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October 31, 1985

Mr. Joseph Felton, Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST
FOIA-85-729
Rec'd 11-4-85

RE: FREEDOM OF INFORMATION ACT REQUEST

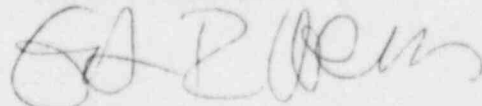
Dear Mr. Felton,

Pursuant to the federal Freedom of Information Act, I hereby request a copy of each of the following:

1. NRC's recent "system evaluation" of the auxiliary feedwater system at Turkey Point Units 3 and 4. This evaluation is more fully described in the attached article which appeared in the October 29, 1985 issue of "Inside NRC".
2. All related documents including but not limited to reports, memoranda, notes, drafts prepared by NRC staff and/or contractors in connection with this system evaluation.
3. All documents prepared by Florida Power and Light and/or its contractors, employees or agents in connection with this system evaluation or in response to the evaluation.

Your response within ten days will be appreciated.

Very truly yours,



Ellyn R. Weiss

ENC.

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Inside N.R.C.



An exclusive report on the U.S. Nuclear Regulatory Commission

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PROTESTS NRC REVIEWS OF INPO-ACCREDITED TRAINING PROGRAMS

The Institute of Nuclear Power Operations (INPO) is asking NRC Executive Director for Operations William Dircks to stop the NRC staff from checking on utility training programs after INPO has accredited them. INPO President Zack Pate has also written the NRC commissioners asking their help in reining in the staff. The staff activities, Pate said, "are impeding or undermining INPO efforts."

The NRC commissioners agreed last year not to pass new training rules for two years so INPO could prove that voluntary utility efforts to meet INPO accreditation standards produced superior results. The commissioners said, however, that the staff would monitor the situation (INRC, 1 April, 13). In July, INPO and NRC signed a coordination plan. Pate wrote: "INPO has cooperated fully with the NRC in this area and recognizes the NRC's need to monitor training progress." But some recent NRC actions, he said, "are not in keeping with the...coordination plan."

Pate complained of staff actions in three areas. First, he said, the staff has distributed Nureg/CR-4344, "Instructional Skills Evaluation in Nuclear Industry Training." The document duplicates material in two INPO documents but contains some different recommendations, he said, adding, "NRC issuance of documents that duplicate INPO training-related documents is specifically precluded by the coordination plan."

Second, without consulting INPO, NRC's Office of Nuclear Reactor Regulation (NRR) announced it will conduct "post-accreditation reviews of (INPO) accredited training programs using newly developed criteria," Pate wrote. "Superimposing these reviews on the accreditation process and the performance-oriented inspections conducted by I&E (NRC Office of Inspection & Enforcement) and

(Continued on page 4)

FIRST NRC 'SYSTEM EVALUATION' SLAMS TURKEY POINT MAINTENANCE

The first of NRC's new system evaluations, on the auxiliary feedwater (AFW) system at Florida Power & Light Co.'s (FPL) Turkey Point-3 and -4, has resulted in a report harshly critical of FPL's maintenance, training, modification design and testing, and quality assurance at the plant. According to the report, a special NRC inspection team assessing the operational readiness of the AFW system found modifications made without analysis of their safety impacts, operators untrained in the system's peculiarities, design flaws that could lead to uncontrolled radiation releases in a steam generator tube rupture or total loss of AFW flow control valves, a maintenance backlog that kept control room instruments out of service for months, and a maintenance training program suspended since March 1984 while the training department prepared programs to meet Institute of Nuclear Power Operations (INPO) accreditation requirements.

The inspection is the first of at least three system evaluations that the NRC staff plans to perform while developing new performance-based regulatory criteria. The other plants have not been named. The shift is occurring as the NRC staff takes a tougher regulatory line after a series of plant mishaps blamed on poor plant management (INRC, 14 Oct., 1). Besides forcing management attention to what NRC perceives as lingering maintenance problems at Turkey Point (INRC, 30 Sept., 1), the staff will be using the inspection findings to develop new methods to get substantial changes at poorly managed plants.

