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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389

AUTH.NAME AUTHOR AFFILIATION
 GOLDBERG,J.H. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to Generic Ltr 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey."

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MARCH 01 1990

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

Gentlemen:

Re: St. Lucie Units 1 and 2
Turkey Point Units 3 and 4
Docket Nos. 50-335, 50-389, 50-250, & 50-251
Response to Generic Letter 90-01

NRC Generic Letter (GL) 90-01, "Request for Voluntary Participation in NRC Regulatory Impact Survey" issued on January 18, 1990, requested that nuclear utilities, on a voluntary basis, complete the questionnaire enclosed with the generic letter. The purpose of the questionnaire was to provide the NRC with insight on the time which key power plant managers spend in responding to the various operational inspections and audits.

Florida Power & Light Company (FPL) has reviewed the inspection and audit records for our St. Lucie and Turkey Point Plants and the requested survey results are enclosed. The information provided by this survey is based on estimates of the time spent by personnel interfacing with the NRC and INPO and is not traceable by documentation to specific numbers. The primary manpower impact is at the first line supervision/professional level, i.e., the level that responds directly to the inspectors before, during, and in response to the inspection. The impact at this level has been added as item 5.f. on the questionnaire. Information on the other related inspections and audits is not readily available and is not provided.

Very truly yours,

J. H. Goldberg
Executive Vice President
Nuclear Energy

JHG/GRM/slh

Enclosure

cc: Stewart D. Ebnetter, Regional Administrator, USNRC Region II
Senior Resident Inspector, USNRC, St. Lucie Plant
Senior Resident Inspector, USNRC, Turkey Point Plant

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NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

Other resident, Regional, Headquarters inspections & audits based on 1988 & 1989

2. Based on actual experience over the past several years, about how often is this activity conducted?

Average 10 Resident & 15 Regional Inspections per year

3. Operations/Construction areas covered: Inspector-days/year (I-D/YR)

Operations	93 I-D/yr	Maintenance	67 I-D/YR
Security	56 I-D/YR	Tech Support/ Eng	135 I-D/YR
Chemistry, Health Physics & Emergency Plan	89 I-D/YR		
QA & Management Programs	76 I-D/YR		

4. Extent of the activity (how many people, for how long)

Regional Inspections 6 Inspector-Days per Inspection
Resident Inspectors 362 Inspector-Days per Year or an
Average of 1.5 inspector Years/Year continuous
Average 3600 inspector hours/Year

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item # 1.

Note: Percentages listed below are the percent of the inspector-days that management is involved with the inspection for this type activity.

- a. Plant Department Heads 60% or 2160 man-hours/year
(number involved) 14
- b. Plant Manager 6% or 216 man-hours/year
- c. Corporate Department Heads 1% or 36 man-hours/year
(number involved) 15
- d. Corporate Vice Presidents 4% or 144 man-hours/year
(number involved) 3
- e. Chief Nuclear Officer 2% or 72 man-hours/year
- f. First line Supervision/Professional 400% or 14,400 man-hours/year

Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Generic Letter 90-01

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

Other resident, Regional, Headquarters inspections & audits based on 1988 & 1989

2. Based on actual experience over the past several years, about how often is this activity conducted?

Average 12 Resident & 22 Regional inspections per year

3. Operations/Construction areas covered: Inspector-days/year (I-D/YR)

Operations 127 I-D/YR, Maintenance 131 I-D/YR, Security 125 I-D/YR, Tech Support/Eng 208 I-D/YR, Chemistry, Health Physics & Emergency Plan 147 I-D/YR, Training 23 I-D/YR, QA & Management Programs 104 I-D/YR

4. Extent of the activity (how many people, for how long)

Regional Inspections 7.5 I-D/Inspector

Resident Inspectors 711 inspector-days per year or an average of 2.8 Inspector-years per year continuous

Average 7000 inspector-hours/year

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item # 1.

Note: Percentages listed below are the percent of the inspector-days that management is involved with the inspection for this type activity.

a. Plant department Heads 38% or 2660 man-hours/year
(number involved) 14

b. Plant Manager 4% or 280 man-hours/year

c. Corporate Department Heads 4% or 280 man-hours/year
(number involved) 15

d. Corporate Vice Presidents 3% or 210 man-hours/year
(number involved) 3

e. Chief Nuclear Officer 3% or 210 man-hours/year

f. First line Supervision/Professional 400% or 28,000 man-hours/year

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

NRC Team Inspections based on 1988 & 1989

2. Based on actual experience over the past several years, about how often is this activity conducted?

Average 4.5 inspections per year

3. Operations/Construction areas covered:

Inspection areas: EOP, EQ, QA Effectiveness, ISI, RG 1.97, SALP, & Maintenance

4. Extent of the activity (how many people, for how long)

Average 5 inspectors per team

Average of 50 inspector-days per inspection

Average of 1800 inspector-hours/year

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item # 1.

