Florida Power
CORPORATION

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Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Nuclear Security Management Improvement Program

Dear Sir:

As requested at our February 10, 1987 SALP Meeting, enclosed is a description of Florida Power Corporation's Nuclear Security Management Improvement Program. We will be prepared to update the staff on the status of our management improvements at the May 20, 1987 SALP Meeting.

Sincerely,

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Vice President
Nuclear Operations

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Enclosure

xc: Dr. J. Nelson Grace
Regional Administrator, Region II

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NUCLEAR SECURITY MANAGEMENT

IMPROVEMENT PROGRAM

Introduction

Enhanced management attention and the use of improved management techniques are recognized as the means for eliminating continuing incidents in the security area at CR-3.

FPC Management is committed to this program's approach.

The theme of the effort is an emphasis of basic management techniques and principles. Aspects of this awareness include:

- enhancement of the security organization
- stating the basic issues
- tracking and trending techniques
- increased training activities
- improvements to equipment
- clarification of requirements

There are two phases to this program. The first encompasses the year 1987, and the second includes 1988. The following describes efforts during the first period. The follow-up efforts are described in less detail under a separate heading at the end.

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The Security Organization

In addition to the organizational description and commitments contained in the Security Plan, we have reassigned responsibilities within the organization (Refer to the attached diagram of an enhanced security organization.)

Full responsibility and authority for management improvements in the nuclear security area have been delegated to the Nuclear Security Manager. This is the only responsibility held by that position. The position has the complete management support necessary to achieve a demonstrably capable nuclear security operation, including financial resources and priorities to obtain equipment improvements and adequate, qualified manpower.

The three divisions under the Nuclear Security Manager recognize the need for increased emphasis in three different types of security activities - namely, day-to-day operation of the security shifts, modification and maintenance of security equipment, and training of the security force including the proceduralization of activities. This dividing of responsibilities is intended to promote/permit greater in-the-field time by management and supervision. It also recognizes the strengths of the individuals involved and gives them responsibility for areas in which they can be of particular benefit to present challenges.

The Nuclear Security Superintendent will devote one hundred percent (100%) of his time to the operational work of the security organization and perform the functions previously assigned to the Nuclear Security Officer. This includes items such as shift manning levels, security contractor coordination, clarification of instructions to uniformed personnel, routine assessment of individual performance on-shift, and access control functions. In conjunction with the Nuclear Security Specialist, he will determine the adequacy of training already provided, as well as the need for additional training. In conjunction with the Nuclear Security Officer, who will on a project basis be responsible for hardware, he will determine and then implement special compensatory actions in support of equipment modifications or repair.

The Nuclear Security Specialist will oversee all security training. This includes the conducting of supervisory training which is in addition to other security training conducted for all uniformed regular and supervisory personnel. This position is also responsible for ensuring that security procedures accurately reflect FPC's commitment to security. He further generates any required reports and responses to inspection and audits.

The Nuclear Security Officer will, on a project basis, be responsible for coordinating security department inputs to the design, construction, and implementation of modifications to security equipment. He also coordinates routine maintenance and post-modification testing of security equipment to ensure that equipment performs as required. As shown on the attached diagram, he is the primary interface between security and the engineering and maintenance

groups.

An open position in the operational security organization was created earlier this year. Extensive efforts will be taken to ensure that the person selected to fill the position possesses demonstrated experience and skills necessary to manage the responsibilities assigned. An extensive recruiting effort was begun in early February.

The staffing level within each of the four security shifts has been increased by three positions. This was done to ensure an adequate number of personnel to meet both normal and unforeseen situations.

Awareness of Basic Management Issues

There are two issues involved in the management of the security group which may have not relceived the full recognition that they deserve. This acknowledgment is most important in that many previous security problems at CR-3 can be directly related to inadequate recognition of the issue. They are concisely expressed by the following:

First, changes and/or unusual conditions create most of the problems. Changes may be in the form of hardware or software, as the following list partially indicates:

- revision of a procedure
- modification of security equipment
- creation of a new permanent post
- revision of the schedule for performing a repetitive, routine task
- hiring of new security personnel
- moving personnel from one shift to another
- revision to the sequence in which an activity is performed
- modification of vital or protected area barriers

Unusual conditions may occur in some of the following ways:

- a temporary post is required, such as for compensatory action.
- modification work on non-security systems/equipment creates previously unforeseen security problems.
- a major degradation occurs expectedly or unexpectedly in a security

system.

- supervision is distracted by an unusual administrative task.

While the above examples are not intended to completely list all possibilities, they are broadly representative of the type of management challenge existing in security operations. Specific recognition of the nature of changes and/or unusual conditions will heighten management awareness of the areas deserving increased attention.

The second area to be recognized is the need for the use of basic management tools and principles versus short-range "mechanical fixes". It is recognized that problems which we believe had been corrected, reoccured. Insufficient attention was given to root cause determination, or to ensuring that necessary corrective actions were fully implemented. There are three sub-parts to explaining why these omissions have occurred. They are:

- inadequate follow-up
- inadequate understanding of the impact of changes on other activities
- lack of prioritization

These subjects are discussed under tracking and trending and are included in the discussion on supervisory training.

