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**NRC CLOSED PREDECISIONAL
ENFORCEMENT CONFERENCE**

ST. LUCIE NUCLEAR PLANT

AUGUST 19, 1996

NRC CLOSED PREDECISIONAL ENFORCEMENT CONFERENCE

ST. LUCIE NUCLEAR PLANTS

AUGUST 19, 1996

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PREDECISIONAL ENFORCEMENT CONFERENCE AGENDA

ST. LUCIE
AUGUST 19, 1996, AT 1:00 P.M.
NRC REGION II OFFICE, ATLANTA, GEORGIA

- I. OPENING REMARKS AND INTRODUCTIONS
L. Reyes, Deputy Regional Administrator
- II. NRC ENFORCEMENT POLICY
B. Uryc, Director
Enforcement and Investigation Coordination Staff
- III. SUMMARY OF THE ISSUES
L. Reyes, Deputy Regional Administrator
- IV. STATEMENT OF CONCERNS / APPARENT VIOLATIONS
J. Jaudon, Acting Deputy Director
Division of Reactor Projects
- V. LICENSEE PRESENTATION
T. Plunkett, President, Nuclear Division
Florida Power and Light
- VI. BREAK / NRC CAUCUS
- VII. NRC FOLLOWUP QUESTIONS
- VIII. CLOSING REMARKS
L. Reyes, Deputy Regional Administrator

EXPECTED ATTENDEES

Licensee

T. Plunkett, President, Nuclear Division
W. Bohlke, Vice President, Engineering
A. Stali, Site Vice President, St. Lucie
J. Holt, Information Services Supervisor
E. Benken, Licensing Engineer

NRC

L. Reyes, Deputy Regional Administrator, Region II (RII)
J. Jaudon, Acting Deputy Director, Division of Reactor Projects (DRP),
RII
A. Gibson, Director, Division of Reactor Safety (DRS), RII
B. Uryc, Director, Enforcement and Investigation Coordination Staff
(EICS), RII
C. Casto, Chief, Engineering Branch, DRS, RII
K. Landis, Chief, Reactor Projects Branch 3, DRP, RII
T. Peebles, Chief, Operating Licensing Branch, DRS, RII
C. Evans, Regional Counsel, RII
M. Miller, Senior Resident Inspector, St. Lucie, DRP, RII
E. Lea, Project Engineer, Reactor Projects Branch 3, DRP, RII
L. Mellen, Project Engineer, Reactor Projects Branch 3, DRP, RII
L. Wiens, Senior Project Manager, Reactor Projects II/2, NRR

OPENING REMARKS AND INTRODUCTIONS

(L. Reyes)

Good morning. I am Luis Reyes, Deputy Regional Administrator for the Nuclear Regulatory Commission's Region II Office. This morning we will conduct a predecisional enforcement conference between the NRC and **St. Lucie** which is **CLOSED** to public observation.

The agenda for the conference is shown in the viewgraph. Following my brief opening remarks, Mr. Bruno Uryc, the Director of the Region II Enforcement Staff, will discuss the Agency's Enforcement Policy. I will then provide introductory remarks concerning my perspective on the events to be addressed today. Johns Jaudon, Acting Deputy Director of the Division of Reactor Projects, will then discuss the apparent violations. You will then be given an opportunity to respond to the apparent violations. In this regard, I wish to reiterate to you that the decision to hold this conference does not mean that the NRC has determined that violations have occurred or that enforcement action will be taken. This conference is an important step in arriving at that decision.

Following your presentation, I plan to take about a 10-minute break so that the NRC can briefly review what it has heard and determine if we have follow-up questions. Lastly, I will provide concluding remarks.

At this point, I would like to have the NRC staff introduce themselves and then ask you to introduce your participants.

[INTRODUCTIONS]

Thank you.

Mr. Uryc will now discuss the Agency's Enforcement Policy.