Note: Percentages listed below are the percent of the inspector-days that management is involved with the inspection for this type activity.

- a. Plant Department Heads 45% or 810 man-hours/year
(number involved) 14
- b. Plant Manager 7% or 126 man-hours/year
- c. Corporate Department Heads 8% or 144 man-hours/year
(number involved) 15
- d. Corporate Vice Presidents 4% or 72 man-hours/year
(number involved) 3
- e. Chief Nuclear Officer 3% or 54 man-hours/year
- f. First line Supervision/Professional 400% or 7200 man-hours/year

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

NRC Team Inspections based on 1988 & 1989

2. Based on actual experience over the past several years, about how often is this activity conducted?

Average 8 inspections per year

3. Operations/Construction areas covered:

Inspection areas: Fire Protection, Management Programs, ALARA, Allegation, 1 Training, EQ, SALP, & Maintenance

4. Extent of the activity (how many people, for how long)

Average 6 inspectors per team
Average of 42 inspector-days per inspection
Average of 2700 inspector-hours/year

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item # 1.

Note: Percentages listed below are the percent of the inspector-days that management is involved with the inspection for this type activity.

- a. Plant department Heads 67% or 1800 man-hours/year
(number involved) 14
- b. Plant Manager 11% or 312 man-hours/year
- c. Corporate Department Heads 22% or 594 man-hours/year
(number involved) 15
- d. Corporate Vice Presidents 3% or 135 man-hours/year
(number involved) 2
- e. Chief Nuclear Officer 4% or 108 man-hours/year
- f. First line supervision/Professional 400% or 10,800 man-hours year



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St. Lucie Units 1 & 2
Turkey Point Units 3 & 4
Docket Nos. 50-250, 50-251, 50-335 & 50-389
Generic Letter 90-01

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

INPO Corporate Evaluation

2. Based on actual experience over the past several years, about how often is this activity conducted?

Average of 1 per 12-18 months

3. Operations/Construction areas covered:

Maintenance & Outage Management, Material & Outside Services, Technical Services, Design Engineering, Document Control, Human Resources, Independent Monitoring & Assessment Groups, Industrial Safety, Training & Qualification, Radiological Protection, Chemistry, & Emergency Preparedness.

4. Extent of the activity (how many people, for how long)

10 evaluators per evaluation
50 evaluator-days per evaluation
400 evaluator-hours per evaluation

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item # 1.

- a. Plant Department Heads 12% or 48 man-hours/year (number involved) 20
- b. Plant Manager 4% or 14 man-hours/year
- c. Corporate Department Heads 35% or 140 man-hours/year (number involved) 15
- d. Corporate Vice Presidents 18% or 72 man-hours/year (number involved) 3
- e. Chief Nuclear Officer 16% or 64 man-hours/year (includes CEO & President)
- f. First line supervision/Professional 750 man-hours/year



NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

INPO St. Lucie Plant Evaluation

2. Based on actual experience over the past several years, about how often is this activity conducted?

Average of 1 per 15-18 months

3. Operations/Construction areas covered:

Operations, Maintenance, Technical Support, Training and Qualification, Radiological Protection, Chemistry, Operating Experience Review, Emergency Preparedness, Outage Management.

4. Extent of the activity (how many people, for how long)

20 evaluators per stet
180 evaluator-days per stet
1440 evaluator-hours per yr

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 52% or 746 man-hours/year
(number involved) 14
- b. Plant Manager 5% or 80 man-hours/year
- c. Corporate Department Heads 3% or 40 man-hours/year
(number involved) 15
- d. Corporate Vice Presidents 2% or 30 man-hours/year
(number involved) 3
- e. Chief Nuclear Officer 2% or 30 man-hours/year (includes CEO and President)
- f. Management & Supervision 110% or 1600 man-hours/year



NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

INPO Turkey Point Plant Evaluations
2. Based on actual experience over the past several years, about how often is this activity conducted?
 - a. INPO plant evaluations every 12 months
 - b. Annual simulator evaluation
3. Operations/Construction areas covered:

Operations, Maintenance, Technical Support, Training and Qualification, Radiological Protection, Chemistry, Operating Experience Review, Emergency Preparedness, Outage Management.
4. Extent of the activity (how many people, for how long):
 - a. 20 people, approximately 2 weeks, approximately 1720 evaluator-hours/yr
 - b. 3 people, approximately 1 week, approximately 215 evaluator-days/yr
5. Approximate percentage of the total time (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1:
 - a. Plant Department Heads 19% or 320 man-hours/year (number involved) 4
 - b. Plant Manager 12% or 208 man-hours/year (number involved) 1
 - c. Corporate Dept. Heads 35% or 600 man-hours/year (number involved) 15
 - d. Corporate Vice Presidents 5% or 90 man-hours/year (number involved) 3
 - e. Chief Nuclear Officer 5% or 80 man-hours/year
 - f. Management & Supervision 170% or 2960 man-hours/year (number involved) 38

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

NRC Required QA Audits

2. Based on actual experience over the past several years, about how often is this activity conducted?

Approximately 35 per year

3. Operations/Construction areas covered:

Not required

4. Extent of the activity (how many people, for how long)

Approximately 2 auditors/audit
Approximately 30 auditor days/audit
Approximately 1050 auditor days/year
Approximately 8400 auditor hours/year

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

Note: Percentages listed below are the percent of the auditor-days that management is involved with the audit for this type activity.

- a. Plant Department Heads 3% or 280 man-hours/year (number involved) 14
- b. Plant Manager 2% or 140 man-hours/year
- c. Corporate Department Heads 1% or 84 man-hours/year (number involved) 15
- d. Corporate Vice Presidents 2% or 140 man-hours/year (number involved) 3
- e. Chief Nuclear Officer <1% or 70 man-hours/year
- f. First Line Supervision/Professional 50% or 4200 man-hours/year

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

NRC Required QA Audits

2. Based on actual experience over the past several years, about how often is this activity conducted?

Approximately 59 per year

3. Operations/Construction areas covered:

Not required

4. Extent of the activity (how many people, for how long):

Approximately 3.1 auditors/audit
Approximately 41 auditor-days/audit
Approximately 2400 auditor-days/year
Approximately 19,200 auditor-hours/year

5. Approximate percentage of the total time (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1:

Note: Percentages listed below are the percent of the auditor-days that management is involved with the audit for this type activity.

- a. Plant Department Heads 10% or 1920 man-hours/year
(number involved) 14
- b. Plant Manager 1% or 190 man-hours/year
- c. Corporate Dept. Heads 5% or 960 man-hours/year (number involved) 15
- d. Corporate Vice Presidents <1% or 118 man-hours/year
(number involved) 3
- e. Chief Nuclear Officer <1% or 118 man-hours/year
- f. First Line Supervision/Professional 50% or 9600 man-hours/year

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

Self Assessments

2. Based on actual experience over the past several years, about how often is this activity conducted?

Approximately 21 per year
Continuous Performance Monitoring

3. Operations/Construction areas covered:

Plant Operations, Maintenance, Training, Health Physics, Chemistry Engineering, Technical Support, IMA, etc.

4. Extent of the activity (how many people, for how long)

Independent Management Appraisal 2,000 man-hours
Approximately 2 auditors/assessment
Approximately 30 man-days/assessment
Approximately 650 man-days/year
Approximately 5200 man-hours/year
Total 27,200 man-hours/year

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

- a. Plant Department Heads 7504 man-hours/year (number involved) 14
- b. Plant Manager 668 man-hours/year
- c. Corporate Department Heads 7,668 man-hours/year (number involved) 15
- d. Corporate Vice Presidents 1,584 man-hours/year (number involved) 3
- e. Chief Nuclear Officer 242 man-hours/year
- f. First Line Supervision/Professional 27,000 man-hours/year

NRC REGULATORY IMPACT SURVEY
QUESTIONNAIRE SHEET

1. Type of inspection, audit or evaluation:

Self Assessments

2. Based on actual experience over the past several years, about how often is this activity conducted?

Approximately 45 per year
Continuous Performance Monitoring

3. Operations/Construction areas covered:

Plant Operations, Maintenance, Chemistry, Health Physics, Technical Support, Training, Engineering, etc. Independent Management Appraisal, Performance Monitoring

4. Extent of the activity (how many people, for how long):

Independent Management Appraisal 20,000 man-hours/year
Approximately 3.1 auditors/assessment
Approximately 41.25 man-days/assessment
Approximately 1900 man-days/year
Approximately 15,200 man-hours/year
Total 55,200 man-hours/year

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during and in response to the activity described in Item #1:

a. Plant Department Heads 8,080 man-hours/year (number involved) 14

b. Plant Manager 860 man-hours/year

c. Corporate Dept. Heads 7,860 man-hours/year (number involved) 15

d. Corporate Vice Presidents 1,680 man-hours/year (number involved) 3

e. Chief Nuclear Officer 400 man-hours/year

f. First Line Supervision/Professional 57,600 man-hours/year

