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October 21, 1992

Mr. James Taylor-
Executive Director of Operations, or
Dr. Thomas E. Murley
Director of Nuclear Reactor Regulations
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs

This letter represents an addendum to the 10CFR2.206 I filed on October 15, 1992 in record in your offices. The following are related concerns to be included:

- 1)- FPL Management violated Emergency Procedures, in addition to previously documented violations of technical specifications and Design Bases during its response to hurricane Andrew. EPIP-20106 calls for shutdown cooling both units to at least mode 4 within 2 hours to the projected onset of sustained force winds at the site. Unit 4, however, did not reach mode 4 until 4:05 AM on 8/24/92. At 5:50 AM the National Hurricane Center in Coral Gables recorded a one minute average wind speed of 140 MPH.
- 2)-Automatic security systems were compromised (ref-Damage Assessment R Conway, Westinhouse letter of 8/25/92). Mr. Gene Hutchinson, former plant crane operator, has presented a formal complaint to USNRC regarding a series of incidents where possibly contaminated/radioactive cable was removed out of the plant illegally with possibly criminal intents to sell this material to scrap yards for recycling. Mr. Hutchison has stated to the press that security at Turkey Point is defective from the inside out. Palm Beach Post reported the enclosed story, soon after Andrew, of cables being stolen from a "compound in Dade County south of the city...that was damaged by hurricane Andrew... Florida City", and the selling of 1544 pounds of wire to a metal recycling center (scrap metal yard) in Lelray Beach. Were the health or safety of our community compromised as well by this? What is the nature of the criminal or negligent security infringements at Turkey Point? Has selling of possibly contaminated or radioactive materials to scrap yards that may eventually convert them into recycled consumer products (pots and pans?) been taking place? Why has our community not been informed?
- 3)- In addition to failures in the black start diesel generator, failures occurred as well in both units' redundant diesels 3A and 4A. 4A was incapacitated for at least 3 minutes due to ground isolation problems (11:57 to 12:00 on 8/24/92). This calls into doubt not just the overall reliability of the diesels, but

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Addendum to 10CFR2.206 RDR

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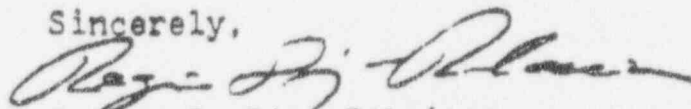
also specific aspects of systemic vulnerability such as weaknesses of the ground detection and isolation mechanisms and instrumentation for many Turkey Point systems including RHR, Safeguards, OMS, etc. The NRC is aware of this problem. Again, on 8/27/92 the 3A EIG was lost due to alleged generator lockout.

4)-Page 3 of the FPL presentation in support of the meeting between FPL Management and NRC held on 9/10/92 (letter, 9/17/92, E.W. Merschoff) states "Radiation Monitoring Stack-Instrumentation and minor stack foundation damage". Radiological Assessment teams were not sent out until 8:01 on 8/24/92. Was possible radiological exposure not monitorable, or inadequately monitorable during a significant time period?

5) In the light of the poor response by the nuclear units at Turkey Point to hurricane andrew events, and post-hurricane startup attempts that failed with further violations of technical specifications, which have been documented, should the adequacy of the design bases and technical specifications of Turkey Point be re-evaluated to assure the maintenance of an adequate margin of safety?

6)- Turkey Point nuclear units are unique throughout the Nation in sharing common features and systems with its adjacent fossil units. This interdependence has been decreased throughout the years, but still entails the sharing of a common geographical, physical location. The experience of Hurricane Andrew indicated potential vulnerabilities caused by this interaction. For example, the collapse of boiler stacks, the collapse of oil tanks being ruptured, etc. Has the potential for accidents in the Fossil side, or the non-safety side of the nuclear units adversely affecting the containment structures or any nuclear safety related systems been properly evaluated in the light of this new experience?

Sincerely,



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clear Regulatory Commission, which regulates U.S. nuclear plants, and refer to a "nothing can go wrong" attitude at the NRC. But Kerry Landis, section chief of reactor projects, said the NRC had two people onsite during the hurricane "watching what was going on."

All of the safety systems functioned properly," Landis said. Landis said the NRC is evaluating the interim fire protection system FPL installed for the startup of Unit 4. "If we find any problem, we have the authority to stop them," Landis said.

But the protest groups, which claim more than a million members, questioned whether residents who live near Turkey Point would have been able to evacuate amid the post-storm debris if a nuclear accident had occurred.

"The best defense there is to make sure the accident doesn't take place," Landis said. "That's what happened here."

Landis said, revising its gloomy estimate of 1.4 percent. "The time between now and the Nov. 3 election is mostly time for the government to make sure the accident doesn't take place," Landis said. "That's what happened here."

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MORE BUSINESS NEWS

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"I can't see how the impression could possibly change before the election," said economist Paul W. Boltz of T. Rowe Price Associates in Baltimore.

Next week, the Labor Department reports on September's unemployment rate.

Many economists fear the id of a federal summer-job program for teenagers and job losses from the hurricane will cause an increase from the 7.6 percent August rate.

On Oct. 27, only a week before Election Day, the government releases its first estimate of GDP in the July-September period.

Men charged with stealing FPL material

Palm Beach County Sheriff's deputies have charged a Delray Beach man and his son with selling more than 3,200 pounds of copper wire stolen from a Florida Power & Light Co. compound in Dade County that was damaged by Hurricane Andrew.

The arrests add to a growing number of people charged with stealing FPL materials and hampering the company's efforts to repair damaged lines.

Since the storm, authorities have arrested between 15 and 20 people and charged them with stealing material from the company, spokesman Bill Swank said. Swank could not estimate the amount stolen but said it has stalled repair work.

Deputies received a tip last week that

Robert Post Sr., 50, and his son, Robert Post Jr., 31, were stealing wire in Dade County and selling it farther north.

On Sept. 4, members of the department's tactical unit followed the men to Florida City where they watched them take 1,688 pounds of wire from a compound south of the city. Detective Mike Mauro said. The team followed the two men north, where they watched them sell the wire to Metal Recycling of Delray Beach, he said.

The day before, they sold 1,644 pounds of wire to the same company, which then sold it to a Miami scrap yard, Mauro said.

Both men have been charged with two counts of dealing in stolen property and carrying a concealed weapon.

Witness
Hurricane damaged protection systems at FPL's

