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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME AUTHOR AFFILIATION  
 WOODY, C. O. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 GRACE, J. N. Region 2, Ofc of the Director

SUBJECT: Forwards response to NRC comments & revised Independent  
 Mgt Appraisal Program Plan.

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DECEMBER 30 1987

L-87-539

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

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Independent Management Appraisal

Your letter of December 2, 1987, summarizing the results of your review of the Independent Management Appraisal Program Plan submitted by Florida Power & Light Company (FPL) on November 18, 1987 (L-87-470), included thirteen specific comments. FPL forwarded these comments to ENERCON Services, Inc., and after reviewing the comments with ENERCON, we agree that some Program Plan changes would be useful to accommodate many of the comments.

The attachment to this letter addresses each of your comments and makes reference to revised Program Plan pages and/or sections where applicable. A copy of the revised Program Plan is enclosed.

Very truly yours,

  
C. O. Woody  
Executive Vice President

Attachment

Enclosure (Independent Management Appraisal Program Plan, Revision 1)

cc: Document Control Desk, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant  
J. M. Taylor, USNRC  
J. J. Hudiburg, Chairman of the Board, FPL  
R. E. Tallon, President, FPL

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## ATTACHMENT

### NRC COMMENT NO. 1:

The Plan does not appear to address directly important problems that have already been identified as principal weaknesses at the Turkey Point site. These include the aspects of teamwork, leadership, professionalism, accountability, explicit management goals and objectives, measures of achievement, etc. -- in short, it does not address explicitly the culture needed to improve performance. However, in your response (dated September 21, 1987) to our recent Systematic Assessment of Licensee Performance, you appropriately made reference to weaknesses in accountability, employee awareness, plant and corporate goals and expectations, team involvement, and dedication.

### RESPONSE:

Refer to the Program Plan (Revision 1) Section I, pages 1 and 2; Section II, page 7; Paragraph 7.1, page 22; and Paragraph 7.1.3, page 23.

### NRC COMMENT NO. 2:

Page 11 of the Plan states that the recommendations of the appraisal will be "based upon factual evidence instead of subjective opinions." We were concerned that a narrow interpretation of "factual evidence" might preclude placing much weight on the very important subjective opinions that will result from the numerous personnel interviews. We were advised that all information gathered from the interviews will be considered "factual." This should be confirmed.

### RESPONSE:

Refer to the Program Plan (Revision 1) Section III, page 12.

### NRC COMMENT NO. 3:

Page 1 of the Plan gives the distinct impression that numerous FP&L initiatives have resulted in substantial improvements in operations at Turkey Point, but "NRC inspection activities have continued to identify breakdowns in communications and failures to comply with procedures and regulatory requirements." While these are true statements, we believe that FP&L has also identified significant problems, is greatly concerned about the "people problem" at Turkey Point, and therefore initiated the proposed Appraisal Plan. These problems should be clearly identified as FP&L concerns as well as NRC concerns.

### RESPONSE:

Refer to the Program Plan (Revision 1) Section I, page 1.

NRC COMMENT NO. 4:

It is not clear how much of the Appraisal resources will be expended at the St. Lucie site. We continue to believe that the most effective Appraisal would be obtained by (a) devoting a significant effort toward comparing St. Lucie to Turkey Point, i.e., what management programs and techniques have lead to success at St. Lucie; and (b) evaluating the corporate link between the two sites. Also, how will St. Lucie and Turkey Point findings be compared.

RESPONSE:

Refer to the Program Plan (Revision I) Section I, page 2 and Section III, page 13.

NRC COMMENT NO. 5:

We are concerned that the amount of the data proposed to be collected and computerized will be unmanageable. Also, the scope of the project seems so broad that the available time and resources might be diluted so that sufficient resources would not be available to probe already identified weak areas. This will require careful management during implementation of the program.

RESPONSE:

ENERCON has developed a system and procedures to facilitate logging, tracking, cross-referencing and overall management of significant amounts of data. They have also dedicated the resources necessary to conduct and manage a comprehensive appraisal.

NRC COMMENT NO. 6:

A process needs to be established to handle any safety matters or allegations that may be identified during the appraisal. As stated at the November 24 meeting, we will work with you in developing an appropriate process.

RESPONSE:

ENERCON, itself, is not responsible for investigating allegations of specific violations or the existence of specific safety problems. However, if an allegation is made to ENERCON of a violation or of a safety problem or possible safety problem or if ENERCON obtains information which it recognizes as falling into such a category, it will inform FPL Project Liaison. FPL Project Liaison will initiate the appropriate steps for FPL to deal with the matter by further investigating, reporting as required by regulation, etc. Refer to the Program Plan (Revision I) Section III, pages 10 and 11.



**NRC COMMENT NO. 7:**

It is not clear whether the Plan includes assessment of the effectiveness of communicating both laudable and unacceptable personnel performance to the rest of the site as "lessons learned."

**RESPONSE:**

Refer to the Program Plan (Revision 1) Paragraph 7.1.10, page 25 and Paragraph 7.2.6, page 30.

**NRC COMMENT NO. 8:**

It is not evident how evaluation of current upgrade and improvement programs are factored into the review. They are mentioned in Section III, "Appraisal Process," but are not specifically followed up in the subtasks.

**RESPONSE:**

Refer to the Program Plan (Revision 1) Section III, page 13.

**NRC COMMENT NO. 9:**

It is not clear how the items from Task 6 will be reviewed and correlated with Task 7 to identify trends and important relationships.

**RESPONSE:**

Refer to the Program Plan (Revision 1) Paragraph 7.1.1, page 22.

**NRC COMMENT NO. 10:**

The section addressing Safety Review Committees (SRC) does not indicate that the effectiveness of the SRC will be evaluated nor if any actual SRC meetings will be attended.

**RESPONSE:**

Refer to the Program Plan (Revision 1) Paragraph 7.1.6, page 24.

**NRC COMMENT NO. 11:**

The assessment of current personnel should include the effectiveness of Site and Corporate officers.

**RESPONSE:**

Refer to the Program Plan (Revision 1) Paragraph 7.1, page 22.

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100.





**NRC COMMENT NO. 12:**

The Plan identifies the various issues to be assessed. However, it does not discuss how the numerous assessments will be accomplished or against what criteria FP&L will be judged.

**RESPONSE:**

ENERCON's Appraisal Team has extensive nuclear industry experience and therefore, the basic fundamental capability to make judgements where specific criteria (such as regulations, guides, standards, INPO practices, etc.) do not exist. Furthermore, the successful operation of St. Lucie will be used as a model for comparison.

**NRC COMMENT NO. 13:**

The Appraisal should include an assessment of why many of the NRC adverse inspection findings were not previously identified by FP&L.

**RESPONSE:**

Refer to the Program Plan (Revision 1) Section III, page 13.

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