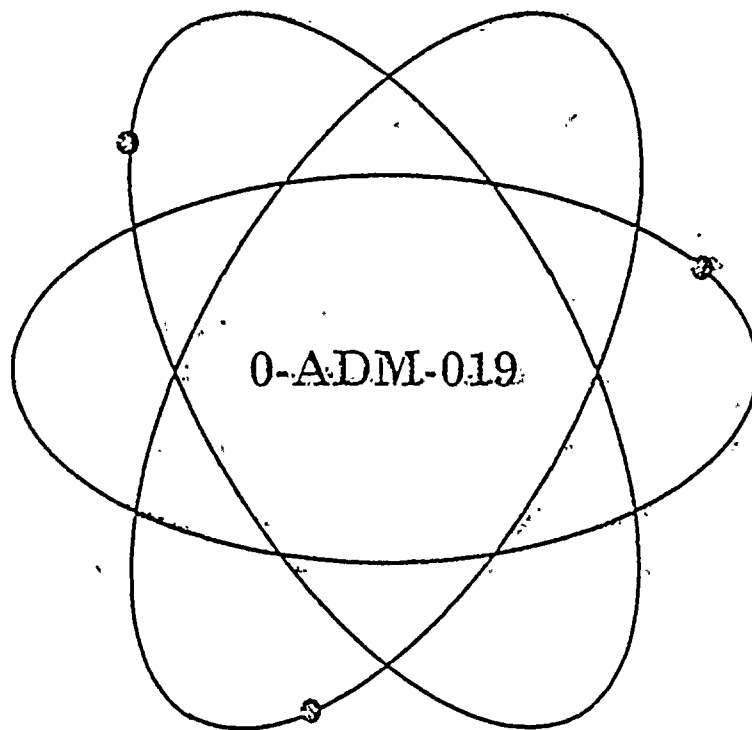


# Florida Power & Light Company

## Turkey Point Nuclear Plant



Title:

Management On Shift (MOS)

Non-Safety Related Procedure

Responsible Department:	Operations
Reviewed by PNSC:	87-290
Approved by Plant Manager-N:	10/26/87

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## 1.0 PURPOSE

- 1.1 This procedure provides administrative instructions to management personnel on shift. The instructions delineate the on shift program, guidelines, standards/policy clarifications and reporting requirements.
- 1.2 The purpose of the Management On Shift Personnel is to provide a continuous on shift oversight to monitor the safety of plant operations, both in and out of the Control Room. [Commitment - Steps 2.3.1, 2.3.2, and 2.3.3]
- 1.3 This program has been established as an FP&L commitment and in response to the NRC and shall remain in effect at least until FP&L's review of the results of the independent appraisal program and written justification for program termination explaining the basis for termination after considering the significance of any appraisal or oversight findings in the area of Plant Operations has been provided to and approved by the Region II Administrator NRC. [Commitment - Step 2.3.3]

## 2.0 REFERENCES/RECORDS REQUIRED/COMMITMENT DOCUMENTS

### 2.1 References

- 2.1.1 0-ADM-100, Procedure Preparation, Review and Approval
- 2.1.2 0-ADM-101, Writers Guide for Administrative and Normal Operations Procedures
- 2.1.3 0-ADM-913, Corrective Actions for Conditions Adverse to Quality
- 2.1.4 Inter-Office Correspondence, PTN-PMN-87-441, Management On Shift Guidelines, October 2, 1987
- 2.1.5 FP&L Letter to NRC, L-87-400, Immediate, Short-Term and Long-Term Corrective Measures, October 7, 1987
- 2.1.6 FP&L Letter to NRC, L-87-427, Augmented Management on Shift Program, October 19, 1987
- 2.1.7 NRC Order, EA-87-85, Order and Notice of Violation and Proposed Imposition of Civil Penalty, October 19, 1987



## 2.2 Records Required

### 2.2.1 Management On Shift Personnel

1. Written daily report (summary) of all on shift activities addressing shift observations, any significant safety problems or questionable work practices, actions, problems and recommendations shall be submitted by each individual MOS observer to the Operations Superintendent - Nuclear [Commitment - Step 2.3.3]

### 2.2.2 Operations Superintendent - Nuclear

1. Written daily report of all activities addressing questionable operating practices to the Site Vice President - Turkey Point Nuclear with the same day copies provided to the President of FP&L. [Commitment - Step 2.3.3]
2. Weekly Summary Report along with a compilation of daily reports to the NRC Region II Administrator. [Commitment - Step 2.3.3]

