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 AUTH. NAME AUTHORITY AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 GRACE, J. N. Region 2, Office of Director

SUBJECT: Forwards comments on NRC SALP. Efforts underway to improve communication both within operations & between operations & other plant & staff depts. Beepers being carried by key mgt & maint supervisors.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W.
Atlanta, GA 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Systematic Assessment of Licensee Performance

Florida Power & Light Company (FPL) has reviewed your letter dated July 17, 1987 forwarding the NRC Systematic Assessment of Licensee Performance (SALP) for Turkey Point Units 3 and 4. FPL does not take exception with the ratings in the report, however, we do want to provide our comments on particular sections. These comments are provided in an attachment to this letter.

Since the conception of the Performance Enhancement Program (PEP), considerable management and monetary resources have been expended to establish a system for ensuring the safe, consistent, high quality performance of all equipment and personnel involved in the operation of the Turkey Point Units. These program improvements are largely in place and as reflected in the report there is general improvement in the over-all performance of the facility. Management efforts are being strongly focused on assuring that personnel perform to the consistent high standards expected by FPL and the NRC.

To assist in this effort, we have determined that it would be appropriate to conduct a management study and examination of our improvement effort with special focus on the cultural and attitudinal aspects of the Turkey Point operations. We have used this technique within our company in the past to successfully overview the effectiveness of improvement efforts and to identify areas where additional efforts are warranted. We are in the process of selecting the organization to perform this review. Additional details of the scope and schedule of the review will be presented to NRC management on September 25, 1987 at the Region II offices.

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U. S. Nuclear Regulatory Commission
L-87-392
Page two

Beginning during the next several months and continuing for the immediate future, management attention will be concentrated heavily on promoting a philosophy of quality and accountability at all levels of the Turkey Point work force. As briefly mentioned in section VI.1 of the SALP, FPL is currently providing special training to Turkey Point personnel. The plant manager and site vice president are actively involved in this effort to raise employee awareness and accountability for achieving the overall plant and corporate goals and expectations. The training is directed at promoting team involvement and dedication which are fundamental organizational objectives. It is FPL's goal to have all appropriate Turkey Point employees trained in this program by the end of the year.

In addition, to ensure management's goals and expectations are being adequately conveyed to all levels of plant staffing, a three-phase Management on Shift Program has been established to observe and assess the effectiveness of communication and application of these goals and expectations with respect to non-licensed operators, licensed operators, and maintenance personnel. This program is outlined in more detail in the operations section of the attachment to this letter. Its overall objective is to help assure measurable results from FPL's efforts in the form of overall plant performance improvements by the end of this year.

In sum, the programs created as part of PEP are essentially complete. Management attention is currently being focused on the details of program implementation and upgrading the performance of personnel. These efforts should result in continued improvement in plant operation.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/SDF/gp

Attachment



ATTACHMENT

RE: TURKEY POINT UNITS 3 & 4
DOCKET NOS. 50-250 AND 50-251
SPECIFIC COMMENTS ON NRC
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)

A. PLANT OPERATIONS

FPL concurs with the SALP analysis in this section. As the SALP reflects, a tremendous amount of effort and expense has been expended in improving the operation of Turkey Point Units 3 and 4.

Coincident with our Performance Enhancement Program (PEP), a large number of backfit modifications have been completed, most notably a standby steam generator feedwater system, control rod split pin replacement, spent fuel pool rerack for Unit 3, vital AC instrument inverter replacement, enhancements to the nitrogen supply to the auxiliary feedwater control valves, post TMI accident monitoring instrumentation and 10 CFR 50 Appendix R fire protection modifications for Unit 3. These improvements and a total of approximately 300 other plant changes and modifications during this three year period have necessitated an extraordinary effort on the part of the plant staff to assimilate these changes and simultaneously upgrade the level of operational performance.

As noted in the report, significant progress has been made in improving the material condition of the plant, particularly the primary systems. This, in turn, has improved overall plant operation. The same effort to improve material conditions is underway on the secondary side of the plant. FPL's Quality Improvement Program, which stresses the concept of Operations as the "customer" for all plant support groups, is being used to pinpoint and correct deficiencies. Daily meetings, shift briefings, and analysis to determine the root cause of problems continue to play an important role in improving overall plant operations.

Efforts are underway to improve communication both within operations and between operations and other plant and staff departments. Proper communication is being emphasized to the operators at simulator training and during pre-evolution shift briefings. The public address (PA) system is undergoing preventive maintenance and will soon be modified to have boost capabilities from the control room. Dedicated radios are available for operations exclusive use. Beepers are now being carried by key management and maintenance supervisors.