Tracking and Trending

A "tickler file" system has been initiated to better organize the variety of work activities encountered by security management. It also is used as a follow-up system to verify implementation of requirements established both from within security management and outside of it, and also serves, to some extent, as a means of prioritizing activities.

A trending system was begun as of the beginning of the year. It is divided into two areas - one for equipment and the other for personnel activities. Within the equipment section, there are records for each major category of security equipment.

Input to the trending system is from any source of information which indicates a deficiency in equipment or personnel actions. Typical input sources are security Unusual Incident Reports (UIRs), Work Requests, and any adverse results of inspections and audits. The input is entered in the appropriate section of the trending log. On a monthly basis, that period's data is summarized for the month and year-to-date periods. Monthly values are plotted on graphs to depict a trend for occurrence for each type of equipment or personnel activity. Realistic results will not be available from the trending program for at least six months.

Training

Supervisory training is seen as the most important need and has several aspects to it.

The most informal and frequently occurring training is the monthly Captains' meeting, which includes all four security shift supervisors (Captains), FPC security management, security training coordinatcr, and the security contractor project manager. These meetings are held in a seminar format. During each meeting, a major portion is devoted to a specific theme. January's meeting concentrated on supervisory field presence and methods to ensure adequacy. February's meeting concentrated on follow-up.

Formal supervisory technique training meetings are conducted about once per calendar quarter, with the most recent meeting held on March 4, 1987. The subject was "Leadership Training" and the meeting was held in Gainesville, Florida. Others are scheduled throughout the year.

Additionally, FPC security management and the security contractor are examining other supervisory training programs. One of these programs employs techniques for immediate utility by participating supervisors. It is directed at supervisory field time and the seeking out and correction of problems.

All uniformed security personnel are now subject to quarterly requalification training, including the need to recertify weapons' proficiency. Also, they receive annual familiarization with night and

stress firing of weapons.

As part of the CR-3 plant goals program, there are two goals in the area of security training. One relates to weapons proficiency scores, and the other deals with written test score levels.

Equipment Improvements

Some of the recent security problems have been related to inadequate equipment. It is recognized that the need to provide compensatory measures for equipment creates the possibility/probability for problems to occur as discussed in the earlier section about basic management issues. Improved equipment will be obtained through management commitment to provide the resources for them and from the security groups providing a dedicated security individual to coordinate implementation.

There are several open modification requests in the security area. Four of these have major priority for completion during 1987. Each is described below.

By the end of the second quarter of this year, inner barriers will be installed on the Green/Yellow Room and Hot Machine Shop areas so that they can be devitalized. The barriers will contain portals controlled by the security access controller in similar manner to other internal plant doors. The repetitive personnel traffic in these areas will then be electro-mechanically controlled rather than by security personnel. This project will eliminate the following as vital area doors - A203, A204, E101, and F101. Two doors will replace these four.

The security computer upgrade project will replace the present RUSCO MAC-540 system with a more "state-of-the-art" CPU system. An on-going study to specify and evaluate alternative equipment will be completed

during the third quarter of 1987. The actual installation of a new computer will continue into the following year.

The protected area entry guardhouse will receive turnstiles to control personnel traffic. This will prevent tailgating entries. In conjunction with the turnstiles, a power cut-out switch will be installed in the alternate badge issue area. This modification allows final access control from the alternate as well as the primary badge control point. This project will be completed during the third quarter of this year in order to assist traffic control during the next refueling outage.

The fourth major project provides an emergency source of power to site security lighting. The TSC diesel generator will be used for this additional service. The modification will be completed by the end of the fourth quarter of this year.

As mentioned above under organization discussions, security management is dedicating a person to coordinate security's interests in all of these projects. This will be the primary focus of this position.

Security Plan Clarification

The present revision of the Modified Amended Security Plan has often been the basis of confusion between the NRC and FPC. Some areas have been identified as being ambiguous or incomplete. This has led to interpretations and subsequent differences of opinion as to requirements and intent. In order to minimize any such misunderstandings, the Security Plan will be completely rewritten.

The Nuclear Licensing group will lead this effort. The Nuclear Security Manager will provide security interface during the rewrite.

The rewriting phase will be preceded by a more formal method of identifying necessary revisions to the plan and by visits to other nuclear plants sites and NRC offices. These visits will be for the purpose of determining the most desirable, acceptable, and successful characteristics for a Security Plan. Both licensing and security personnel will make visits.

Security is particularly interested in other aspects of other sites' security activities. These include staffing, facilities and equipment, and methods or procedures for control of activities. Beneficial ideas will be incorporated into the security program to every extent possible.

The clarification of the Security Plan will be accomplished during the first half of 1988.

Continuation of Security Improvements

Next year's task will be to focus upon a consolidation of the gains and improvements made in 1987.

The security organization will be examined to determine the need for further realignment of responsibilities.

The security trending system will provide indication of the adequacy of remedial measures for personnel deficiencies and of equipment modifications.

Procurement and installation of the new security computer for access control will continue through 1988 and the beginning of 1989.

Any revisions required for the Contingency Plan and the Security Training and Qualification Plan as a result of rewriting the Security Plan will be made.

SECURITY ORGANIZATION

(ENHANCED)