- 2.2.3 Completed copies of the below listed section(s), enclosure(s) and/or attachment(s) constitute Quality Assurance Records and shall be transmitted to Document Control and be retained for a minimum of 5 years in accordance with Quality Assurance records requirements:

1. MOS Daily Report
2. Weekly Summary Report

## 2.3 Commitment Documents

- 2.3.1 FP&L Letter to NRC, L-87-400, Immediate Short-Term and Long-Term Corrective Measures, October 7, 1987
- 2.3.2 FP&L Letter to NRC, L-87-427, Augmented Management On Shift Program, Letter October 19, 1987
- 2.3.3 NRC Order, EA 87-85, Order and Notice of Violation and Proposed Imposition of Civil Penalty, October 19, 1987

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### 3.0 RESPONSIBILITIES

#### 3.1 President of FP&L

3.1.1 The President of FP&L shall be directly responsible for the Management On Shift Program. [Commitment - Step 2.3.3]

#### 3.2 Site Vice President - Turkey Point Nuclear

3.2.1 The Site Vice President - Turkey Point Nuclear is responsible for the implementation and administration of the Management On Shift Program.

3.2.2 Site Vice President - Turkey Point Nuclear is responsible for reviewing all MOS Daily Reports.

#### 3.3 Plant Manager - Nuclear

3.3.1 The Plant Manager - Nuclear is responsible for assigning and scheduling personnel for Management On Shift Duty.

3.3.2 The Plant Manager - Nuclear is responsible for implementation and communication of plant goals and objectives to plant personnel.

#### 3.4 Operations Superintendent - Nuclear

3.4.1 Operations Superintendent - Nuclear is responsible for reviewing MOS Daily Reports and submitting the daily reports to the Site Vice President - Turkey Point Nuclear with same day copies provided to the President of FP&L. [Commitment - Step 2.3.3]

3.4.2 Operations Superintendent - Nuclear is responsible for submitting a weekly summary report along with a compilation of daily reports to the NRC Region II Administrator. [Commitment - Step 2.3.3]

#### 3.5 Management On Shift Personnel

3.5.1 Management On Shift personnel are responsible for reporting any observations of immediate safety significance immediately to the Plant Supervisor - Nuclear and Operations Supervisor in accordance with 0-ADM-913, Corrective Actions for Conditions Adverse to Quality. [Commitment - Step 2.3.3]



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- 3.5.2 Management On Shift are responsible for reporting any questionable work practices immediately to the Plant Supervisor - Nuclear and in a timely manner to the Operations Supervisor in accordance with 0-ADM-913, Corrective Actions for Conditions Adverse to Quality.
- 3.5.3 Management On Shift personnel have the authority to act where necessary to prevent personnel error and to assure quality performance in accordance with 0-ADM-913, Corrective Actions for Conditions Adverse to Quality. [Commitment - Step 2.3.3]
- 3.5.4 Each individual Management On Shift personnel is responsible for submitting an MOS Daily Report to the Operations Superintendent - Nuclear.
- 3.5.5 Management On Shift personnel are responsible for attending operations shift briefings.

#### 4.0 DEFINITIONS

##### 4.1 Management On Shift

Management team comprised of one or two man teams experienced in plant management including at least one individual (FP&L employee or contractor) who has not been assigned to Turkey Point within the previous two years and who shall hold or have held an SRO license or have previous experience in auditing and appraising the operation of commercial nuclear power plants. [Commitment - Step 2.3.3]

##### 4.2 Questionable Work Practice

These conditions are classified as Conditions Adverse to Quality.  
(See 0-ADM-913, Corrective Actions for Conditions Adverse to Quality)

##### 4.3 Immediate Safety Significance

These conditions are classified as Significant Conditions Adverse to Quality.  
(See 0-ADM-913, Corrective Actions for Conditions Adverse to Quality)

##### 4.4 Conditions Adverse to Quality

Failures, malfunctions, deficiencies or deviations in material and equipment and other nonconformances which are corrected by taking action to correct the immediate condition only. Such nonconforming conditions do not require engineering evaluation or are not reportable in accordance with 10CFR or other plant documents.



#### 4.5 Significant Conditions Adverse to Quality

Failures, malfunctions, deficiencies or deviations in material and equipment and other nonconformances which require engineering evaluation and/or evaluation for reportability in accordance with 10 CFR or other plant documents. In addition to correcting the immediate condition, corrective action for such nonconforming conditions shall identify and document the cause and include action to preclude repetition.

#### 4.6 Corrective Action

Action taken to correct a nonconforming condition with specific emphasis on prevention of recurrence.

