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Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, N.W.,
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Systematic Assessment of Licensee Performance

We have reviewed your letter dated February 7, 1985 containing the NRC Systematic Assessment of Licensee Performance (SALP) for Turkey Point Units 3 & 4 and St. Lucie Units 1 & 2. We have no comments concerning your evaluation of St. Lucie Units 1 & 2. However, please find attached a discussion of the actions underway to address the appropriate areas for Turkey Point Units 3 & 4 as requested.

As you are aware, we have provided a major commitment of resources to enhancing the safe and reliable performance of operations at Turkey Point. Every functional area mentioned in the attachments is already being positively affected by these programs and performance will continue to improve as these initiatives are completed.

However, FPL takes exception to the rating applied to the Radiological Controls Category at Turkey Point Units 3 & 4. As detailed in the attachment, we believe that the exposure data used in the SALP are not completely accurate, and that the subjective opinion of the Health Physics activities at Turkey Point is not fully supported by the facts quoted nor the actual exposure data. It is our opinion that we have an aggressive

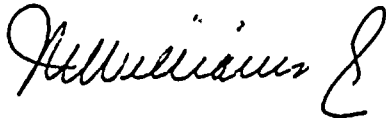
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Dr. J. Nelson Grace
Page 2

and effective radiological protection program at Turkey Point, and that it is continuing to improve. In addition, we believe that our implementation of a water chemistry control program based upon the Electric Power Research Institute (EPRI) guidelines at Turkey Point continues to be among the most aggressive in the industry.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. W. Williams, Jr.", followed by a large, stylized flourish.

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/JEM/cn

Attachment

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Specific Comments to NRC SALP

A. Plant Operations

We agree with your observation that substantial progress towards improvement has been made in this area. More importantly, all of the major concerns identified in the SALP are being addressed by the Performance Enhancement Program (PEP), as well as other management initiatives. We fully expect improvement to continue.

Management emphasis on procedural compliance had created a large number of "On the Spot Changes" to existing procedures. These changes are currently diminishing as PEP Project 3, Procedures, progresses and existing procedures are upgraded through the procedure real time support group. The new procedure format is clearer, more operator friendly and technically better than the existing procedures.

We have applied increased management attention to the resolution of technical issues. These actions include the placement of engineering personnel on site, emphasis on addressing concerns on a coordinated plant basis to identify root cause, and the redirection of the Shift Technical Advisor (STA) program. The STA now provides increased attention to technical specification compliance and operability criteria. This integration of the STA into closer contact with daily plant operations has provided a more enhanced approach to the resolution of technical issues on a real time basis.

In addition, ambiguous or unclear technical specification wording is receiving clarification and is being promulgated through procedure incorporation and/or training briefs. In the longer term the PEP Project 10, Technical Specification will provide improved operation based upon the Standard Technical Specifications (STS). Project 11, System Operability, will assist in the changeover to the STS and provide more definite testing criteria.

Another PEP Project directly affecting the Operations area is Project 5, Training. This project will provide performance based training programs for licensed and non-licensed operators. Project 2 Operations Enhancement has provided additional shift staffing, instituted training programs for operations personnel on regulatory compliance, developed an improved independent verification system, and is implementing an equipment marking system. These programs will give our personnel a sound and detailed basis for all future operations.

B. Radiological Controls

Our review of the section of the SALP report concerning Radiological Controls highlighted areas where our information and conclusions differed from those of the NRC's. It is our position that our health physics and chemistry programs are effective and improved over the past SALP period. We continue to be active in these areas in order to remain current with industry practices.

Radiological cleanliness controls have increased and will continue to do so. Tracking the number of personnel contaminations in 1983 and 1984 revealed that a greater than 50 percent reduction had taken place. The hiring of an additional 22 helpers has been authorized which will help ensure that contaminated areas are maintained in a clean state.

On-site training and screening of health physics contract technicians has included; 1) screening of senior technicians through on-site interview and investigating previous work habits and responsibilities at other nuclear utilities worked, 2) ensuring compliance with appropriate ANSI qualification standards, and 3) both written and oral examination of all senior technicians. We have expanded our indoctrination program to more fully cover plant and health physics policies and procedures (this area included exclusion area and reactor sump entry requirements).

We believe the ALARA program at Turkey Point is effective and producing positive results. The total collective dose in 1983 by TLD was 2602 man-rem. In 1984 the total collective dose was 1200 man-rem (by TLD), a greater than 50 percent reduction from 1983. This value, 600 man-rem per reactor, is close to the industry average for all PWR's and lower than the average for older PWR's (such as Turkey Point) based on historical data.*

You state in the SALP report approximately 60 man-rem is received by plant workers each month in the performance of routine non-outage tasks. Our review shows, in evaluating monthly data during the SALP period and in accordance with guidance provided in Regulatory Guide 1.16, the average exposure received by plant workers in the performance of routine non-outage tasks (i.e. does not include special maintenance or work associated with a forced outage) is approximately 20 man-rem per month by pocket dosimeter. Taking into account special maintenance and forced outages this value increased to approximately 48 man-rem per

*Based on information compiled from NUREG 0713, Vol. 4, 1982 and INPO Summary of 1983 Occupational Exposures for U.S. Commercial Nuclear Power Plants (8/16/84).

month (by pocket dosimeter) when averaged over the SALP period. Throughout the SALP period numerous exposure reduction techniques had been employed. These included flushing of identified hot spots, extensive preplanning of temporary shielding for scheduled outages and installation of permanent shielding. A more aggressive ALARA program involving department plant supervisors and managers is receiving increased licensee management attention.