NRC ENFORCEMENT POLICY
(B. Uryc)

NRC Enforcement Policy and Procedure

After an apparent violation is identified, it is assessed in accordance with the Commission's Enforcement Policy, which was recently revised and became effective on June 30, 1995. The Enforcement Policy has been published as NUREG-1600.

The assessment of an apparent violation involves categorizing the apparent violation into one of four severity levels based on safety and regulatory significance. For cases where there is a potential for escalated enforcement action, that is, where the severity level of the apparent violation is categorized at Severity Level I, II, or III, a predecisional enforcement conference is held.

There are three primary enforcement sanctions available to the NRC and they are Notices of Violation, civil penalties, and orders. Notices of Violation and civil penalties are issued based on identified violations. Orders may be issued for violations, or, in the absence of a violation, because of a significant public health or safety issue.

This predecisional enforcement conference is essentially the last step of the inspection or investigation process before the staff makes its final enforcement decision.

The purpose of this conference is not to negotiate a sanction. Our purpose here today is to obtain information that will assist us in determining the appropriate enforcement action, such as: (1) a common understanding of the facts, root causes and missed opportunities associated with the violations, (2) a common understanding of corrective action taken or planned, and (3) a common understanding of the significance of issues and the need for lasting comprehensive action.

The apparent violations discussed at this conference are subject to further review and they may be subject to change prior to any resulting enforcement action. It is important to note that the decision to conduct this conference does not mean that NRC has determined that a violation has occurred or that enforcement action will be taken.

I should also note at this time that statement of views or the expression of opinion made by the NRC staff at this conference, *or the lack thereof*, are not intended to represent final determinations or beliefs.

Following the conference, the Regional Administrator in conjunction with the NRC Office of Enforcement and other NRC Headquarters offices will reach an enforcement decision. This process should take about four weeks to accomplish.

Predecisional enforcement conferences are normally closed to the public as is this conference. However, the Commission implemented a trial program in July 1992 to allow certain enforcement conferences to be open for public observation. [July 10, 1992 - *Federal Register*]
This trial program was recently extended for additional evaluation.

Finally, if the final enforcement action involves a proposed civil penalty or an order, the NRC will issue a press release 24 hours after the enforcement action is issued.

SUMMARY OF THE ISSUE

(L. Reyes)

Issues: 50.59 Safety Evaluations and Configuration Management
Process

This is a Predecisional Enforcement Conference to discuss apparent violations in two areas; conformance with 10 CFR 50.59 and configuration management. Four apparent violations were identified in the area of 10 CFR 50.59 evaluations. Five examples of one apparent violation were also noted in the area of configuration management.

The apparent 10 CFR 50.59 violations are of concern because they indicate that weaknesses exist in both recognizing the need for safety evaluations and in the process applied in assessing the impact of changes upon the plant.

The apparent violation in the area of configuration management is of concern because it indicates that deficiencies have existed in configuration management processes which have manifested

themselves in failures to ensure that the design of the plant was properly incorporated into plant procedures and, to a lesser degree, drawings. No plant event has been tied to the inaccuracies thus far identified; however, we are concerned about the potential extent of these conditions.

STATEMENT OF CONCERNS / APPARENT VIOLATION

(J. Jaudon)

Issue: Configuration Management

Several examples of failures to incorporate design changes or constraints properly into plant procedures and drawings were identified.

Defect:

The apparent violation included five examples :

- 1) One licensee-identified example of a failure to update an operating procedure to include operational limitations on the commencement of a full core offload. The limitations were imposed by a Plant Change/Modification which included a spent fuel pool heat load calculation.
- 2) One example of a failure to update an annunciator response summary when a hydrazine tank low level alarm setpoint was changed via Plant Change/Modification.

- 3) One example of a failure to update an engineering drawing to reflect the deletion, via Plant Change/Modification, of valves and piping for Intake Cooling Water System Pump Lubrication.

