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SUBJECT: Requests termination of 860812 confirmatory order re plant performance enhancement program.

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

DECEMBER 2 1 1989

L-89-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Performance Enhancement Program

The Turkey Point Performance Enhancement Program (PEP) was established in early 1984 to address performance issues and to upgrade operations to meet corporate and regulatory requirements. Additional tasks were added to the program later that year to enhance testing of plant components, and in 1986 to improve design and system configuration control. The program is the subject of a confirmatory order dated August 12, 1986.

The purpose of this report is to request termination of the order in accordance with the provisions of Section IV of the order. It is our judgement that the few remaining tasks can be followed by existing mechanisms and that the management controls provided by the formal PEP are no longer necessary. A listing of remaining PEP tasks and open issues is provided in Attachment 1 to this letter along with several requests for program modifications (Attachment 2).

Should you have any questions on our request, please contact us.

Very truly yours,

J. H. Goldberg
Executive Vice President

JHG/PLP/gp

Attachments

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

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ATTACHMENT 1

STATUS OF REMAINING PEP PROJECT SUBTASKS

PEP Project	Sub task	Item	Status	Control System
2(Operations)	1.3	Adjust shift compliment.	QA audit finding to provide 6 shifts	QA audit "QAS-PEP-88-1" finding 1 tracks this issue. Scheduled for completion by 12/90 due to testing for Group XIII.
4 (Configuration Control)	11.0	Select System Review		
		1. Resolution of SEG open items. Review various SEG Items for work off priority.	Expected Completion 6/90	IFI 89-203-01 (NRC Design Validation Inspection)
		2. Replace RHR 887 Valve/ IS MOD 519 Unit 3 IS MOD 565 Unit 4	Expected Completion End of Cycle 12 - 5/90 End of Cycle 13 - 10/91	IFI 89-203-03
		3. Install redundant EDG Air Start Motor, IS MOD 576.	Expected Completion 10/91	IFI 89-203-03
		4. Resolve Select System Punchlist.	Expected Completion 6/90	IFI 89-203-04
		5. Resolution of Design Basis Document (DBD) verification open items. Involves closing approximately 230 items resulting from DBD verification effort.	Expected Completion 5/91	IFI 89-203-05
		6. Resolution of Breaker List. IS MOD 1265	Expected Completion 1/91	IFI 89-203-06

PEP Project	Sub task	Item	Status	Control System
4 (Configuration Control) con't		7. P&ID Walkdowns of ARMs/PRMs/NCCs inside Unit 3 containment. Identify P&ID discrepancies on NCRs. IS Mod 1042	Expected Completion 5/90	IFI 89-203-07
		8. Resolution of P&ID walkdown discrepancies.	Expected Completion 9/90	IFI 89-203-07
		9. Review Control of Vendor Manuals.	Expected Completion 1/91	IFI 89-203-09
		10. Upgrade Small Bore Piping to FSAR Standards. IS MOD 1313 Unit 3, IS MOD 1314 Unit 4 [See Note below]	Expected Completion 10/91	IFI 89-203-08
5(Training)	1.2	Performance based training for maintenance journeymen and foremen and chemistry technicians.	Open item from NRC Inspection Report 89-41	N/A - see Attachment 2 for request to modify program.
	1.3	Performance based training for reactor engineering, technical department and quality control.	Open item from NRC Inspection Report 89-41	N/A - see Attachment 2 for request to modify program.

Note: Other non-PEP open items from the NRC Design Validation Inspection (Inspection Report 89-203) will be addressed in the FPL response requested by that report.

ATTACHMENT 2

REVISION/CLARIFICATION OF PEP PROJECT 5, SUBTASKS 1.2 AND 1.3 AND PEP PROJECT 6, SUBTASK 9.1

PROJECT 5, SUBTASK 1.2

Background:

PEP Project 5, Training, Subtask 1.2 provides for the development of performance-based training programs for maintenance journeymen and foremen/chiefs. The intent of the commitment was to develop a single training program applicable to both of these groups; however, as worded, the commitment could be interpreted to require separate training programs for each group. FPL has developed a single program applicable to both journeymen and foremen/chiefs, and this program has been accredited by INPO.

Request:

FPL requests that the program of performance-based training developed for maintenance journeymen and foremen/chiefs be accepted as satisfying Project 5, Subtask 1.2 and that this subtask be closed.

PROJECT 5, SUBTASK 1.3

Background:

PEP Project 5, Training, Subtask 1.3 provided for developing performance-based training for certain reactor engineering, technical department, and quality control personnel. Initially, it was anticipated that INPO accreditation would be provided for training programs in each of these areas. However, FPL was subsequently informed that INPO accreditation would be provided only for technical staff and managers and shift technical advisors.

Appropriate personnel from reactor engineering, technical department, and quality control are included within the scope of the INPO-accredited program, but this program does not include all the personnel from these groups that were initially envisioned.

On March 12, 1985, FPL sent a letter to the NRC describing changes to Subtask 2.3 which reflected our understanding of the accredited INPO program and indicated that FPL would use that program. The letter did not make clear that a corresponding change to subtask 1.3 would be necessary to support that accreditation.

However, since the purpose of Subtask 1.3 is to develop programs meeting the INPO accreditation guidelines, we believe that the program developed, which has been accredited by INPO and which provides training to appropriate personnel within the groups listed in Subtask 1.3, meets the intent of the commitment.

Independent of the PEP, a training program for reactor engineering has been developed and implemented. Furthermore, independent of the PEP Level I, II and III certification requirements for our QC inspectors are provided in plant procedures, and additional training for QC inspectors is provided on an as needed basis.

Request:

FPL requests that the performance-based training program developed and implemented for technical staff and managers and for shift technical advisors be accepted as satisfying Subtask 1.3 and that this item be closed.

PROJECT 6, SUBTASK 9.1

Background:

PEP Project 6, Management Action Plan, Subtask 9.1 provides an action in the area of senior management control to continue to conduct Quality Assurance Committee meeting on a semi-annual basis. This subtask was established to meet the program objective to expand corporate management involvement and oversight of the operating plants.

Request:

In order to consolidate oversight activities, FPL requests this task be modified so the oversight function be performed by the Company Nuclear Review Board (CNRB). Because of the senior level of the members on the CNRB, and the current CNRB Technical Specification responsibility for cognizance over QA audits of facility activities, we have determined that an equivalent level of management oversight will be maintained for this activity by transferring responsibility to the CNRB.