



FPL

MAY - 4 1992

L-92-91
10 CFR 50.54

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Dockets Nos. 50-250 and 50-251
Request for Relief From Commitments Made
Prior to Submittal of Physical Security Plan, Rev. 0

By letter L-91-146, dated June 5, 1991, Florida Power and Light Company (FPL) submitted to the Nuclear Regulatory Commission (NRC) Rev. 0 of the new Physical Security Plan (PSP) for Turkey Point Units 3 and 4. By letter dated July 18, 1991, (William E. Cline to J. H. Goldberg) the NRC forwarded to FPL its acceptance of the Turkey Point Units 3 and 4 PSP, Rev. 0. Some of the major changes identified in the plan were related to the completion of the security upgrade project. This included hardening of vital areas, installation of intrusion detection, surveillance and access control systems, and the construction of new access control facilities. PSP, Rev. 0, has been implemented through Procedures, Security Force Instructions, and Post Orders.

Prior to the June 5, 1991 submittal of PSP, Rev. 0, a number of commitments were made in response to findings and recommendations made in past NRC Inspection Reports (NIRs). A listing of these commitments, with references to the NIRs and FPL correspondence, is provided in Attachments 1 and 2. Attachment 1 lists the items implemented in accordance with the commitments made in the referenced FPL correspondence. Attachment 2 lists the items whose implementation differs from the original commitment in the referenced FPL correspondence. Justification for changes from the original commitment is provided for each item in Attachment 2. Accordingly, the PSP, Rev. 0, in conjunction with its implementing procedures and instructions, has incorporated the commitments listed in the attachments.

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an FPL Group company

NON-SAFEGUARDS
per NRC/DRIS/R56B

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As of November 4, 1991, the upgrade of the Protected Area perimeter at Turkey Point was completed. By NRC Inspection Report Nos. 50-250/91-43 and 50-251/91-43 dated November 25, 1991, (Douglas M. Collins to J. H. Goldberg), the NRC verified full implementation of the PSP, Rev. 0, and requested removal of the interim security plan supplements. Therefore, by copy of this letter, FPL confirms the deletion of the six PSP Supplements which addressed the compensatory measures that were in place until completion of the Protected Area perimeter.

Should there be any questions, please contact us.

Very truly yours,



J. H. Goldberg
President
Nuclear Division

Attachments

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
R. C. Butcher, Senior Resident Inspector, USNRC, Turkey
Point Plant

ATTACHMENT 1 TO

L-92-91

<u>SOURCE</u>	<u>NRC CONCERNS</u>	<u>FPL COMMITTED CORRECTIVE ACTION</u>	<u>RESOLUTION</u>
1 NIRB3-25	Failure to maintain protected area (PA) alarms and surveillance system in operable condition	L-83-465: Procedure to be written on policy for how long equipment may be out of service	* Now have I&C staff dedicated to security - have a Security Systems Coordinator who tracks and expedites equipment repair, as referenced in the Physical Security Plan (PSP), section 3.1.1.5. A prioritized Work Order system is in place for repair of security equipment, as referenced in O-ADM-701.
2 NIRB4-39	Improper compensatory control of vital area (VA) door due to lack of communications at shift change	L-85-25: Commits to written temporary instructions for compensatory posts to be carried over from shift to shift	* Checklists are used to control the opening and closing of compensatory posts, as referenced in Security Force Instruction (SFI) 2006.
3 NIRB5-21	Scheduled security system computer outage not properly compensated for	L-85-326: Procedures reviewed and modified as necessary to ensure proper notifications and postings for compensatory posts. Independent review of contractor records to verify accuracy of notification and posting times	* Actions for planned and unscheduled computer outages are addressed in SFI 2501.
4 NIRB6-38	Plant work degraded security lighting	L-86-440: Plant procedures to be modified to require notification of security before security lighting is altered	* Procedure O-ADM-701 [Plant Work Order (PWO) Preparation] requires security notification/review prior to work on lighting.
	No procedures in place to implement devitalization and ensure area search before revitalization	Plant procedures to be developed to control devitalization and revitalization	* Procedure O-ADM-404 stipulates requirements for control of devitalization and revitalization.
5 NIRB6-40	VA barrier and compensatory controls circumvented by scaffolding	L-86-493: Plant procedures changed to require security review/evaluation before scaffolds are erected	* Plant procedure O-ADM-012 (Scaffold Control) requires security notification/approval before erection of scaffolding.
6 NIRB6-47	Material in isolation zone	L-87-38: Lines are painted on interior roadways to mark isolation zones. No-parking signs are placed on PA fencing to prevent parking in isolation zones.	* PSP, section 4.1.6, identifies objects which are located in isolation zones and commits to keeping zones clear. A number of different methods, including signs and nuisance fencing, are employed to preclude encroachment of isolation zones. Observation of isolation zones is addressed in SFI 2201.

