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GOLDBERG,J.H. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
EBNETER,S.D. Region 2, Ofc of the Director

SUBJECT: Informs that util has taken several steps to upgrade security program & implementation.

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L-89-345
September 19, 1989

Mr. Stewart D. Ebneter
Regional Administrator - Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street - Suite 2900
Atlanta, GA 30323

Dear Mr. Ebneter:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Security Program Improvements

In the past year, Florida Power & Light Company (FPL) has taken several steps to upgrade the Turkey Point security program and its implementation. A number of FPL's actions have been described to you at the management meetings between FPL and the NRC, most recently during the September 19, 1989 meeting. The attachment to this letter provides a comprehensive description of the security improvements made by FPL and the performance results have been achieved.

These upgrades are being reflected in improved performance. Since early May 1989, there have been no significant problems caused by the actions of security personnel and the number of loggable security events has steadily declined during the last few months from an average of 46 per month in December 1988 through April 1989 to 35 per month during May through August 1989. In addition, the number of compensatory post hours worked has declined; since the beginning of 1989, an average of 542 compensatory post hours have been worked each month, compared to 1654 per month during 1988. (Since the beginning of April 1989, the average has been 280 compensatory post hours per month.)

In addition, FPL has hired a new Security Superintendent for Turkey Point, Mr. Franklin R. Timmons. Mr. Timmons has more than 20 years of security and law enforcement experience, including 9 years in the nuclear industry, and has successfully managed or been involved with security programs at four other nuclear power facilities. Mr. Timmons has been on site at Turkey Point since July 21, 1989, and was appointed Security Superintendent on September 1, 1989. We believe that Mr. Timmons is a strong leader who will help continue the recent good performance achieved in security.

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Please call me if you wish to discuss these matters further.

Very truly yours,

J. H. Goldberg

J. H. Goldberg
Executive Vice President

JHD/rat

Attachment

cc: Dr. Thomas E. Murley, Director, Office of Nuclear Reactor Regulation,
USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
U. S. Nuclear Regulatory Commission, Document Control Desk,
Washington, D. C.

ATTACHMENT

The actions that FPL has taken to improve security programs at Turkey Point, along with performance results that have been achieved, are described below.

An overall indicator of security performance is loggable security incidents. In general, when plant security is functioning smoothly, the number of these incidents will be low. The number of Turkey Point loggable security events has declined from an average of 48 per month in 1988 to 41 per month through August, 1989, a decrease of approximately 16%. This decrease is especially significant because it was largely achieved during a time when the security system had to cope with large numbers of craft and contractor personnel on site performing maintenance and modification work during the recent dual unit outage.

The number and frequency of incidents involving the actions of security personnel has also decreased. Since early May 1989, no significant repetition of such problems has occurred and recent NRC inspections of Turkey Point security activities (Inspection Report Numbers 89-30 and 89-33) have not identified any violations.

Specific improvements to Turkey Point security programs have been made in the following areas:

A. MANAGEMENT CHANGES

Improvements in Security Department management include:

- a new Security Superintendent who has more than 20 years of security and Law Enforcement experience, much at supervisory levels, including nine years in the nuclear industry. This individual successfully managed security programs at the Clinton and Vogtle nuclear power stations.

- an individual with successful security experience at the St. Lucie plant was appointed to the newly created position of Corporate Security Manager in July, 1988. This individual has devoted substantial time to improving security performance at Turkey Point, including serving as Acting Security Supervisor from May 8, 1989 through August 31, 1989.

- five security shift specialists were appointed to provide on-site FPL security management supervision over contractor security activities on all shifts. The full complement of these specialists has been in place since September 6, 1988, and placed on shift October 8, 1988.

These management changes add depth of experience to the security management team for Turkey Point, and provide more direct control over security contractor activities.

B. COMPENSATORY POSTS

A number of security incidents at Turkey Point have involved persons stationed at compensatory posts due to security equipment out of service. In March 1989, a task force was formed to identify ways to improve security performance, including ways to reduce compensatory post hours. The task force determined that compensatory post hours could be reduced by increasing the priority of maintenance of security hardware (see page 5), and by meeting daily with maintenance personnel to review security equipment problems. These actions were implemented in March, 1989. Additionally, in May, 1989, new security computer hardware was installed to replace older equipment with which there had been problems with reliability and spare parts availability. As a result, FPL has succeeded in reducing compensatory post hours worked from an average of 2030 hours per month during June through December 1988 to 542 hours per month in January through August 1989. (Since the beginning of April, 1989, an average of 280 compensatory post hours have been worked each month.)

C. SUPERVISOR SELECTION, TRAINING AND PROMOTION

FPL has taken several actions to improve the quality of security supervision, including:

1. In May 1989, security Sergeants, Lieutenants, and Captains were provided with supervisory skills training, including training on:
   - -supervisory style development
   - -motivating personnel
   - -management of priorities
   - -client/contractor relations
   - -constructive disciplinary procedures
   - -professional conduct/equal employment opportunities

   Based on the results of this training and feedback from participants, a training course on these topics for key security management personnel was developed and conducted on September 6-8, 1989.

2. On April 13, 1989, a new promotion policy was developed which specifies the eligibility and proficiency requirements for promotion to each level of security supervision. When a supervisory position becomes available, an interview is conducted during which a promotion board poses a series of questions to each eligible candidate who is interested in the position. This promotion policy was further expanded on July 1, 1989, to include a more comprehensive security personnel evaluation program and to better describe security personnel career paths.

