

FLORIDA POWER & LIGHT COMPANY

April 20, 1981

L-81-174

Mr. Victor Stello, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stello:

Re: Turkey Point Unit 3  
Docket No. 50-250  
10 CFR 2.201 Response to  
Notice of Violation dated February 18, 1981

The attachment to this letter contains Florida Power & Light Company's reply to your letter and Notice of Violation of February 18, 1981 as required by 10 CFR 2.201. Our reply pursuant to 10 CFR 2.205 has been provided separately as requested.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/RAK/mbd

Attachment

cc: Mr. J.P. O'Reilly, Region II  
Harold F. Reis, Esquire

8106260360



ATTACHMENT

Finding:

10 CFR 50.54(k) states that an operator or senior operator licensed pursuant to Part 55 of this chapter shall be present at the controls at all times during operation of the facility. Technical Specification 6.8.1 requires that written procedures and administrative policies be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972, Appendix "A" of USNRC Regulatory Guide 1.33; this includes plant operating procedures. Plant Operating Procedure 0103.2, Responsibilities of Operators On-Shift and Maintenance of Operating Logs and Records, states in Section 5.3.3 that the Nuclear Control Center Operator (NCCO) shall have an unobstructed view of and access to the control panels, including instrumentation displays and alarms. He shall not leave the Surveillance Area (Figure 1) for any non-emergency reason without obtaining a qualified relief. Section 5.3.4 states that a single operator shall not assume the NCCO responsibility for both units at the same time unless so directed and such action is in compliance with Technical Specification 6.2.2 or is necessitated by emergency conditions.

Contrary to the above, at about 11:45 a.m. on January 29, 1981, the NRC Resident Inspector observed Turkey Point Unit 3 operating at full power without an operator present at the controls. The assigned Unit 3 operator was in a room behind the Unit 4 instrument panels which precluded visually monitoring the Unit 3 reactor conditions. The room, although open to the control room, is outside the surveillance area specified in Plant Operating Procedure 0103.2. A qualified relief had not been obtained and an operator leaving the surveillance area was not necessitated by an emergency condition, nor was the Unit 4 operator directed to assume NCCO responsibilities for both units.

Response:

1. (1-1) FPL concurs with the finding, however, as discussed in our reply pursuant to 10 CFR 2.205, we take exception to the severity level classification.
- (1-2) The reason for the violation was that the Nuclear Control Center Operator (NCCO) did not adhere to the procedural requirement to obtain a relief prior to leaving the surveillance area.
- (1-3) As corrective action:
  - (1) The surveillance area has been re-defined and permanent red colored floor tiles have been installed to outline the surveillance area boundary.

- (2) Changes have been made to Administrative Procedure 0103.2, Responsibilities of Operators On-Shift and Maintenance of Operating Logs and Records, which redefined the proper procedure which must be taken by the NCCO in order to leave the surveillance area. The third NCCO on shift is now required to normally stay in the surveillance area and to verbally notify and obtain acknowledgment from each operator with unit responsibility prior to leaving the surveillance area.
- (3) A name display system has been implemented that positively identifies the operator who has unit responsibility. In order to transfer unit responsibility from one operator to another, the name display must be changed by the oncoming operator as part of his turnover acknowledgement.
- (4) All operators have been instructed in writing of their responsibilities.
- (5) Plant management has begun a program of random visits to the Control Room at unannounced intervals. During these visits, the management will verify that the licensed operators are continuing to perform their duties in a professional manner.

(1-4) We will also take the following long and short term corrective actions to avoid similar problems in the future.

Short term:

- (1) The surveillance area boundaries will be redefined by April 30, 1981 to fully meet the intent of Regulatory guide 1.114 as discussed at the management meeting with I&E personnel.
- (2) FP&L Management will conduct meetings with Licensed Operators by May 31, 1981 to emphasize the importance of this issue, to provide guidance on compliance with the Regulatory Guide, and to discuss management enforcement actions that will be taken should further deficiencies occur.
- (3) Movable rope or chain barriers will be placed at appropriate openings to the surveillance area boundaries by May 15, 1981 to give a more physical means of identifying the surveillance area and to limit access to this area by non licensed personnel.
- (4) Plant management will conduct meetings with Licensed Operators to discuss Operator concerns, management policies, and Operator safety responsibilities.



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Long term:

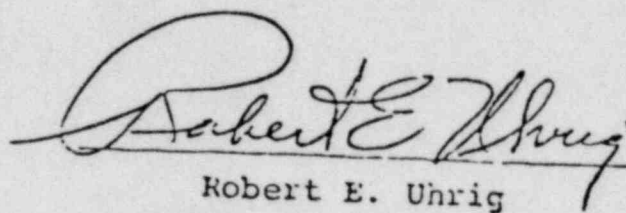
- (1) A human factors engineering study of the Control Room layout will be conducted by January 1, 1982.
  - (2) The Nuclear Watch Engineer's office will be modified by January 1, 1982 to allow him to see the control panels while in his office.
  - (3) Other physical changes will be made to permanently relocate such items as water fountains, chart lockers, bookcases and coffee pots in short term item 1, above. This will be accomplished by January 1, 1982.
- (1-5) Immediate corrective action was taken on January 29, 1981, in response to the violation. Additional corrective action, described in 1-3 above, was taken between January 30, 1981 and February 13, 1981. Additional short and long term corrective action to enhance compliance will be completed by the dates provided with each item in 1-4 above.

STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     ) .     ss.

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

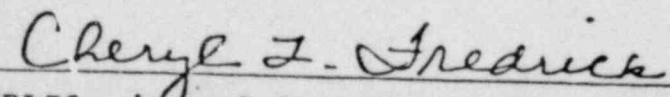
That he is a Vice President of Florida Power & Light Company,  
the Licensee herein;

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

20 day of April, 1981

  
NOTARY PUBLIC, in and for the county of Dade,  
State of Florida

My commission expires: Notary Public, State of Florida at Large  
My Commission Expires October 30, 1983  
Bonded thru Maynard Bonding Agency