- 4) One example of a failure to update an annunciator response summary to reflect a change, made via Plant Change/Modification, which removed automatic and control room operation capability from a pair of Intake Cooling Water valves.

- 5) One example of a failure to update an annunciator response procedure to reflect a change, made via Plant Change/Modification, which removed the alarm function when placing Atmospheric Steam Dump Valve Selector Switches in manual.

The apparent violation identified above has been determined to be similar to annunciator response summary deficiencies identified in previous inspection reports. As a result, we are concerned that the

extent of condition of configuration management deficiencies may not yet be known.

Consequences:

The failures to update annunciator response procedures and drawings following design change implementation resulted in providing inaccurate or misleading information to control room operators. In the case of not properly incorporating the spent fuel pool heat load calculation into operational procedure limitations, a full core off-load was commenced without verifying or establishing appropriate parameters.

STATEMENT OF CONCERNS / APPARENT VIOLATION

(J. Jaudon)

Issue: 50.59 Safety Evaluations

Several safety evaluations or issues which potentially required safety evaluations were found. Problems were identified with four of the items reviewed. The items of concern spanned the areas of whether changes were properly considered for applicability under 10 CFR 50.59, the adequacy of 50.59 screenings, and conclusions reached during 50.59 evaluations.

The four apparent violations, and their associated consequences, are as follows.

- 1) A failure to perform a safety evaluation for the construction of the Unit 2 Control Element Drive Mechanism Control System room was identified. The room had been constructed during the preoperational test phase of the unit and this failure was identified in June 1996.

Upon conducting an evaluation of the room, it was identified that modifications to supports and restraints for non-safety-related components were required to ensure that the subject components did not adversely affect safety-related components during a seismic event.

- 2) A failure to identify that the installation of a temporary fire pump represented a change to the plant as described in the UFSAR was identified. The gasoline-powered pump was installed as a replacement for an electrically driven pump, and this change resulted in a change to the P&ID for the fire protection system provided in the UFSAR and the pump's capacity was lower than that for the pump it replaced.

The consequences of this action were that a safety evaluation of the proposed alteration's impact on an operable plant system was not performed.

- 3) The 10 CFR 50.59 screening process failed to identify that refueling machine underload and overload setpoints were

included in the UFSAR. This led to a failure to perform a required safety evaluation.

The consequences of this failure were minimal, in that the licensee's Facility Review Group identified the failure in the screening process as a function of their activities prior to recommending approval.

- 4) An example of a failure to recognize an unreviewed safety question was identified. In making a valve lineup change to the emergency diesel general fuel oil transfer system, reliance on operator action replaced automatic action and introduced new failure modes to the emergency diesel generator. This increased the probability of malfunction of a component important to safety.

As a consequence of making the change without recognizing the increased probability of failure, prior NRC approval was not obtained for the change in question.

Our findings are documented in NRC Inspection Report 50-335, 389/96-12, which were transmitted to you on July 26, 1996. At this conference, we are affording you the opportunity to provide information relative to:

- Any errors the inspection reports

- The severity of the violations

- Any escalation or mitigation considerations

- Any other application of the Enforcement Policy relevant to this issue.

ISSUE TO BE DISCUSSED

10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," Criterion III requires, in part, that measures be established to assure that applicable regulatory requirements and the design basis for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions.

