



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 15, 1989

Docket Nos. 50-250
and 50-251

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Mr. J. H. Goldberg
Executive Vice President
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - PROCEDURES GENERATION PACKAGE - TMI ACTION PLAN ITEMS I.C.1.2 AND I.C.1.3 (TAC NOS. 44345 AND 44346)

This letter is to inform you that we are closing our review of the Turkey Point procedures generation package (PGP) which we are tracking as TMI Action Plan Items I.C.1.2 and I.C.1.3. The enclosed Safety Evaluation (SE) identifies a number of concerns which require your resolution. No further submittals are required except that you are requested to inform us when these actions have been fully implemented and you consider the matter closed. Future inspection activities will audit the resolution of the concerns and the implementation of the commitments made in the PGP.

As part of TMI Action Plan Items I.C.1.2 and I.C.1.3, licensees of operating reactors were required to upgrade their emergency operating procedures (EOPs). NRC guidance for upgrading plant procedures was issued in NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures." NUREG-0899 described the use of a PGP to prepare EOPs. Generic Letter 82-33, (Supplement 1 to NUREG-0737), required licensees to develop a PGP.

Your letter dated October 1, 1984, submitted the Turkey Point PGP for review. On May 8, 1987, the staff issued a Draft Safety Evaluation Report (DSER) which identified a number of items which needed to be addressed before the PGP was considered acceptable. Your responses to the DSER items were submitted in a letter dated July 24, 1987, along with draft revisions of the PGP. The staff review of these submittals is documented in the enclosed SE.

As indicated in Section 2 of the enclosed SE, concerns still remain which require resolution prior to the PGP being considered acceptable. Following is a summary of these concerns:

A. Plant-Specific Technical Guidelines

Confirmation is required that the control room instrumentation and EOPs are consistent with each other and that they adequately support the mitigative strategies of the emergency response guidelines.

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B. Writer's Guide

Concerns that require resolution are summarized as follows:

- 1. Revisions to guidance (7 concerns)
- 2. Format changes (3 concerns)
- 3. Editorial changes (13 concerns)

C. Verification and Validation Program

- 1. The validation program should specifically indicate the qualification and requirements of all personnel involved in the validation process and should include a description of the roles played by these persons.
- 2. The validation program should include a statement that all EOPs will be validated, either on the simulator or by walk-throughs.
- 3. The validation and verification program should describe how the program will account for differences between Units 3 and 4.

No open items remain for the EOP training program. The staff's review finds that the training program is acceptable and should result in appropriate training for the operators on the upgraded EOPs.

The Turkey Point PGP should be revised to address the concerns identified in Section 2 of the SE. For concerns contained in Section 2 of the SE which you feel are inappropriate for inclusion in the PGP, the justification should be documented and maintained. The revised PGP need not be submitted to the NRC. Instead, resolution of the concerns identified in the SE and compliance with commitments made in the PGP will be subject to future audits by the NRC. As no further technical submittals are required by you, TAC Nos. 44345 and 44346 and TMI Items I.C.1.2 and I.C.1.3 are closed.

Sincerely,

Original Signed By

Gordon E. Edison, Sr. Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

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