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AUTH. NAME AUTHOR AFFILIATION
WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Informs of immediate short-term & long-term corrective measures being taken by util re performance problems discussed during 870925 meeting. On 870926 Vice president met w/mgt team to discuss 870925 meeting.

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FPL

October 7, 1987
L-87-400

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Immediate, Short-Term and
Long-Term Corrective Measures

The purpose of this letter is to inform you of immediate, short-term and long-term corrective measures which Florida Power & Light Company (FPL) is taking to address the performance problems discussed during our meeting on September 25, 1987, and the more general matter of FPL's ability to identify and resolve issues at Turkey Point.

The following corrective actions have already been taken or are being taken:

- On Saturday, September 26, 1987, the Turkey Point Nuclear Plant Site Vice President met with his management team (managers and department heads) at the facility to discuss the September 25, 1987 meeting with the NRC and to communicate his expectations and standards of performance which must be achieved and maintained at Turkey Point. In attendance at this meeting were the FPL President, the Group Vice President Nuclear Energy Department and the Vice President Nuclear Operations.

- On Saturday, September 26, 1987, the Turkey Point Site Vice President met with approximately 600 of the 670 personnel work force during three separate meetings to discuss the September 25, 1987 meeting with the NRC and to communicate his expectations and standards of performance which must be achieved and maintained at Turkey Point. The FPL President, the Group Vice President Nuclear Energy Department and the Vice President of Nuclear Operations were in attendance at these three meetings. Briefing of the approximately 70 personnel who did not attend any of these three meetings is now being done and will be completed by October 15, 1987.

- Additional work crew briefing practices have been initiated and will remain in effect until the Site Vice President determines that these additional measures are no longer necessary. The Site Vice President has issued a memorandum to the foremen/supervisors requiring that they, at the beginning of each shift, brief all work crews on the activities to be performed during the shift, any precautions that are necessary, and the overall performance expectations. At the end of each shift, critiques are being performed to identify problems that may have been encountered during the shift, proposed solutions, and issues that need higher management attention.

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- The St. Lucie Plant Site Vice President has been assigned to Turkey Point for one day each week to provide supplemental support to the Turkey Point Site Vice President and to help identify weaknesses that exist at Turkey Point.

- On August 14, 1987, a Management on Shift program was implemented at Turkey Point to monitor plant activities on back shifts. The program consisted of ten 2-man teams with management and SRO experience to monitor operations, plant support activities and interfaces. The teams, which report to the plant manager, observe, coach, and provide management guidance.

  A guidance document has been issued which identifies the purpose of the program, the responsibilities of the personnel assigned to the program, reporting requirements, and the authority given to the teams to act where necessary to prevent personnel error and to assure quality performance. The teams were to complete the monitoring activities and recommend short-term countermeasures in early October 1987. However, in order to enhance overall performance monitoring, the Management on Shift program will be continued until corrective actions for problems identified from observations are implemented, and changes and upgrades in operational management are accomplished. In addition, five St. Lucie Plant personnel and one Nuclear Energy staff engineer have been assigned to the Turkey Point Management on Shift program to supplement the existing teams. These additional personnel are being integrated with the twenty other personnel in the program. They will have received instruction on the guidance document and they will understand their accountabilities, their authority, and the requirements of the program prior to performing their on-shift duties.

- The Turkey Point Site Vice President is meeting with each of the operating crews to communicate performance expectations and consequences for failure to perform as expected. These meetings are planned to be completed by October 15, 1987.

- The site Quality Assurance organization will continue their augmented QA performance monitoring on shift, which focuses on performance based monitoring of plant activities. The functional areas receiving the most attention are operations, maintenance, procedures, and surveillance and test control. The QA performance monitoring program is delineated in Quality Instruction QI 18 QAD 4 which identifies the purpose of the program, the responsibilities of the personnel assigned to the program, reporting requirements, and handling of identified discrepancies. A surveillance guide, listing twenty-seven characteristics relating to control room activities, is utilized by the QA performance monitoring personnel. These on-shift performance monitoring personnel report to the site QA superintendent and are completely independent of the management on shift personnel previously discussed.

In the longer term, FPL will initiate a third party evaluation by an independent consultant to identify the root causes of continuing performance problems at Turkey Point, and to make recommendations in the areas of corporate and plant management, organization, personnel performance and competency, and teamwork that will assist FPL in accelerating improvement in performance at Turkey Point.

The evaluation will include, but not be limited to, organization, management and management controls, staffing levels, communications methods and effectiveness, improvement programs, operational practices, safety review committees, personnel performance, attitude and culture and disciplinary practices. The evaluation will cover all levels of corporate and plant personnel, and it will examine the recurring problems at Turkey Point and the differences in performance at St. Lucie and Turkey Point.

FPL believes that the value of this evaluation is critically dependent on the experience of the individuals performing the evaluation and their understanding of the standards of excellence required in the nuclear industry. FPL will provide the necessary liaison to facilitate the work of the consultant and to monitor scheduled milestones.

The final report, as well as interim findings, will be communicated to a senior-level review board consisting of the FPL Chairman and Chief Executive Officer, the President and Chief Operating Officer, and the Group Vice President Nuclear Energy Department.

FPL is preparing a solicitation for proposals to conduct the evaluation, has identified potential consultants, and expects to make a selection on or about November 1, 1987. Work will commence immediately thereafter. We would be pleased to discuss the proposed scope of the study with you before it is initiated. It is our intent to provide a thorough assessment which we believe can be completed by the end of April 1988. However, should the consultant we select be unable to complete the assessment by April 1988, we will inform the NRC.

FPL will evaluate the consultant's findings and recommendations as presented in the final report and will develop an action plan for corrective measures within 30 days of receipt of the final report. Of course, if the evaluation identifies matters which should be addressed immediately, FPL will respond in a timely fashion.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy Department

COW/RJS/bg:081

cc: Dr. J. Nelson Grace, Regional Administrator, Region II; USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant