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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
 CONWAY, W.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 890201 notice of violation & forwards
 payment of civil penalty in amount of \$100,000.

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FPL

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P.O. Box 14000, Juno Beach, FL 33408-0420

L-89-84
10 CFR 2.201

MARCH 3 1989

James Lieberman, Director
Office of Enforcement
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Dear Mr. Lieberman:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Inspection Report 88-31
Response to Notice of Violation and
Proposed Imposition of Civil Penalty (EA 88-267)

This is in response to your letter of February 1, 1989, transmitting a Notice of Violation (NOV) and Proposed Imposition of Civil Penalty in connection with certain security violations at Florida Power and Light Company's (FPL) Turkey Point facility.

FPL's response is attached in the form required by the regulations of the Nuclear Regulatory Commission (NRC). The occurrence of the violations is acknowledged. The civil penalty is not contested. FPL's check in the amount of \$ 100,000.00 is enclosed.

Over the last several years FPL has made significant changes in the Turkey Point security program, invested major additional resources and upgraded physical security. Therefore, problems of the type noted in the subject NOV should not be occurring and the violation is a source of great concern to FPL's senior management.

The events appear to be unrelated, apparently caused by deficiencies in human performance, although inadequacies in procedures, related security documents and training appear to have contributed to the subject Notice of Violation. Accordingly, we cannot categorically rule out any root cause. In these circumstances it becomes necessary to probe more deeply for the source of these problems. In order to take a fresh look at the program and its management; identify opportunities for necessary improvement; underscore the personal involvement and concern of senior management and immediately tighten the control of the program, we are taking the following steps:

(1) The Corporate Manager of Nuclear Security will report directly to me until the security situation at the Turkey Point plant shows significant improvement. I intend to stay in regular communication with him during this period and closely monitor security activities.

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(2) I have convened a group of special nuclear security experts to conduct an overview of Turkey Point security activities. The group is composed of four outstanding, recognized experts in nuclear security drawn from consulting organizations and from other utilities which have proven records of outstanding performance in the security area. This group is now at the Turkey Point site and will conduct its evaluation over a period of about two weeks. They have been asked to candidly evaluate the effectiveness of the program and recommend additional measures as necessary. They are to provide a report of their review, including their recommendations to me and, as appropriate, to a Steering Committee on Nuclear Security which has been established at Turkey Point. A copy of their report will be available for NRC review. (See (3) below.)

(3) A Steering Committee on Nuclear Security chaired by the Turkey Point Site Vice President and composed of senior Turkey Point management, the Acting Vice President of Nuclear Energy and other corporate nuclear management, St. Lucie senior personnel and security contractor management has been tasked to probe for underlying weaknesses in the Turkey Point security program and to take direct action to improve its performance. They will receive and analyze data, including performance indicators. They will also provide direction to a special task force, which will be drawn from operations, maintenance and security, designed to address day-to-day security problems. The Steering Committee will report to the Senior Vice President-Nuclear. (See (4) below.)

The following additional emergency measures will be taken to assure that day-to-day security activities are under effective control:

(4) All security operations at Turkey Point will be supported by an on-site security task force composed of security, maintenance, and operations personnel. The Task Force will be supplemented by designated members of these disciplines in order to have qualified personnel on call 24 hours a day. They will be available to assist in the resolution of security problems that arise in the course of plant activities; to help in planning activities which may have an important security component; and to evaluate security events as they occur. They also will be responsible for implementing Steering Committee directives and providing information to the Steering Committee on progress in implementing this program. The involvement of operations and maintenance personnel working with security in an operational team is also intended to establish a sense of ownership and accountability for security programs throughout all departments at Turkey Point.

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(5) The Turkey Point contractor security force will be reorganized and supplemented to provide closer, direct supervision. The span of control of supervisors will be reduced to provide better oversight of all security tasks.

I believe that this five part program, combining an analysis of the existing program with emergency interim measures to deal with day-to-day security problems, will be of significant value in providing near term assistance and long term corrective action designed to improve the level of performance of the Turkey Point security program.

I wish to assure you that I am personally committed to the successful conduct and completion of each part of this program. Moreover, FPL is dedicated to achieving the goal of eliminating performance problems in its nuclear security program.

The enclosed material contains safeguards information as defined by 10 CFR 73.21; its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended. Therefore, pursuant to 10 CFR 2.790(a)(3), the enclosures are exempt from public disclosure.

Should there be any questions on this response or the corrective measures discussed, please contact us.

Very truly yours,

W. F. Conway

for W. F. Conway
Senior Vice President - Nuclear

WFC/GRM/cm

Enclosures: Attachment A
Attachment B
FPL Check No. 126600

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

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