3. A letter was issued on June 1, 1989 delineating the responsibilities of each group within the security organization.

4. A series of self-study and classroom training courses is being developed to prepare security personnel for supervisory positions. Prior to becoming eligible for promotion to sergeant, lieutenant or captain, an individual must complete certain prescribed courses, including courses on leadership as well as specific courses dealing with the particular responsibilities of each level of supervision.

D. TRAINING FOR SECURITY OFFICERS

The training curriculum has been substantially revised, and now includes a total of approximately 240 hours of training, of which 30% is classroom training and 70% is field training that is directly related to the practical aspects of performing key security tasks. This training includes:

- demonstrations of access control techniques at actual site entry barriers;
- simulated patrols;
- simulated alarm responses;
- demonstrations of observation tower techniques;
- demonstrations of search techniques; and
- demonstrations of vehicle escort techniques.

During this training, trainees are required to perform simulations of these tasks themselves, and are critiqued on their performance by instructors.

E. FIELD PERFORMANCE EVALUATIONS

A trial program for field evaluation of security personnel was implemented in February 1989. This program tests the performance of security personnel, on an unannounced basis, in simulated security situations. Examples include:

- requests made for incorrect badge number or a badge with a picture that does not match the requestor;
- security alarms in various plant areas and response by security personnel;
- access to the vital area with an improper badge;
- establishment of compensatory posts;
- attempted introduction of contraband into the protected area;
- security barrier degradation (simulated hole in fence).

Individuals are rated on the quality of their response and are critiqued and coached by evaluators to improve their performance. Implementation of this program on a permanent basis will occur by the end of 1989.

F. SECURITY FORCE TURNOVER

A survey was performed of security personnel to determine the reasons for excessive turnover. Survey results indicated the following as possible causes:

- °Perceived supervisory insensitivity
- °Lack of a clear promotion policy
- °High overtime

Action has been taken to address each of these concerns:

- -Supervisors were given training on personnel handling and sensitivity to employee concerns, which was completed in early May, 1989. In addition, a security team was formed on July 6, 1989 which meets weekly to address security force members' concerns. The team includes elected security force members from each shift, a contractor shift supervisor and management representative, and an FPL security shift specialist. Minutes of each meeting are kept and each concern is documented and the reasoning behind the disposition of the concern is provided.

- -The security force contract was changed effective July 24, 1989 to provide for increased medical, dental and retirement benefits; the new contract also provides financial incentives for remaining with the security force and bonuses for outstanding performance. Performance ratings are based upon personnel errors leading to loggable or reportable events, lost time due to accidents, attendance, and disciplinary actions.

- -As noted on page two, a new security contractor promotion policy was issued on April 13, 1989 which establishes clear promotion eligibility criteria and standards for choosing individuals to be promoted. This policy is now being enhanced to include better performance evaluation methods.

- -Overtime has been reduced during the last several months, from an average of 19.8% per month during 1988 to 15.9% per month to date during 1989. A goal of 15% overtime has been established.

To date, these actions have had only moderate effect on turnover rates; however, a number of these actions were instituted only very recently, and FPL expects turnover levels to decline in the next several months.

G. SECURITY HARDWARE UPGRADES

FPL is proceeding with substantial upgrades to the security system. These upgrades will simplify security boundaries, reduce the need for compensatory and other manual security posts (including towers), and improve the reliability of security hardware. Components of the program include:

- New protected area perimeter fences;
- New electronic primary intrusion detection systems;
- Fixed closed circuit television cameras that will replace existing fencing and defensive positions (towers);
- Revision of the protected area boundary to exclude the two fossil fired generating units at the Turkey Point plant; and
- Construction of a new centralized access facility.

In general, engineering studies and scheduling of installation for these upgrades has been completed; installation of the upgrades is scheduled to be finished by the end of December 1991. Construction is now underway on a bridge and roadway modifications that will permit reconfiguration of the protected area boundary.

H. CONTINGENCY RESPONSE PROGRAM

On July 5, 1989, individuals selected to make up dedicated contingency response teams began receiving special training on response to identified threats, including training on sealing off intrusion areas, coordinating and performing area searches, detention of intruders, and communication during incident response. Teams for each shift were formed on July 17, 1989. Response team members are scheduled to undergo comprehensive Strategic Reaction Team (SRT) training next year. There is an active program on all three shifts to conduct contingency drills to permit us to implement training concepts that are being taught.

I. MAINTENANCE OF SECURITY HARDWARE

A maintenance crew has been dedicated to servicing security equipment in order to reduce equipment down time. Also, security maintenance items that require compensatory measures have been upgraded from priority level A2, which allows 48 hours for work to be performed, to priority level A1, which requires that work be performed within 24 hours. The success of this approach in keeping security equipment available is reflected in the lower number of compensatory post hours (see page 2).

J. COORDINATION OF MAINTENANCE ACTIVITIES

Efforts have been made to assure that maintenance personnel are aware of their security responsibilities during the performance of their work, and to coordinate maintenance planning with site security so that appropriate security arrangements can be made to accommodate maintenance work. Personnel in each of the Maintenance disciplines have been briefed on their security responsibilities by the Security Supervisor. A Security representative attends the morning Plan of the Day meetings at which maintenance and other significant site activities are scheduled. This participation permits Security to anticipate and prepare for site activities that may require additional or modified Security coverage.

K. UPGRADED SECURITY ORIENTATION TRAINING

Security Orientation Training (SOT) for all personnel badged to enter the Turkey Point Vital or Protected areas has been revised to provide in-depth instruction on each person's security responsibilities. SOT now includes instruction on:

- access control process
- escort responsibilities
- reaction to unbadged/improperly escorted persons
- notification of security when assistance is needed

This training emphasized that plant security is the responsibility of all site personnel, not just the security department.