1. The licensee failed to incorporate the prerequisite conditions contained in PC/M 054-196, supplement 0, "St. Lucie Unit 1 Cycle 14 Reload," into OP 1-1600023, "Refueling Sequencing Guidelines." As a result, requirements for the operation of two Spent Fuel Pool Cooling Pumps, maximum initial Spent Fuel Pool temperature, minimum time since shutdown, minimum Component Cooling Water system flow to the Spent Fuel Pool heat exchangers, and operability of control room annunciation were not verified prior to the initiation of fuel offload.
2. PC/M 109-294 [Setpoint change to the Hydrazine Low Level Alarm (LIS-07-9)] was completed without assuring that affected procedure ONOP 2-0030131, "Plant Annunciator Summary," was revised. This resulted in annunciator S-10, "HYDRAZINE TK LEVEL LO," showing an incorrect setpoint of 35.5 inches in the procedure.
3. During implementation of PC/M 341-192 [ICW Lube Water Piping Removal and CW Lube Water Piping Renovation], the as-built Dwg. No. JPN-341-192-008 was not incorporated in Dwg. No. 8770-G-082, "Flow Diagram Circulating and Intake Cooling Water System," Rev 11, sheet 2 issued May 9, 1995 for PC/M 341-192. This resulted in Dwg. No 8770-G-082 erroneously showing valves I-FCV-21-3A & 3B and associated piping still installed.

4. PC/M 268-292 [ICW Lube Water Piping Removal and CW Lube Water Piping Renovation] was completed without assuring that affected procedure ONOP 2-0030131, "Plant Annunciator Summary," was revised. This resulted in annunciator E-16, "CIRC WTR PP LUBE WTR SPLY BACKUP IN SERVICE," incorrectly requiring operators verify the position of valves MV-21-4A & 4B following a SIAS signal using control room indication. These valves no longer received a SIAS signal, were deenergized and had no control room position indication.
5. PC/M 275-290 [FIS-14-6 Low Flow Alarm and "Manual" Annunciator Deletions] was completed without assuring that affected procedure ONOP 2-0030131, "Plant Annunciator Summary," was revised. This resulted in safety-related annunciators LA-12, "ATM STM DUMP MV-08-18A/18B OVERLOAD/SS ISOL," and LB-12, "ATM STM DUMP MV-08-19A/19B OVERLOAD/SS ISOL," incorrectly requiring operators to check Auto/Manual switch or switches for the MANUAL position. The relay contacts which energized these annunciators based on switch position were removed to eliminate nuisance alarms.

NOTE: The apparent violations discussed in this predecisional enforcement conference are subject to further review and are subject to change prior to any resulting enforcement decision.

ISSUE TO BE DISCUSSED

10 CFR 50.59, "Changes, Tests and Experiments," stated, in part, that a licensee may make changes in the facility as described in the safety analysis report without prior Commission approval, unless the proposed change involves an unreviewed safety question, and that the licensee shall maintain records of changes in the facility.

1. The licensee erected an enclosure around the Control Element Drive Mechanism Control System during the Unit 2 preoperational test phase without performing a safety evaluation. This non-safety related structure was erected in a safety related cable spread room.
2. During the 1996 Unit 1 refueling outage the licensee installed a temporary 750 gpm fire pump arranged to take suction from fire protection water tank 1B and discharge into the fire protection water system via fire hydrant No. 12 without performing the required safety evaluation.
3. The licensee used an engineering evaluation to change the set points and procedures described in the FSAR for operating the fuel hoist without performing a 10 CFR 50.59 safety analysis/evaluation.
4. The licensee made a change to the facility which involved an unreviewed safety question when the 2B Emergency Diesel Generator fuel oil line from the fuel oil tank to the day tank was manually isolated to secure a through-wall fuel oil leak. In taking the action, the licensee introduced two failure modes into the 2B Emergency Diesel Generator, which necessarily increased the probability of occurrence of a malfunction of the Emergency Diesel Generator above that previously evaluated in the safety evaluation report, resulting in an unreviewed safety question.

NOTE: The apparent violations discussed in this predecisional enforcement conference are subject to further review and are subject to change prior to any resulting enforcement decision.

CLOSING REMARKS

(L. Reyes)

In closing this predecisional enforcement conference, I remind the Licensee of two things:

First, the apparent violations discussed at this predecisional enforcement conference are subject to further review and may be subject to change prior to any resulting enforcement action.

Second, the statements of views or expressions of opinion made by NRC employees at this predecisional enforcement conference, or the lack thereof, are not intended to represent final agency determinations or beliefs.