For the inspection, NRC called in design and engineering experts from NRC headquarters and Region II and NRC contractors. They started with the AFW system as described in the operating license and then traced modifications, looking for design control, maintenance and surveillance quality, operating procedures, and adequacy of testing, especially after modifications or maintenance. In his let-

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ter accompanying the inspection report, James Taylor, director of the Office of Inspection & Enforcement (IE), said 10 findings could result in enforcement action.

FP&L has not yet responded formally to the report, according to spokeswoman Stacy Shaw, but the utility has protested several findings, in the exit interview and in a subsequent letter (INRC, 14 Oct., 19). Taylor noted that management began a "performance enhancement program" after receiving low ratings on the last SALP (systematic assessment of licensee performance) report, but said, "The inspection team noted that performance in the functional areas of maintenance, surveillance testing, and design changes and modifications has not markedly improved." Taylor said he understood the utility "took prompt action...to address the team's safety concerns," adding NRC will follow up.

Specific findings from the report included:

—The safety grade backup air system for the non-safety grade instrument air system, vital to keeping AFW flow control valves (and the system) operating, had never been functionally tested though it had been "substantially modified." A test showed operators had only six to seven minutes, instead of 15 to 20 minutes, to valve in new nitrogen bottles to the backup system in the worst case. Response would have been hampered by an incorrect annunciator response procedure, and the annunciator alarm set-point was halved without a safety evaluation. "The team concluded that the weaknesses identified...could have all contributed to a significant risk of a loss of AFW flow."

—The AFW system is shared by Turkey Point-3 and -4, and its design basis requires that one pump be able to remove decay heat from both units. However, operators must assure the correct division of flow between the units. Operators were not trained in the situation and their procedures did not cover it.

—The AFW turbine steam supply isolation valves could not be shut from the control room if an AFW actuation signal was present. Operators had no training to recognize the signal's override of control room switches. "The team concluded that the lack of operator awareness that the steam flowpaths in question could not be isolated remotely from the control room could have resulted in an unnecessary and potentially significant radioactive release to the environment following a steam generator tube rupture."

—"Programmatic weaknesses" were found in maintenance, including "the consistent failure to evaluate the root cause of equipment malfunctions and to trend these failures to provide input to the preventive maintenance program," though key parts of the AFW system had experienced recurrent component failures.

—"Formal classroom training sessions for maintenance technicians had been discontinued in August 1984. Licensee management stated that maintenance training had been discontinued to dedicate training resources to developing training materials required to support INPO accreditation of the maintenance training program....A very limited amount of on-the-job training and vendor supplied training had been conducted since the decision to discontinue classroom training."

—"Over half of the I&C (instrument & control) technicians that conduct surveillance tests (15 of 27 at the time of the inspection) had an average of less than 6.5 months of experience at Turkey Point. The electrical and mechanical maintenance groups have also recently experienced high turnover rates among their technicians."

—"Management controls did not exist to ensure that safety related maintenance activities were performed by qualified personnel....Maintenance procedures generally lacked detail. Complex safety related maintenance activities were often considered to be within the scope of the 'skill of the trade' and therefore not requiring procedures....Post-maintenance testing requirements were typically not included as part of electrical and I&C plant work orders (PWOs)."

—"The apparent result was "a large backlog of safety related PWOs throughout both units." Steam jet air ejector process radiation monitors had been out of service about six months, the unit 4 containment sump high level annunciator had been out since December 1984 and two of four post-accident sump level monitors out since February, and several area radiation monitors on both units were out of service for greater than six months. Both units had leaking power operated relief valves (porvs) and unit 4's block valves also leaked, resulting in elevated temperatures in the common discharge pipe downstream of the pressurizer safety relief valves. As a result of the last, all three unit 4 control room annunciators continuously showed alarms, impairing operators' ability to recognize relief valve failures.

—"During a system walkdown, the drain lines on the turbine casings and the exhaust silencers were noted to be hot. Water was flowing from the drains on the A and C turbines. The steam supply isolation valves for the A and C turbines were leaking and allowing steam to reach the turbines even though the valves were closed....The associated steam supply valves on unit 4 also appeared to be leaking....The B turbine did not appear to have any leakage from its steam supply valves....No current

PWOs were noted on the leaking steam supply valves."