<u>SOURCE</u>	<u>NRC CONCERNS</u>	<u>FPL COMMITTEE CORRECTIVE ACTION</u>	<u>RESOLUTION</u>
7 NIR87-05	Security Officer (S/O) asleep at VA compensatory post	L-87-213: Supervisors to make hourly checks of comp posts at night	* Commitment was modified per L-90-193, to state that S/O at comp posts are rotated periodically throughout their duty shift to assure attentiveness to duty. Post Instruction (PI) 6921 requires frequent post visits by the Supervisor.
		S/O working hours restricted to IE Notice 86-88 guidance	* The security force contractor has adopted IE Notice 86-88 guidelines.
		Security events to be reported and tracked by management	* PSP, section 3.1.1.2, addresses trending of security events as part of the Security Operations Supervisor's duties.
		Monthly quality improvement meetings to be held by plant and corporate security management and security contract management	* Meetings between licensee and contract security management are held and are required by contractual agreement with Security Bureau Incorporated (SBI).
8 NIR87-11	Unescorted visitor	L-87-213: Signs posted on-site to indicate that visitors require escort	* Signs are posted on site. SFI 2201 directs S/O to be observant for unescorted visitors.
9 NIR87-25	Improper material search and access control at containment	L-87-362: A system to determine access authorization based on job description and need for access to be developed	* Access Authorization Request Forms (Procedure O-AEM-402, Access authorization and Control) are used to determine access based on job description.
		Both plant and corporate security to review procedures prior to implementing revisions	* As described in the PSP, section 3.2.6, procedures are developed and modified at the plant level.

SOURCE	NRC CONCERNS	ISSUED CORRECTIVE ACTION	RESOLUTION
10 NIRS7-38/47	<p>Failure to control access to containment.</p> <p>Lighting did not meet 0.2 footcandle commitment.</p> <p>S/O asleep on static post.</p>	<p>L-88-149, the inspection of locks on the containment personnel hatches and emergency exits will be included in seven (7) day operability checks.</p> <p>Routine lighting checks will be made and patrols will be instructed to observe lighting.</p> <p>Interim commitment to thirty (30) minute radio checks and hourly rotation of static posts.</p>	<p>* SFI 2004 requires that locks on containment personnel hatches and emergency exits be seven (7) day operability tested.</p> <p>* SFI 2302 requires periodic assessment of 2A lighting.</p> <p>* Reduction in static posts due to upgrades, changes in shift schedule and reduction of personnel turnover have reduced need for frequency of radio checks and hourly rotation. Commitment was modified in L-90-193.</p>
11 NIRS8-03	<p>Intrusion Detection System (IDS) alarm on section of PA fence not working (construction related)</p>	<p>L-88-149, Plant procedures for construction project, and work activities involving security barriers/equipment to be reviewed by security before work begins. The procedures will be revised to assure the identification of any degradation of security effectiveness.</p>	<p>* Plant procedures, Q13-P78-1, O-ADM-012, and O-ADM-701, require security review of plant change modification (PCM) packages and PWDs before work starts.</p>
12 NIRS8-16	<p>Tamper alarms not functionally tested before deactivated alarms returned to service.</p> <p>Failure to notify S/C in timely manner of change to PA configuration.</p>	<p>Plant procedures revised to require tamper alarm testing before returning alarms to service.</p> <p>L-88-365, will establish requirements for review, approval, and submittal to NEC of PTF Changes.</p> <p>Will have a corporate procedure for defining control for Plan review, approval, submittal of plan changes.</p>	<p>* IAC Work Orders carry directions for tamper testing. SFI 2004 an SFI 2300 require tamper testing following deactivation of IDS/Door Control Unit (DCU) equipment for maintenance.</p> <p>* PSP, section 10.4, commits to mechanics for plan changes due to construction work or redesign.</p> <p>* As referenced in JNSC-PSP-1, the Manager - Nuclear Security (Corporate) must review and sign plan revisions prior to their submittal to the Commission.</p>

SOURCE

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FPL COMMITTED CORRECTIVE ACTION

RESOLUTION

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| 13
NIR88-20 | Comp post left unattended due to misunderstanding during post relief. | L-88-434. Post relief instructions revised to require: 1) On-coming S/O to sign post log. 2) Supervisors must Sign S/O log, and 3) CAS must be notified of relief. | * The mechanics of post openings and closings are stipulated in SFI 2026. |
| 14
NIR88-31 | Degraded VA barrier. | L-89-84. Revised drawings of VA barriers to be maintained by security.

A Security Barrier procedure to be developed by FPL security management to review/approve compensatory posting and changes. | * VA Drawings are maintained by the Plant Security Supervisor.

* Requirements for security review of plant work and change orders are contained in Plant Procedures Q13-P-1, O-ADM-012, and O-ADM-701. |
| 15
NIR89-03 | Failure to control VA containment hatch.

Unmarked, unsecured Safeguards Information. | L-89-125. FMO modified to require assurance of security posting before unlocking or entering containment.

