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 FACIL: ~~50-50 Kinetic Experiment on Water Boilers Model (L-47)~~, North 05000050
~~50-251~~ Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME: AUTHOR AFFILIATION
 CONWAY, W.F. Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 ERNST, M.L. Region 2, Ofc of the Director

50-250/251

SUBJECT: Requests NRC approval to terminate oversight program & reporting requirements as confirmed by NRC Order EA 87-85.

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 TITLE: Turkey Point Management Onshift Program

NOTES: Model L-47 reactor dismantled & license terminated 6/30/58 05000050 S
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DECEMBER 15 1988

L-88-506

Mr. Malcolm L. Ernst
Acting Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W. Suite 2900
Atlanta, GA 30323

Dear Mr. Ernst:

Re: Turkey Point Unit Nos. 3 and 4
Docket Nos. 50-250 and 50-251
Request to Terminate the Continuous
On-Shift Oversight Program

On August 14, 1987, Florida Power & Light Company (FPL) instituted a Management on Shift (MOS) program at Turkey Point plant. The program was instituted as a result of a number of events which raised questions concerning the accountability and performance of personnel involved in operations of the plant. Management wanted to understand what was causing the problems and what was needed to correct them. Because most of these events were occurring on the backshift, the decision to institute the program was therefore the result of this identified need for management presence on the backshift. In addition, management presence on the backshift would convey site goals and objectives as well as uncover the barriers and problems in meeting these goals and objectives. The program consisted of ten 2-man teams with management and SRO experience to monitor operations, plant support activities and interfaces.

NRC Order EA 87-85, issued on October 19, 1987, confirmed the MOS program and required certain modifications to it. The program was subsequently modified to a continuous on-shift oversight program. In accordance with the NRC Order, the procedure for the oversight program was provided to the NRC in FPL letter L-87-443, dated October 30, 1987. The Order also confirmed FPL's commitment to perform an independent management appraisal (IMA).

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The NRC Order provided that the oversight program could be relaxed or terminated by the Regional Administrator upon submittal of written justification. The purpose of this letter is to request the termination of the oversight program and its reporting requirements. The oversight program has been conducted in accordance with the requirements of the Order, and has clearly met FPL's objective in initiating the program. FPL believes that improvements in the performance of the Operations department have been made, and Operations is now demonstrating the leadership and ownership necessary to sustain the improvements. Continued management emphasis will ensure that improvements in Operations do not diminish.

Since the beginning of the oversight program, significant steps have been taken to strengthen plant performance. The Turkey Point staff has been strengthened by the addition of an experienced Plant Manager with a proven record of success in the management of another nuclear facility, and by the addition of a new Operations Superintendent with extensive, successful performance at St. Lucie plant. These and other personnel changes were described in FPL's response to the IMA and AEOD Report.

Operations personnel are now establishing priorities for maintenance and other plant support functions. This has strengthened the accountability of Operations and other personnel and is a countermeasure to deal with the "passive" culture which was noted by AEOD in its comments on the IMA. Current plant management has taken action to aggressively resolve outstanding issues and problems which have occurred during plant operation and are holding personnel accountable for resolving these issues and problems. In addition, a corporate operating philosophy which places a premium on plant reliability, even at the expense of lower availability, has been clearly articulated. This should help improve the reliability of equipment used by the operators.

In FPL's view, these changes have made a marked difference in operations at Turkey Point. An enhanced sense of ownership and accountability on the part of the PSN's is one of the most important contributors to improved Operations performance. Among other things, the PSN's observations substantially overlap the observations of oversight personnel.

As indicated in the foregoing discussion, FPL is satisfied that the objective in initiating the oversight program has been met, and that management is confident in the ability of our operators to safely and responsibly operate Turkey Point. However, FPL believed it to be prudent to have an independent assessment performed on the oversight program. ENERCON was asked to perform the assessment because of their familiarity with the past performance issues at Turkey Point, and because they could compare their observations


made during the Independent Management Appraisal (IMA) with observations made during this assessment.

ENERCON's assessment was performed by individuals who also participated in the IMA, and consisted of reviews of recent oversight and PSN shift reports, interviews of oversight observers, PSNs, and plant management. Additionally, multiple random visits were made to the control room, where the ENERCON observer monitored shift briefings as well as PSN interface with construction, maintenance, management, and other operations personnel.

ENERCON found a definite improvement in the level of professionalism and discipline in the control room. ENERCON concluded that the objective of the oversight program had been met. In eliminating the oversight program, FPL will periodically conduct independent evaluations of the effectiveness of the operating shifts and will complete resolution of the MOS items still open. ENERCON's "Report on the Independent Evaluation of the Turkey Point Nuclear Station Management On Shift Oversight Program" is available for review by the NRC.

Based upon the information presented above, FPL requests NRC approval to terminate the oversight program and the reporting requirements as confirmed by NRC Order EA 87-85. FPL would appreciate acknowledgement that all conditions of EA 87-85 have now been fulfilled.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/RJS/cm

cc: Senior Resident Inspector, USNRC, Turkey Point Plant

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