Operational staffing requirements are difficult to forecast with precision. Turkey Point has initiated a comprehensive plan based on prior and anticipated attrition rates to facilitate staffing over the long term. A large staffing increase in the entry level position of associate nuclear plant operator (ANPO) has been approved. This increase, when coupled with our career path program for operators, which provides for advancement at a prescribed rate based on experience and qualification, will provide sufficient personnel to maintain licensed operator staffing at a sufficient level to minimize overtime. In the short term, FPL has issued strict guidelines designed to manage and reduce overtime.

Continued emphasis on procedural compliance has resulted in improved control of plant operations and fewer personnel errors. The events involving nitrogen intrusion into the boric acid system and the isolation of the nitrogen supply to the auxiliary feedwater control valves have caused a great deal of concern to operations management as a number of plant procedures and policies were not adhered to. Recognizing that operations is not meeting the consistent high standards that are expected, Turkey Point management has taken the initiative of providing additional field supervisory coverage through the Management on Shift Program.

Under the Management on Shift Program, two additional Turkey Point management personnel are assigned to backshift, from 10:00 P.M. to 7:30 A.M. seven days a week, to provide additional supervisory support. The two-man team will consist of one member who has a current or prior senior reactor operator (SRO) license or SRO certification. The overall objective of this program is to ensure that management's goals and expectations are being communicated to non-licensed operator, licensed operator, and maintenance personnel and are being reflected in the proper use of procedures, appropriate concerns for safety systems, and proper interface and communication with both internal and external departments. The program is also intended to identify opportunities for improvement in the utilization of personnel, procedures and reference material, communication, and the optimization of the number of activities being undertaken.

The program will be accomplished in three phases, although some are likely to overlap. The first phase consists of approximately three months of on-shift observation, accompanied by recommendations for immediate improvements. In the second phase, scheduled to start October 1, 1987, data and information gathered during the first phase will be compiled and organized for study. During the third phase, data and information will be analyzed to identify root causes of deficiencies. Corrective actions will then be developed and implemented, to augment the immediate improvements made as part of phase one. Performance indicators, including the number of technical specification violations that occur during Phase I, number of procedure changes and on the spot procedure changes resulting from this effort, have been established to monitor the effectiveness of the program as it proceeds. Also as part of Phase I, a baseline list of equipment problems from observation will be developed. Management attention will be directed to correct these items. Progress in correcting these items will be tracked. The program, itself, is specifically designed to yield results in the short-term, while providing the information necessary for developing long-term goals and means for achieving them.

B. RADIOLOGICAL CONTROLS

FPL concurs in general with the SALP rating for this functional area. Continued procedure upgrades, personnel training, and facilities improvements which are planned during the next year should result in notable improvements.

Management support of the plant chemistry improvement programs is evident in the recent funding and installation of interim on-line monitoring equipment for secondary chemistry sampling. A permanent system along with other laboratory enhancements are scheduled in the integrated schedule, but to aid in the support of the immediate needs, these interim facilities were provided. Chemistry staffing is much improved and training of all current and new personnel has been reestablished.

In the area of health physics, continued efforts in procedure upgrades and personnel training should result in improvements in the posting of workers instructions and in the uniform performance of many of the routine health physics operations. With the continued management support and involvement in preoutage planning and the ALARA program, person-REM dosage levels will be maintained at the lowest reasonable level.

Through continued management support and increased personnel training, an improving trend is anticipated in this area over the next year.

C. MAINTENANCE

As noted in the SALP significant management attention and resources have been applied to this functional area during the recently concluded SALP period. FPL agrees with the rating and need for continued management attention to maintain and improve performance in this area.

As noted in the report the Plant Work Order (PWO) backlog has at times become very large in the I & C area. Through the use of contractors and the return of the I & C Department staffing to full compliment, this backlog has been reduced and is now being maintained within the INPO guidelines. A report of PWO status is issued at the daily morning plant management meeting and is closely reviewed by the maintenance superintendent for unsatisfactory trends. This report lists the total number of open PWOs and then separates this number into those on hold for material or proper plant operating conditions and the number by maintenance group which are ready to be worked. Control limits will be established which initiate countermeasures to bring the indicator back under control. The routine monitoring of this report will allow for the observation of an upward trend in the backlog and redistribution of resources prior to this backlog approaching the levels experienced in the past.