—Seismic qualification "was not being properly maintained," with control air lines not properly anchored and a temporary scaffolding erected above all four instrument racks for both units' AFW flow transmitters so that a collapse could have failed all AFW.

—"Programmatic weaknesses" were found in the design change process. "The engineering group often did not provide post-modification testing requirements....Modifications were installed without a detailed design analysis....Design bases for safety related systems were difficult to retrieve." The team found the utility "frequently base(d) design changes on engineering judgment that the new design was bounded by the original design analysis. Documentation justifying the engineering judgment typically did not exist."

—At least partially as a result, "Four of six AFW steam supply isolation valve motor operators were changed from AC to DC motors without adequate design analysis. Motor overload protection for the new DC motors was not properly sized. Further, the new power cables were not properly sized to ensure adequate operating voltage for the motor operators in the event of a loss of off-site power. The licensee had not performed any cable sizing calculations to support this design change."

—Potentials for common mode failures were introduced by design changes. Common relays and limit switches were put into redundant Train A and B flow control circuits and design of nitrogen backup systems could fail redundant control room annunciator circuits.

—Safety related station batteries were modified but no calculations were done to show the new ones could meet the design basis and plant procedures and technical specifications were not changed to recognize the new batteries' different requirements.

—"Excessive reliance was placed on operator action instead of design features to ensure the proper functioning of the AFW system."

—"A review of the corporate and site quality assurance (QA) auditing activities revealed that these audits, as implemented, neither had identified nor were capable of identifying quality concerns of a technical and operational nature" like those NRC found. "Both the corporate vendor audit and the plant audit programs were designed to assure that QA programs met NRC requirements and licensee commitments from a programmatic basis only....(which) meant that FP&L management was not receiving important feedback on the quality of activities affecting the safe operation of the plant."

Several industry sources said FP&L was objecting to some of the report's conclusions and pressing to have them changed. They said industry groups are concerned about the apparent new militancy in the NRC staff and will try to get the NRC commissioners or friendly members of Congress to intervene.

In developing performance indicators, NRC is also conducting special maintenance program reviews at seven plants. William Russell of the Office of Nuclear Reactor Regulation said NRC is ahead in developing performance indicators in the maintenance area since staffers have already been visiting plants to determine where industry initiatives are working and where NRC action is needed (INRC, 19 Aug., 1). Turkey Point is also on that list, with a review scheduled for later this year, along with Carolina Power & Light Co.'s Brunswick and Arkansas Power & Light Co.'s Arkansas Nuclear One. Program reviews have already been done at Northeast Utilities' Millstone, Toledo Edison Co.'s Davis-Besse, Sacramento Municipal Utility District's Rancho Seco, and Wisconsin Public Service Corp.'s Kewaunee.

Region II Administrator Nelson Grace noted INPO and the Nuclear Utility Management & Human Resources Committee (Numarc) want NRC to stay out of management areas and said he agreed NRC should not be managing plants. But, he said, "We can and must touch on those areas, to the extent that all of our (inspection) findings must be laid at the doorstep of top management....The buck stops there."—Margaret L. Ryan and Eric Lindeman, *Washington*

MERITS OF USER FEE SCHEME TO BE RESOLVED BY HOUSE-SENATE CONFERENCE

The merits of a proposed scheme by which NRC would be required to collect user fees to offset 50% of its authorized budget will be battled out by House and Senate conferees when a budget conference begins meeting this week. The House was expected to approve by the end of last week its version of the budget reconciliation bill, which includes the user fee scheme. Since the proposal is not included in the Senate version of the bill, it will first be considered by that body in conference.

The conference is expected to continue for at least a week, so it is uncertain when the user fee provision will be considered. In the meantime, industry lobbyists are working to kill the provision, questioning the basis for setting budget recovery at 50%. Fighting in the industry's corner is Rep. Dan Rostenkowski (D-Ill.), chairman of the House Ways & Means Committee, who argued before the Rules Committee that the user fee is really a tax and so must be considered by his committee first. The