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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHORITY AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to violations noted in Insp Repts 50-250/87-32 &
 50-251/87-32. Corrective actions: steps taken to assure that
 operators in compliance prior to assuming shift duties &
 operators will be scheduled to rept to training bldg.

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AUGUST 27 1987

L-87-357

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 87-32

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

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PDR ADCK 05000250
G PDR

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ATTACHMENT

RE: TURKEY POINT UNITS 3 AND 4
DOCKET NO. 50-250, 50-251
IE INSPECTION REPORT 250-87-32 & 251-87-32

FINDING:

NUREG-0737, Item I.C.5 requires the establishment of procedures to ensure that operating experience information is supplied to operators. This item was implemented by an NRC Order dated July 10, 1981.

10 CFR 50 Appendix B Criterion XVI and the licensee's accepted quality assurance (QA) program (FPL TQAR - 1-76A) collectively require that measures be established to assure that nonconformances are promptly identified and corrected.

Administrative Procedures, AP-301, Licensed Operator Requalification Program, and AP-303, Non-Licensed Operator Initial Training and Requalification Program, require that operators who are more than 13 weeks behind on Training Report (operational experience feedback) reviews, shall not assume unit responsibility.

Operations Surveillance Procedure OSP-200.1, Schedules of Plant Checks and Surveillances, requires the Plant Supervisor - Nuclear (PS-N) to ensure all shift personnel Training Reports are up to date each shift.

Contrary to the above, on July 7, 1987, NRC inspectors determined that licensed operators and a large number of non-licensed operators were greater than 13 weeks delinquent in reviewing and acknowledging Training Reports and were continuing to assume unit responsibility.

Additionally, although measures were established to assure that noncompliances were promptly identified, they were not promptly corrected in that Corrective Action Requests (CAR's) issued by the licensee's QA organization on December 10, 1986, (CAR-86-783) and June 23, 1987, (CAR-87-028), cited a noncompliance in that licensed and non-licensed operators were being allowed to assume unit responsibilities while greater than 13 weeks delinquent on Training Reports. A letter dated January 20, 1987, cited management's response to CAR-86-783 as inadequate because both licensed and non-licensed operators were continuing to assume unit responsibility without reviewing Training Reports as required by AP-301 and AP-303. The deficiency had also been previously identified as an unresolved item by the NRC during an inspection conducted February 6, 1987, (URI-250, 251/87-07-02).



RESPONSE:

FPL concurs with the finding.

- 2) The reason for the finding has 2 major factors. Each week's report is usually very large, and the sheer volume of the reports requires the dedication of a substantial block of time for each operator to perform his reading. As the operator's have extensive regular duties, at times it has been difficult for certain operators to schedule the required time for the reviews. The check to assure the performance of the required reading has been the PS-N's responsibility. Again, due to the volume of the required reading and the multitude of signoff sheets, the PS-N's at times have not verified that each week's reading was completed by each of his operators.
- 3) Following identification of the concern, the Training Department conducted a review of training records in June 1987. The review identified the operators who were deficient in the reading of the training reports. The results of this review were provided to plant supervision and management. At that time, a concerted effort was made to bring the operating staff up to date on the review of training reports. Operations performed a second review on July 15 in order to assure that no on-shift operators were more than 13 weeks in arrears. The only operators who were identified to not be in compliance were those operators on vacation at that time. Steps were taken to assure that these operators were in compliance prior to assuming shift duties.
- 4) Until recently, 3 sets of training reports were being maintained: one set each for the on-shift operators, off-shift operators, and the non-licensed operators. The 3 separate sets have been consolidated into one central set, with 6 duplicate sets. The main and duplicate sets are maintained in the Training Building Library, thus facilitating access to all users. The operators will be scheduled to report directly to the Training Building and given a block of dedicated time in order to review the reports. The availability of the duplicate sets permits easy use of the reports by several operators at the same time. The Training Department will review the reports for missing signatures on a monthly basis. The deficient operators and the Operations Supervisor will be notified of any operator who is more than 10 weeks in arrears. If an operator exceeds the 13 week limit, his key card will be pulled and he will be denied site entry until the deficiency is corrected.
- 5)
 - a) Full compliance for item 3 above was achieved on July 31, 1987.
 - b) Full compliance for item 4 above will be achieved by August 31, 1987.