Inconsistencies in the PWO prioritization system was the subject of a project recently undertaken by a Turkey Point Quality Improvement Team. Team members presented their results at the SALP meeting recently held at Turkey Point. As presented at that meeting, this team analyzed a large number of open PWOs and determined that the root cause of the problem was unclear direction to and training of the users of the PWO system as to the criteria to be used when assigning a priority to a PWO. The team created a series of yes/no questions, which when answered, results in the assignment of the appropriate priority to a PWO. The trial implementation of this team's suggestion has just recently concluded. Based on data obtained and experience with the trial implementation program, a significant reduction in the number of jobs classified in the top priority or immediate attention categories will occur. The dramatic effect of this is to rationalize the work planning process so that concentrated attention can be applied to the true top priority work and appropriate preparation, planning and supervision can be allocated. The result is that the likelihood of completing a job when started, avoiding delays in the course of the work, and improving the quality of the work performed (reducing rework) are all enhanced. After complete analysis of the results and resolution of any problems experienced in the trial implementation phase the team's recommendations will be made a part of the permanent plant PWO process and procedures.

The SALP also discussed several repetitive maintenance problems that had been experienced during the past review year. These problem areas had all been previously brought to the attention of management and, for most of the equipment problems identified in the report, a root cause has already been determined and the proper corrective actions are either implemented or scheduled for implementation by early 1988. The trending of Licensee Event Reports (LER) and the time in and the reason for entering Limiting Condition of Operation (LCO) has been utilized on a limited basis in the past by maintenance to aid in the detection



of repetitive equipment problems. The planned increase in the trending of the above parameters in conjunction with the recently implemented Analytical Based Preventive Maintenance Program should help significantly in the detection and reduction of repetitive equipment maintenance problems.

In conclusion, while some improvements have been experienced in this area in the last year, continued management attention will be applied in the area of maintenance and continuing improvement is anticipated.

G. SECURITY AND SAFEGUARDS

The area of security and safeguards has become and will continue to be the subject of intensified management attention. As noted in the SALP, personnel changes in the positions of site security supervisor and chief of uniformed security were made late in the recently concluded SALP period. These changes in conjunction with the additional staffing, program, and facility improvements that are planned to occur during the current SALP period, should result in continuing improved performance in this area.

Several projects have been undertaken at Turkey Point which are aimed at the self identification and correction of potential weaknesses in the areas of plan and program implementation, management awareness, and general attention to detail. Specifically, two independent, in-depth program evaluations are currently underway or complete. One, which has just been completed, was performed by the FPL Quality Assurance Department and plant management has received the report from this evaluation. The other is being accomplished through routine meetings of the joint FPL and contractor corporate security staff with the goal of improving overall guard force training and performance. As a direct result of this team's recommendation a two day training session of all security contractor supervisors has been conducted to enhance knowledge of the security plan requirements. Additional training on the new regulations is being scheduled. This program was discussed in greater detail in our response to Enforcement Action (EA) 87-40 and the presentation made to your staff on July 30, 1987, at our Turkey Point facility.

Several facilities upgrades are planned. A new security operations center is presently under construction. This facility will provide a centralized location for the security shift supervisors, contractor shift supervisor, and shift briefings. The contractor personnel entrance gate will be enclosed and air conditioned to improve the equipment reliability. X-ray machines for package processing will also be installed. A permanent vehicle entrapment area will be constructed at the south vehicle entrance gate to provide an isolated area to better facilitate vehicle searches. Vehicle searches by dogs, with security personnel, will also be expanded to 24 hours, 7 days a week.

The SALP raised concerns as to the maintenance and reliability of the security computer and FPL's heavy reliance on compensatory measures for both computer down periods and in the area of vital barriers and perimeter fencing. The replacement of the computer system and modifications to the vital barriers and perimeter fencing is currently in the Integrated Schedule. These modifications are currently under review to determine if schedule improvements are possible, but as a temporary measure the dedicated maintenance staff for security equipment has been increased to three technicians and work with the vendor to improve the spare parts availability has commenced. It is anticipated that the enlarged maintenance staff and better availability of replacement parts will reduce the computer down time thus reducing the dependency on compensatory measures.

In the area of additional staff, FPL is in the process of approving additional FPL positions within the Turkey Point security group which will allow for the creation of round-the-clock, seven-day-a-week FPL supervision of the contractor security guard force. This should result in a significant improvement in the communication of security issues to FPL management. Problems in communication have been a noted weakness in the past and an area of concern.