We believe that the Turkey Point Plant has a comprehensive and aggressive program for maintaining the purity of the water within the steam generators. This includes the incorporation and use of systems and components that were installed under the Company's Steam Generator Protection Plan, (SGPP) combined with an aggressive parameters control program. Our chemistry program has resulted in significant improvements in the quality of water in the steam generators. The effectiveness of this program for maintaining water quality is further evidenced, as noted in Inspection Report Nos. 50-250/84-06 and 50-251/84-06, by the results of our steam generator inspections.

We do take exception to the specific item in the SALP report which pertains to the formal academic training of our chemistry supervisors, and are providing the following information in order to provide clarification on that item. Two of the four supervisory positions in the Turkey Point Chemistry Group held professional degrees in Chemical Engineering. The first individual had a B.S. in Chemical Engineering and had more than 10 years experience in nuclear plant chemistry/radiochemistry. The second individual had an M.S. in Chemical Engineering, 3 years of industry experience and another 1.5 years in the Chemistry Group at Turkey Point. The remaining two supervisory positions were staffed by individuals who had received extensive formal academic and operational training and experience in chemistry and radiation controls as a part of the US Navy Nuclear Program. The combined commercial nuclear plant experience in the chemistry field for these two individuals was more than 16 years. Additional training and experience has been supplemented by college chemistry courses and strong participation in Electric Power Research Institute chemistry programs.

Other areas of improvement which began during the SALP period include:

1. A study performed by Batelle N.W. Laboratory using state-of-the-art equipment, to reevaluate neutron exposures and energy spectra in containment while at power, and beta exposure and energy spectra throughout the plant. This study was taken on FPL's own initiative and is presently being evaluated.
2. Completion of the basic health physics technician job task analysis program. Turkey Point is planning to apply for INPO accreditation in mid-1985.

3. Approval for the addition of one senior health physicist to increase technical and supervisory support at the plant.
4. Construction of a new health physics facility providing 9,000 square feet strictly for health physics related activities.
5. The health physics real time computer system is being upgraded to enhance existing capabilities. These enhancements include:
 - a. trending of ALARA data and projection of estimated doses and manhours
 - b. implementation of 4 chip TLD algorithms
 - c. tracking of multibadge and extremity TLD data, and
 - d. increase the number of parameters available to restrict access into the Radiation Controlled Area.
6. Implementation of new health physics procedures by the Procedure Upgrade Project (PEP Project 3).
7. Development of chemistry technician training by PEP Project 5, Training.
8. Development of a comprehensive laboratory QC program for chemistry and radiochemistry samples and equipment.
9. An engineering evaluation designed to upgrade the plant's sampling facilities with particular emphasis on "on-line" sampling was initiated.

C. Maintenance

The maintenance area at Turkey Point has been and continues to be the subject of considerable Management attention. New department management, procedural modifications and development, as well as the use of the new planning tools from PEP Project 9, Maintenance, has contributed to enhanced performance in this area. Also, as part of the PEP program an Operations-Maintenance coordinator position was created. The responsibility of this position is to provide daily planning and scheduling of critical maintenance activities. During outages, this coordinator works closely with all maintenance departments to plan activities in series or parallel depending upon the nature and area of work activity.

However, our evaluation of the SALP findings has shown the need for the further enhancement of the Maintenance Program in several areas. These enhancement areas include; (1) an improved preventative maintenance program for safety-related equipment;

(2) a spare parts program, and; (3) the development of guidelines for control of work in areas of troubleshooting and repair.

The development of these areas will be derived in part from our current activity in the industry wide spare parts system (Pooled Inventory Management System), our work to meet the NUMARC commitments on Maintenance, and our INPO commitments regarding maintenance. PEP Project 9, Maintenance Management has provided a nuclear specific work order and Generating Equipment Maintenance System, a mechanism for tracking PWO backlog and a job planning system. Project 5, Training will produce performance based training programs aimed specifically for maintenance Personnel.

I. Quality Programs and Administrative Controls Affecting Quality

As indicated by your conclusion, our review of the trend of management control of quality activities indicates a significant improvement during the SALP evaluation period. The establishment of PEP and the Program for Improved Operation has substantially increased the degree of management awareness, accountability and involvement in all areas of quality. These programs and other prudent actions are being routinely implemented to assure that appropriate actions are being taken to correct quality program deficiencies such as those identified during the SALP.

As a task of PEP Project 8, Quality Assurance/Quality Control, a complete evaluation of the Quality Assurance audit program has been completed. Corrective actions have been taken to assure that audits identify and correct significant program weaknesses. In addition, the QA staff in conjunction with plant management is developing a more effective program to evaluate plant events. On a routine basis this program will more effectively identify significant program deficiencies.

Review and evaluation of activities affecting the quality of plant operations by the Plant Nuclear Safety Committee (PNSC) is being improved. A comprehensive training program for the plant management staff and the revised PNSC operations as described in the Program for Improved Operation will assure continued high performance of this activity.

During the latter part of the SALP evaluation period, management attention to assuring an understanding of the quality role in the overall maintenance program has been significantly increased. A program for identifying and implementing QC holdpoints for maintenance activities has been implemented with particular emphasis on middle level management involvement. This program will continue in the long-term as part of PEP Project 3, Procedure Upgrade Program. In the near term, special emphasis is being placed on real-time review and incorporation of QC holdpoints

for maintenance activities during the upcoming refueling outage. The PEP Project 4, Configuration Control has resulted in a drawing update program to control changes to plant drawings.

Therefore it is our consideration that increased management attention to all areas of administrative controls affecting quality has resulted in, and will continue to provide, a significant improvement in the implementation of the overall Quality Program.