

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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U.S. Nuclear Regulatory Commission
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Washington, D. C. 20555

Re: Turkey Point

heavily involved in all aspects of the Dual Unit Outage, especially regarding restart and configuration control activities. Also, System Engineers have continued their focus on reducing Limiting Condition for Operation (LCO) hours. The twelve month rolling average of LCO Hours per Hour of Operation has been lowered from approximately 1.4 in early 1989 to .43 in December 1990 for Unit 3 and from 1.2 to .61 for the same period for Unit 4.

- Training. Examination results during this SALP period demonstrate that Turkey Point operator requalification training has significantly improved and that operator licensing training remains strong. During the February-March 1991 annual requalification exam series, the pass rate was 93.5% (44 of 47). The S

ATTACHMENT A

This Attachment summarizes the performance of FPL's Turkey Point Units 3 and 4 since the last NRC Systematic Assessment of Licensee Performance (SALP) evaluation period, which ended on July 31, 1990. The performance of Turkey Point is described for each functional area that was evaluated in the NRC SALP report issued on September 25, 1990 (Inspection Report Nos. 50/250/90-26 and 50/251/90-26). Unless otherwise noted, any page references in this Attachment are to that report. The descriptions in this Attachment of actions being taken or to be taken are based upon FPL's current plans and activities; some of these may change depending on future circumstances.

I PLANT OPERATIONS

o Increased Operations Staffing

The licensing of Group 13 provided 22 new SRO licenses for Operations; another 16 personnel are in licensed operator training and scheduled for the NRC examination in October 1991. On-shift non-licensed operator staffing has increased by 10 and currently there are 16 non-licensed operators in training. This staffing increase has allowed Operations to make the following improvements:

- Reduce overtime requirements from the 25 to 30% range frequently experienced in previous years to the current range of 5 to 10%.
- Transferred 3 experienced licensed operators to the Training Department which will assist both Training and Operations in achieving higher standards of performance. This will be discussed further in the training section.
- Formation of 6 operations shifts which in turn supports

critical tasks and improves his command and control ability during both normal and emergency situations. The NRC identified the radio system as a strength during the 1990 NRC evaluated emergency preparedness exercise.

o **Operations and Training Initiatives**

Operations has worked with and is supporting Training in developing and implementing the following training improvements and initiatives:

- New Equipment and Plant Modifications - This training was designed to provide instruction on how the new equipment works, how it is to be operated, and how it interfaces with existing systems. To facilitate the training, the simulator was upgraded to the new configuration so the normal and emergency operation of the equipment could be practiced prior to the equipment turnover for operation.
- Self-checking - This training was geared to provide the operator with

- Procedures
- Outstanding work orders
- Drawing update requirements
- Start-up Reports
- Fire protection requirements
- Non-conformance reviews
- Audit completions

o Daily Schedule

The Plan of the Day (POD) has been expanded to a 5 day look ahead for all departments. This has given the entire plant a standard 5 day rolling schedule enabling departments requiring support to cross check and ensure supporting departments have the job scheduled at the proper time.

A quarterly schedule is currently being developed to be implemented by January

- ALARA review completion
- Pre-fabrication work
- Manpower requirements
- ManRem estimates
- Clearance requirements/written
- Staging of equipment/parts
- Vendor support
- Plant Change Modifications (PCM) status/engineering support requirements
- Process sheets written

Preparations for future outages is a continuing process and improvements will continue based on experience gained from the dual unit outage.

o Clearances

As stated in the last SALP, FPL had committed to improving

shift meetings, and the previously mentioned outage planning improvements. The clearance procedure and training improvements discussed above are an aid in this area. Operations has also scheduled additional training on selected procedures to further aid in reducing personnel errors.

o **Component Identification**

In 1991, the component labeling program entered the maintenance phase with its primary emphasis on correcting identified deficiencies. Labels continue to be added as a result of equipment additions. Since the improved component identification program was implemented in late 1989, no mispositioning events due to mislabeling have occurred.

o **Improved Surveillance Tracking and Implementation of Revised Technical Specifications**

- Implemented a departmental instruction to insure that Fire Protection procedures are revised and implemented correctly.
- Established an enhanced Fire Protection Data Base to track Fire Brigade Training and qualifications, surveillance tracking, and departmental priority issues report.
- Upgraded manual Fire Protection equipment such as protective clothing, hoses, breathing apparatus, large hose stream monitor nozzles, portable cascade breathing air and trailer system.
- Increased knowledge level of off-site support organizations by providing site specific training on the Fire Protection Program at Turkey Point.

II RADIOLOGICAL CONTROLS

Radiological controls at Turkey Point have continued to improve since the previous SALP period. For example

- The Health Physics Department Letter of Instruction for radiological postings has been replaced with Procedure O-HPS-025.1, "General Posting Requirements for Radiological Hazards," to give Radiation Protection personnel better, more consistent guidance in posting radiological hazards.
- The Health Physics Department has begun a performance improvement program which places increased accountability for the quality of radiological controls, including radiological postings, on first-line supervisors. Health Physics supervisors have been assigned responsibility for an area which is inspected weekly by department supervision. Each supervisor's overall performance is critiqued during a monthly evaluation.
- Turkey Point is working to reduce the number of radioactive material storage areas on site. Storage areas inside the Radwaste Building have been reduced to a single 600 square foot bay. Approximately one third of the radioactive material stored in the Dry Storage Warehouse has been eliminated. Additional plans are in progress to reduce the number of sea-land storage containers and packaged waste staging areas.
- An administrative procedure

o **Contaminated Floor Space**

A reduction in the amount of contaminated floor space from 9,023 sq. ft. on July 31, 1990 to 6,616 sq. ft. was achieved prior to the start of the dual unit outage. Although the amount of contaminated floor space has increased to 15,878 as of May 20, 1991, this was an expected increase as a result of dual unit outage activities. A goal has been set to reduce this number to 6,345 sq. ft. by the end of 1991.

o **ALARA**

Improvements in the ALARA Program at Turkey Point

- Required training has been completed.
- New surveillance procedures have been functionally verified where appropriate and practical.

These reviews will be documented, reviewed and approved by the Maintenance Department heads and the Maintenance Superintendent prior to releasing a system or component for operation.

o Personnel Indicators

Improvements have continued from the previous SALP period in many of the performance indicators relating to Maintenance Department personnel. Following is a summary of two of these indicators:

demonstrated the capability of implementing its Emergency Plan and procedures to provide for the health and safety of the on-site personnel and the off-site public". (NRC Inspection Report Nos. 50-250/90-38 and 50-251/90-38, p. 2 of Summary)

FPL has also taken actions to address concerns raised by the NRC during the September 1990 SALP and the November 1990 emergency exercise, including:

- o **Technical Support Group in the TSC Needs Definitive Responsibilities and Current Information**

Training was enhanced to provide the Technical Support Group with more task specific information. Coordination and control of the Technical

o **Operator Training and Requalification**

- For the 1991-1992 requalification year, significant revisions have been made to all training materials to reflect the vast amount of change being done in the plant during the dual unit outage. This effort is currently on schedule and will culminate with a comprehensive pre-start evaluation of all crews on both infrequently performed tasks and plant changes that have been made during the outage. These evaluations will be observed by plant management and we have invited the NRC to participate.
- All operator training programs were successfully re-accredited as were the Shift Technical Advisor and Health Physics training programs.
- As mentioned above, the successful licensing of Group 13 has allowed the plant to approve transfer of 3 PTN licensed SROs to the training department in April 1991. After a three month turnover period, these SROs will replace contractors, thus reducing our dependence on contractors for operator

- (91-08), "In general, the audits were found to be well planned and well documented and contained items of substance related to the Radiation Protection Program." Also, "The inspectors noted that based on the depth of review and significance of identified issues, the present audit program was considered a program strength and had contributed to the Radiation Protection Program."
- (91-09), "The Quality Assurance audit and surveillance program provided management with a tool to ensure effective monitoring and implementation of the programs within the scope of this inspection." Also, "The inspector determined that the audit program was conducted in accordance with Technical Specification requirements, and that audits were conducted in such depth as to identify programmatic weaknesses if such existed."
- (91-12), "The inspectors reviewed the site QA audits and found that they were comprehensive and effective in licensee self identification of problems. The QA Group has been a significant factor in the licensee's self-assessment program in performing Technical Specification required audits and special audits as required by higher management."
- (91-14), "The inspectors reviewed a QA audit which demonstrated the organization's quality oversight involvement. The document was Audit QAD-PTN-90-039, EDG Phase 1, Design. The audit was comprehensive and used the methodology of NRC SSOMI audits."

Also, the plant staff in conjunction with QA personnel have made significant progress in reducing the length of time an audit finding remains open. In May 1990 there were 15 findings open greater than 180 days. In May 1991 there were 0. This is indicative of personal accountability in resolving identified problems and demonstrates an improving trend in quality.

Because the problems were first identified by Quality Assurance the NRC, in accordance with the new enforcement policy, issued four (4) non-cited violations during this SALP period, through May 1, 1991, (90-34-01, 90-36-01, 91-08-02, 91-08-07).

o Self Assessments

Notable self assessments and audits impacting nuclear safety and reliability conducted during this SALP. period have included:

- An in depth audit of Turkey Point's Emergency Power enhancements following the NRC's Safety System Outage Modification Inspection (SSOMI) format. Contracted technical expertise was utilized to augment QA staff and provide up-to-date industry knowledge. This resulted in areas being identified which enhanced safety and reliability of the Emergency Diesel Generator modifications.
- An integrated audit with Juno Beach QA staff was conducted to assess Turkey Point's effectiveness at implementing its Radiological Emergency Plan. The results of this audit determined that FPL's plans for responding to radiological emergencies are being effectively implemented, are in compliance with its licensing requirements, and that

- QA performed several root cause analysis investigations. Included in these was an investigation of nonconforming Component Cooling Water (CCW) heat exchanger tube material. Resulting corrective actions required this and all future material purchases to be included in the Stores' inventory management system. Findings stemming from an investigation of the movement of the Unit 4 Lower Reactor Internals resulted in improvements to the ALARA and RWP processes and procedural enhancements to ensure ALARA requirements are accurately transferred to Radiation Work Permits.

There have been no NRC violations against the Quality Assurance Department during this SALP period.

o Safety Assessment

- Increased awareness of the importance and effectiveness of self assessment.
- Improved teamwork.
- Improved communication.
- Rising standards and expectations with regard to the quality of work.

o **Communications with the NRC**

Formal presentations to NRC staff have occurred during the Dual Unit Outage (DUO). These presentations have provided for the exchange of information between Turkey Point Personnel and NRC staff. Informal discussions have also been held with site, regional, and headquarters NRC staff. Among other topics, these discussions covered FPL's plans for DUO evolutions and enabled the NRC to present their views prior to the initiation of these evolutions.