Safeguards procedure revised to provide centralized control of safeguards documentation. | * The plant containment entry procedure, O-SM-009, contains request for security stand by for containment opening.

* FPL Procedure O-ADM-410 (Protection of Safeguards Information) makes the Plant Security Supervisor responsible for plant-wide Safeguards Information protection program. |
| 16
NIR89-09 | Inadequate VA barriers (louvers in some VA doors). | L-89-172. Security will review future design change and modification packages.

Security barriers will be addressed in General Employee Training (GET) to increase awareness. | * Requirements for security review of POM packages are contained in Plant Procedures Q13-FTS-1, O-ADM-012, and O-ADM-701.

* PSP section 3.4 commits to security training as a part of GET. |

ATTACHMENT 2 TO

L-92-91

<u>SOURCE</u>	<u>WEC CONCERNS</u>	<u>FPL COMMITTED CORRECTIVE ACTION</u>	<u>RESOLUTION</u>
1. N1883-02	Vital area (VA) alarm failed to annunciate audibly in CAS/SAS	L-83-141: Alarm annunciator checks to be conducted once per shift	* Complete new system installed and the reliability of the system is such that alarm annunciator checks do not need to be conducted once per shift.
2. N1887-05	Security Officer (S/O) asleep at VA compensatory post	L-87-213: Thirty (30) minute radio checks to be made with posts during nights	* In accordance with Security Force Instruction (SFI) 2004, and SFI 2100, audible and visual alarms are tested once each seven (7) days. * S/O at posts are rotated periodically to assure attentiveness to duty. Supervisors are required by Post Instruction (PI) 6921 to make frequent post visits. Sleeping S/O problems have been resolved by reduction in compensatory posts and changes in shift schedule. Therefore, thirty (30) minute radio checks are not necessary.
3. N1887-11	Unescorted visitor	L-87-213: Distinctive visitor badges and hats used to identify visitors who must be accompanied by an escort.	* This commitment was further re-evaluated with the inception of the new security system and new visitor processing techniques. Only the distinctive colored badges were committed to in the new PSP, section 5.2.2. Plant Procedure O-ADM-402 (Access Authorization and Control) requires escorts to read and sign an Escort Responsibilities form.
4. N1887-25	Inadequate vehicle search	L-87-362: Number of K-9s and handlers will be expanded and vehicles will be both K-9 and manually searched. A vehicle entrapment area will be constructed at the South Gate	* Because of the security upgrade and the new vehicle entrapment search area, K-9s are no longer used for vehicle searches. S/O search vehicles in accordance with SFI 2100. * A permanent vehicle entrapment area was completed with the Security Upgrades, and it is located at the Main Truck Gate.
	Improper material search and access control at containment	Separate plastic protective packs provided to allow for the physical inspection of badges at containment entry. Orders shall be changed to require S/O to inspect materials and packages entering containment.	* The method for controlling access to containment has been changed to assure positive identification and S/O are required to inspect materials entering the containment, as referenced in the Physical Security Plan (PSP), section 5.1.2.4, and SFI 2108.

SOURCE

NRC CONCERNS

EPL COMMITTED CORRECTIVE ACTION

RESOLUTION

5
NIR87-38/47

S/O asleep on static post

L-88-120/153: Security force supervisor training conducted quarterly. Random on the job task performance evaluations conducted by supervisors. All members of security force to receive task performance evaluation quarterly.

* Task performance evaluations conducted at random by supervisors and documented and tracked by Training. Security force training is conducted in accordance with the Training and Qualifications Plan (TQP).

6
NIR7-53

Improper protected area (PA) access control

Security personnel who have submitted resignations will be reassigned to non-critical duties prior to last work day.

* Supervisory Fitness for Duty continuing observation program helps to identify any potential poor job performance. The poor job performance on the part of an Officer who had submitted a resignation was an isolated case.

7
NIR88-03

Newly constructed storm drain passing under PA fence not secured.

L-88-149: Security to maintain a log of security related construction and work activities.

* PSP, section 5.1.2.5, commits to escorting persons who are suspended or terminated for cause.

8
NIR89-45

Procedural violation in verification of out-of-service equipment before d-vitalization.

L-91-050: Devitalization procedure revised to temporarily require Nuclear Safet, Committee and Plant Manager approval for devitalization.

* Because of mechanism in place for Security to review all construction or plant change modifications (PCMs), (O-ADM-701 and Q13-PTS-1) maintenance of a log is not necessary.

9
NIR90-45

Procedural violation in verification of out-of-service equipment before d-vitalization.

L-91-050: Devitalization procedure revised to temporarily require Nuclear Safet, Committee and Plant Manager approval for devitalization.

* O-ADM-404 has been revised to clearly state the conditions for devitalization and revitalization. The temporary commitment for Nuclear Plant Safety review is no longer necessary. The Nuclear Plant Supervisor (NPS) signature is required.