#### 4.7 Immediate Corrective Action

Corrective action to conditions which pose a threat to plant safety or to the health and safety of the public, which could result in major equipment and material damage, or could, if not corrected, produce defects of significantly greater consequences than those immediately resulting from the condition.

#### 4.8 Routine Corrective Action

Corrective action to conditions which do not require immediate corrective action.

## 5.0 PROCEDURE

### 5.1 Management On Shift (MOS) Duties

- 5.1.1 The Management On Shift Program shall provide a continuous on-shift oversight to monitor the safety of plant operations, both in and out of the Control Room; to include operations, plant support activities and interface by at least one individual (FP&L employee or contractor) who has not been assigned to PTN within the previous two years and who shall hold or have held an SRO license or have previous experience in auditing and appraising the operation of commercial nuclear power plants: [Commitment - Step 2.3.3]
- 5.1.2 MOS personnel should communicate to employees that their objective is to provide assistance to them through constructive suggestions and active listening.
- 5.1.3 MOS personnel should attend Operation Shift briefings.
- 5.1.4 MOS personnel should utilize the end of shift 30 minute meeting to communicate their observations and comments to the individual work-groups.
- 5.1.5 Any observation of immediate safety significance shall be reported immediately to the PS-N and Operations Supervisor. [Commitment - Step 2.3.3]
- 5.1.6 The Management On Shift personnel have authority to act where necessary to prevent personnel error and to assure quality performance in accordance with 0-ADM-913, Corrective Actions for Conditions Adverse to Quality. However, final action or decisions shall be made by the PS-N unless emergency action is required to place the plant in a safe condition and/or personnel safety is jeopardized. [Commitment - Step 2.3.3]
- 5.1.7 Conduct which is unprofessional or not in accordance with plant policies and procedures shall be brought to the attention of the Plant Supervisor - Nuclear; Operation Supervisor and the direct supervisor of the personnel involved.



## 5.2 Management On Shift (MOS) Policy Clarifications

5.2.1 The conduct of Operations and Maintenance should be evaluated in the following areas:

1. Use of Procedures and correction of procedural inadequacies
2. Communications
3. Response to off normal conditions
4. Knowledge of equipment status
5. Understanding of assigned duties and responsibilities
6. Use of reference materials (FSAR, Tech Specs, Procedure Basis Documents, Vendor Manuals etc.)
7. Identification of equipment problems and corrective action taken
8. Personnel attentiveness
9. ALARA implementation

### 5.2.2 Policy Clarifications:

1. Operations Department should control of use the page system.
2. No unauthorized reading material is allowed on plant site.
3. Safety equipment (hard hats, ear plugs, etc.) shall be utilized when required in designated areas.
4. To enter the Control Room Surveillance Area permission shall be granted prior to entrance.
5. Operations is responsible for controlling Control Room activities. All Control Room activity and related plant activities shall be performed under the authorization of operations.

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### 5.3 Management On Shift (MOS) Reports

NOTE

*The daily report format should be developed utilizing Enclosure 1.*

- 5.3.1 The MOS Daily Report shall include as a minimum the following:
1. Name of MOS personnel reporting and date of report:
  2. Address the report to the Operations Superintendent - Nuclear.
  3. Plant Evolutions observed (including standard/criteria utilized)
  4. Items of Immediate Safety Significance
  5. Questionable Work Practices
  6. Actions taken
  7. Strengths
  8. Areas for Improvement
  9. Recommendations
- 5.3.2 All information provided in the MOS Daily Report shall be concise, factual, and provide any necessary surrounding circumstances.
- 5.3.3 The Weekly Summary Report based on the MOS Daily Reports shall address as a minimum the identification of the following:
1. MOS personnel on shift, including dates.
  2. Any significant deviations, items of immediate safety significance and/or questionable work practices to include EP&L response and any associated corrective actions.
  3. Strengths identified by the program.
  4. A compilation of MOS Daily Reports:

END OF TEXT



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## MOS DAILY REPORT

To: Operation Superintendent - Nuclear

Date: \_\_\_\_\_

From: \_\_\_\_\_  
(MOS Observer)Shift: ☐ Day  
☐ Night

A. Plant evolutions observed

B. Immediate safety problems



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MOS DAILY REPORT

C. Questionable work practices

D. Actions taken



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## MOS DAILY REPORT

E. Strengths

F. Area(s) for improvement

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## MOS DAILY REPORT

## G. Recommendations

Completed By: \_\_\_\_\_ Date: \_\_\_\_\_  
*MOS Observer*Reviewed By: \_\_\_\_\_ Date: \_\_\_\_\_  
*Operations Superintendent - Nuclear*

FINAL PAGE

