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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
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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: Responds to SALP Repts 50-250/89-36 & 50-251/89-36 for period Jul 1988 - Jul 1989.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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**FPL**

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

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

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Inspection Report No. 89-36  
Response to Systematic Assessment  
of Licensee Performance

Dear Mr. Ebnetter:

Florida Power & Light Company (FPL) has reviewed the NRC Systematic Assessment of Licensee Performance (SALP) Report for Turkey Point covering the period July 1, 1988 to July 31, 1989, and generally agrees with the facts and conclusions in the report. Considerable effort has been devoted to improving performance at the Turkey Point plant, and FPL appreciates the recognition of this fact in the SALP report.

As I stated at the October 26, 1989, meeting at which the SALP results were discussed, we regard the performance achieved thus far as a beginning; continued improvement will require sustained effort. We will maintain the strong management oversight recognized in the SALP report and systematically address the weaknesses which were noted. We will keep the NRC apprised of our progress.

The comments on the SALP report in the Attachment highlight areas in which there have been significant measurable improvements since the close of the SALP period. We will be glad to discuss these comments at your convenience.

Very truly yours,

J. H. Goldberg  
Executive Vice President

Attachment

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

an FPL Group company

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## ATTACHMENT

The October 19, 1989 SALP report for Turkey Point (Inspection Report 89-36) identified specific areas where performance could be improved, and in some cases made recommendations for improvement. In a number of these areas, significant improvement has occurred since the end of the SALP period (July 31, 1989). These improvements include:<sup>1</sup>

### RADIOLOGICAL CONTROLS

o Number of Containment Entries While at Power (p. 12).

The number of containment entries while at power has decreased from a total of 64 in July 1989 (for both units) to 20 in October 1989.

o Contaminated Floor Space (p. 12).

The amount of contaminated floor space has been reduced from 18,149 feet (18.6%) in July 1989 to 15,205 feet (15.6%) as of October 31, 1989.

o Personnel Contamination Events (p.13).

There were 384 Personnel Contamination Events (PCEs) during 1988. As of October 31 there were 147 PCEs during 1989. It is expected that the total number of PCEs for 1989 will be less than half that experienced during 1988.

o Cumulative Dose (Person-rem) (p.13).

The cumulative dose for both Turkey Point units was 671 person-rem for 1988 (measured by TLD). As of September 30, the cumulative dose for 1989 was 382 person-rem. The projected total 1989 cumulative dose is 454 person-rem, a decrease of about one-third from the 1988 level.

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<sup>1</sup>Page references are to pages in Inspection Report 89-36



## MAINTENANCE

### Overtime and Turnover Rates (p.14).

Overtime and Turnover rates in the maintenance disciplines generally have declined since July 1989. Average overtime rates in each discipline during 1989 have been as follows:

	<u>1st Quarter</u>	<u>2nd Quarter</u>	<u>3rd Quarter</u>
Mechanical	46.3%	23.3%	16.7%
Electrical	53%	31.7%	30.0%
I&C	46%	36.3%	26.3%
All Maintenance (includes Reliability Group)	46%	30.3%	21.3%

Turnover rates have been:

	<u>May - July 1989</u>	<u>August - October 1989</u>
Mechanical	8.7%	1.1%
Electrical	1.6%	3.3%
I&C	4.9%	3.7%
All Maintenance (includes Reliability Group)	6.0%	3.1%

### Corrective Maintenance Backlog (p. 15).

The corrective maintenance backlog has declined from 1056 Plant Work Orders (PWOs) as of July 31, 1989 to 870 PWOs as of October 31, 1989. The backlog had reached a low of 708 on September 15, 1989; the increase since that time is primarily due to PWOs initiated to implement material upgrades.

### Control Room Deficiency Tags (p. 15).

The number of control room deficiency tags has declined from 95 as of July 31, 1989 to 68 as of November 15, 1989.

### Spare Parts (p.16).

Significant improvements are evident in performance indicators related to spare parts. Average procurement times have declined from 96.2 days during October 1988 - March 1989 to 79.1 days during April - September 1989 (a decrease of approximately 18%). The number of stores parts below minimum stocking levels has been reduced from 5154 as of May 1, 1989 to 4509 as of October 1, 1989 (a 12.5% reduction). The proportion of procurement requests made on an "urgent" basis has fallen from an average of 39% during February - May 1989 to 29% during June - September 1989.

### Quality of Procedures (pp. 16-17).

The number of Maintenance On-The-Spot-Changes (OTSC's) to procedures has declined substantially in recent months, from an average of 57.2 per month during January - April 1989, to an average of 12.5 during May - October 1989. Higher figures early in the year were in part due to the amount of outage work being performed.

o Tracking and Analysis of Causes for Rework (p.17)

In September 1989, a rework Maintenance Engineer position was designated for each discipline in the Turkey Point Maintenance Department. In the I&C and Electrical departments, Engineers have been assigned responsibility for analyzing the root causes of rework items and for recommending corrective action to prevent recurrence. An offer is being tendered to an individual to fill the Mechanical Engineer position. The required administrative processing of this individual should be completed by March 31, 1990. A revision to the Turkey Point root cause analysis procedure (ADM-509) to reflect this change has been issued.

SECURITY

o Attentiveness to Duty/Compensatory Posts (p. 20)

Since early May 1989, there have been no identified instances of sleeping or inattentiveness to duty by Turkey Point security personnel. The average number of compensatory post hours worked per month has declined from an average of 1183 hours during October 1988 - March 1989 to an average of 236.5 hours during April - October 1989.

o Security Shift Supervision/Loggable Events

Since October 1988, five FPL security shift specialists have provided FPL management supervision of contractor security personnel on each shift. During this time, the number of loggable security events has declined, from an average of 49.3 per month during June through December 1988 to an average of 38.2 per month during January - October of 1989, a 22.5 % decrease. During July - October, 1989, the average number of loggable security events has been 26.25 per month.

ENGINEERING/TECHNICAL SUPPORT

o Design - Related ALARA Training (p.22)

On May 1, 1989 two ALARA coordinators, one for St. Lucie and one for Turkey Point, were assigned within the FPL Nuclear Engineering organization. These coordinators are responsible for the development of ALARA design standards for the FPL Nuclear Engineering organization, and for assuring that ALARA considerations are properly accounted for in plant design work. In addition, these individuals are developing an ALARA training program for design engineers. This training is scheduled to be implemented during the first quarter of 1990.

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