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FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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PEEBLES, T.A. Region 2 (Post 820201)

SUBJECT: Provides responses to concerns raised in Sections 05.3 & 08
of 980723 exam rept administered on 980622-26.

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FPL

Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

October 1, 1998

L-98-242
10CFR 55.5

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Attn: Mr. Thomas A. Peebles
Chief, Operator Licensing and
Human Performance Branch

'98 OCT -6 2 4 :25

Atlanta Federal Center
61 Forsyth St., SW
Suite 23T85
Atlanta, GA 30303

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Operator License Training Program
NRC Examination Report 98-301 Response

On July 23, 1998, NRC issued St. Lucie Units 1 and 2 Examination Report 98-301 for the Operator License Examination administered on June 22-26, 1998. Section O5.3 of the report described an NRC concern with examination security precautions and provided a recommendation for future examinations. Additionally, Section O8 of the report described significant delays in completing certain emergency actions during simulator scenarios. The examiner observations indicated that there could be a previously unidentified problem with St. Lucie Units 1 and 2 emergency operating procedures and/or with the training of operators to perform the procedures. NRC requested that Florida Power & Light Company (FPL) provide the results of the analysis as a prelude to its selection of a course of action to follow up on the observations and the potential issues raised thereby.

The FPL responses to the concerns raised in Sections O5.3 and O8 of the report are attached. Should you have any questions, please contact us.

Very truly yours,

J. A. Stall
Vice President
St. Lucie Plant

JAS/GRM

Attachment

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PDR ADOCK 05000335
V PDR

an FPL Group company

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St. Lucie Units 1 and 2
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NRC Concern Section 05.3:

The NRC concluded that inadequate implementation of security precautions led to packaging of examination materials in a single envelope that was delivered to the NRC in an opened condition. Future examination development should include strict adherence to security guidelines in NUREG 1021 to minimize the possibility of examination compromise and the delay or cancellation of an examination.

FPL Response:

Condition Report 98-0887 was issued to document the analysis and corrective actions for inadequate implementation of operator license examination security precautions that lead to improper shipping of the final examination materials to the NRC with respect to examination security. The actions taken by FPL are summarized below.

1. The deficiencies discussed concerning the shipment of the licensing examinations have been reviewed with our examination developer.
2. Training Guideline 004, *Written Examination Administration and Control*, has been revised to include an Appendix D, "NRC Exam Construction and Administration," that incorporates NUREG-1021, *Operator Licensing Examination Standards For Power Reactors*, guidance on packaging the examination for shipment to the NRC in a double envelope.
3. Examinations being sent to the NRC are now required to go through the Licensing Department to provide an independent check.

NRC Concern Section 08:

The NRC noted that confusion existed among the candidates with regards to the expectations of performing the immediate operator actions in the standard post trip actions (SPTA) section of the emergency operating procedures (EOP). Training on the implementation of the SPTAs, together with insufficient procedural guidance led to poor candidate performance. The procedural guidance and training of the operators combined to result in less than optimal mitigation of the events.

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FPL Response:

Condition Report 98-1296 was issued to document the analysis and corrective actions for the NRC concern identified in Section O8. The actions taken by FPL are summarized below.

1. Licensed operator candidates from this examination group had a training session with representatives of training and operations management to reiterate expectations regarding EOP-01, *Standard Post Trip Actions*, implementation. After the session, there was a simulator exercise to reinforce these expectations.
2. Procedure 2-EOP-01, *Unit 2 Standard Post Trip Actions*, was revised to include verification of main steam line isolation system (MSIS) actuation if containment pressure is greater than or equal to 3.5 psig.
3. Administrative Procedure AP-0010120, *Conduct of Operations*, was revised to clarify guidance in the areas of:
 - a. Operator actions permitted/expected prior to assistant nuclear plant supervisor (ANPS) concurrence.
 - b. Expected operator action while performing EOP-01, *Standard Post Trip Actions*.
4. Licensed operator requalification segment 98.5 included scenarios similar to those in the recent NRC license examination. Operators were evaluated on the simulator in an 'as found' condition with various post trip malfunctions. No problems were observed with operators not taking actions when appropriate as observed during the licensing examinations. Seventy-three operators were observed. Expected operator actions while in EOP-01 are also being stressed in simulator scenarios.
5. Operators were trained on the revisions to the AP-0010120, *Conduct of Operations*, and 2-EOP-01, *Unit 2 Standard Post Trip Actions*.