Enhancements to the security irregular event reporting program which were discussed in the FPL response to EA 87-40 will better facilitate the trending of recurring security weaknesses. These weaknesses can then be brought to management attention, as necessary, and corrective actions taken to prevent further recurrences in a more timely fashion than had previously been achievable. Also to reduce the possibility of weaknesses in the implementation of the security program, we committed in our response to EA 87-98 to perform a more detailed review of all security procedure changes by joint plant and corporate security personnel prior to implementation to better ensure compliance with the intent of the security plan. These changes in conjunction with personnel changes and additions should greatly improve the communication of security concerns to management.

In conclusion, the area of security and safeguards has become the subject of intensified attention and self-assessment. Many improvements have already been made and others are being pursued. The aim is to improve the overall effectiveness of the Turkey Point Security Program to meet the standards of excellence required by FPL and expected by the NRC.

H. OUTAGES

Increased management attention has been focused in the area of pre-evolution planning. The use of morning and afternoon planning meetings and short notice outage work planning meetings have been either initiated or increased. These routinely scheduled meetings are designed to bring together the proper personnel and management so that decisions can be made and schedules produced for the activities that will be occurring in the next 24 to 48 hours. These planning sessions in conjunction with actual pre-evolution briefings, are helping maintenance coordinate their clearance and equipment line-up needs with operations in advance of the planned evolution start time, thus reducing delays and needless rescheduling of work. It is also anticipated that these planning meetings will prevent the recurrence of incidents such as occurred on August 9, 1986, when two departments were not aware of the work being performed by the other which resulted needlessly in a unit trip.

In connection with the matter of management attention, the following observation should be made with respect to the comment contained in the SALP concerning management involvement in the EDG load sequencer testing. The initial wiring errors were detected as a result of the plant manager's request to verify certain as found conditions. Once these errors were detected, the plant manager required a comprehensive wire-by-wire check of all four sequencers. Our plant and engineering staffs developed the testing required to validate the sequencers' operation. The testing plan was reviewed with NRC region and resident personnel. Following resolution of all concerns, a sequencer test team was formed to develop and supervise the test. The operations superintendent provided input to this team and was present in the control room for the initial test. It is our judgement that management involvement in EDG load sequencer testing was demonstrated by operations superintendent support of and input to the sequencer test team. This management involvement contributed to the performance of a comprehensive and technically competent test.

Management will continue its efforts to support careful pre-planning of all major work evolutions. However, even with the most careful planning unforeseen work activities will occur. When such events occur appropriate changes in the schedule must be made. It is corporate managements position that the correct question to ask the plant is not "How soon can you get the unit back on-line?", but rather "Is the unit safe and ready to return to reliable operation?". The continued high quality and safe operation of the Turkey Point Units will always be of the foremost importance.

K. TRAINING AND QUALIFICATION EFFECTIVENESS

In general, FPL concurs with the overall direction of the analysis and the conclusions in the report for this functional area. Many initiatives are now underway to support the immediate needs until the effects of the long term corrective actions are fully realized.

The SALP concentrated largely on weakness in the staff size and qualification for the licensed operator training program. Nine permanent positions currently exist for licensed operator training instructors. All of these instructor positions will be filled with actively licensed personnel. Two of the current instructors are presently enrolled in the senior reactor operator (SRO) upgrade class which is due to be completed January 1988 and the third and fourth instructors are scheduled to participate in the next SRO upgrade class which should begin in January 1988. Another instructor is enrolled in the current hot licensed reactor operator class which should be completed during the fourth quarter of 1988. The sixth position is held by a currently licensed individual. The three department vacancies are scheduled to be filled as qualified applicants become available.

As an interim measure until the results of the upgraded training of the permanent instructors can be fully realized, the controlled use of contractor instructors is required. Temporary instructors who are providing licensed operator training have all received site specific systems training. They will not be used to teach Turkey Point specific integrated systems. The permanent instructors will be returned to instructor status upon satisfactory completion of their upgrade training. The return of these instructors to permanent staff will eliminate the current use of contractor personnel in the area of licensed operator training.

As the operator training instructors complete their operator upgrade training they will begin a simulator instructor training program in which the necessary skills to properly teach, coach, evaluate, and critique operator performance in the simulator will be taught. This training program has been developed using job task analysis and the systems approach to training. In the area of simulator curriculum development a comprehensive database management system has been developed to assist the instructor in designing simulator exercises. The database links plant job and task analysis (JTA) data with INPO JTA data, NRC Knowledges and Abilities (NUREG 1122), plant Licensee Event Reports (LERs), INPO Significant Event Reports (SERs), INPO Significant Operating Event Reports (SOERs), INPO Nuclear Plant Reliability Data System (NPRDS), NRC Information Notices (IENs), and plant emergency and off-normal operating procedures. The importance of this database is that it allows the instructor to incorporate plant and industry experience into appropriate simulator scenarios on a timely basis.

The start-up and operation of the Turkey Point simulator in early 1988, will essentially complete the massive addition to the physical facilities associated with training. The onsite availability of this state of the art simulator, which precisely replicates both control room arrangement and unit dynamic response, will clearly be a major step change improvement in critical training assets. The ready access to this simulator combined with the completion of technical and simulator instructor training by the licensed operator instructors, will provide highly qualified simulator instructors by the end of 1988. These instructors will have daily opportunities to hone their skills after completing the training programs.

Deficiencies have been noted in the records and reference material retrieval area of the operator training program. A computer database called Training Information Management System (TRIMS) is being developed to aid in the management and retrieval of training records. TRIMS will provide tracking of training commitments, personnel qualification data, training program attendance information, operator requalification due dates, and provide an exam question database. To assist in the reduction of the backlog in records storage contract personnel have been hired. It is anticipated that, once this backlog is reduced, the normal staffing will be sufficient to maintain an accurate and up to date records retrieval system without the dependence on this additional contractor support.

To better manage the required reading aspects of the operator requalification program, changes have been made to reduce the volume of material required to be read and to increase availability of the material to be read and the time to read it. Details of these changes were provided in FPL Letter L-87-357 dated August 27, 1987.

In conclusion, the weaknesses identified in the SALP in the area of operator training continue to be an area of close management attention. Many initiatives to improve Turkey Point's performance in this area are well underway and positive results will be apparent on an ongoing basis as the improvements described are implemented.

L. ENGINEERING SUPPORT

FPL has carefully evaluated the data, supporting evidence and conclusions in the SALP pertaining to the Engineering Support area. We appreciate the NRC's recognition of improvements which have been made in this functional area. However we recognize, too, that there are additional opportunities for improvement. In this regard initiatives being undertaken are discussed below.

As indicated in the SALP Report, the rating of Engineering Support was largely determined by the effectiveness of corrective actions taken in response to Enforcement Action EA 86-20 (related to the 1985 Safety System Functional Inspection). While FPL was generally credited in the report for its proper and effective implementation of these corrective actions, the NRC noted certain continued deficiencies, focusing on the recent conoseal leak incident. FPL has submitted a detailed response dated August 20, 1987 to the Notice of Violation issued in connection with the conoseal leak.

With respect to engineering support and EA 86-20, corrective actions identified and initiated by FPL, which were presented in FPL Letter L-86-389 dated October 1, 1986 included:

1. Phase II Select Systems Safety Review
2. Standard Engineering Design Package Implementation
3. Reorganization of the Engineering Function and increased staffing to include new management position and improved engineering coordination
4. Training of technical personnel

Each of the four corrective actions has been subsequently investigated by the NRC and has been found to be properly supported by FPL management. FPL's own review indicates that the corrective actions are achieving the desired results.

With respect to the SALP, a point of clarification should be noted concerning the Site Engineering Manager's role. This position provides central accountability functions. Thus, this position provides a single point of contact for the plant to obtain engineering support, thereby improving overall engineering coordination and effectiveness.

As an additional point of clarification, it was stated in the SALP that an NRC inspection revealed approximately 525 open Requests for Engineering Assistance (REAs) with many being over one year old. The volume of REAs alone is not indicative of negative engineering performance. In fact, as stated in the SALP, the volume of REAs was attributable at least in part to the confidence placed in Engineering by various plant groups, and the extensive plant modifications being made. It should be noted that a direct result of our Select System Review is increased REAs, and subsequent studies and modifications. This review has been acknowledged on numerous occasions as a positive and effective program. Further, the SALP states that a high percentage of the open REAs were one or more years old and had not been the object of any action or review. In fact, all REAs have undergone review within the past year in conjunction with the development of the Integrated Schedule (I/S). During that process, numerous REAs were cancelled or superseded, with those remaining being prioritized and scheduled in accordance with I/S procedures and policies that focus on priority for

continued operational safety and quality. Thus, REAs are being actively managed to assure that any backlog does not interfere with satisfactory plant performance.

With respect to staffing levels, an increase in Engineering staff (as well as a Technical staff increase) has reduced the number of systems assigned to each engineer and increased the level of attention to design control with respect to each individual plant system. Management has approved sixteen new design engineering requisitions for permanent personnel to be hired during 1987.

