11-11-11

