



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931

January 15, 2004

Florida Power and Light Company
ATTN: Mr. J. A. Stall, Senior Vice President
Nuclear and Chief Nuclear Officer
P. O. Box 14000
Juno Beach, FL 33408-0420

SUBJECT: TURKEY POINT NUCLEAR PLANT - NRC EXAMINATION REPORT
05000250/2003301 AND 05000251/2003301

Dear Mr. Stall:

During the period December 3-11, 2003, the Nuclear Regulatory Commission (NRC) administered operating examinations to employees of your company who had applied for licenses to operate the Turkey Point Nuclear Plant. At the conclusion of the examination, the examiners discussed the examination questions and preliminary findings with those members of your staff identified in the enclosed report. The written examination was administered by your staff on December 15, 2003.

Nine Senior Reactor Operator applicants passed both the written and operating examinations. One Senior Reactor Operator applicant failed the overall portion of the written exam. There were three post examination comments submitted. The NRC post examination comment resolutions are included in this report as Enclosure 2.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact me at (404) 562-4638.

Sincerely,

/RA/

Michael E. Ernstes, Chief
Operator Licensing and
Human Performance Branch
Division of Reactor Safety

Docket Nos. 50-250, 50-251
License Nos. DPR-31, DPR-41

Enclosures: (See page 2)

- Enclosures: 1. Report Details
2. NRC Resolutions to Turkey Point's Initial SRO Post Exam Comments

cc w/encls:

T. O. Jones
Site Vice President
Turkey Point Nuclear Plant
Florida Power and Light Company
Electronic Mail Distribution

Walter Parker
Licensing Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
Electronic Mail Distribution

Michael O. Pearce
Plant General Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
Electronic Mail Distribution

Don Mothena, Manager
Nuclear Plant Support Services
Florida Power & Light Company
Electronic Mail Distribution

Rajiv S. Kundalkar
Vice President - Nuclear Engineering
Florida Power & Light Company
Electronic Mail Distribution

M. S. Ross, Attorney
Florida Power & Light Company
Electronic Mail Distribution

Linda Tudor
Document Control Supervisor
Florida Power & Light Company
Electronic Mail Distribution

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, FL 32304

William A. Passetti
Bureau of Radiation Control
Department of Health
Electronic Mail Distribution

County Manager
Metropolitan Dade County
Electronic Mail Distribution

Craig Fugate, Director
Division of Emergency Preparedness
Department of Community Affairs
Electronic Mail Distribution

Curtis Ivy
City Manager of Homestead
Electronic Mail Distribution

Mr. McHenry Cornel
Training Manager
Turkey Point Nuclear Plant
9760 SW 344th Street
Florida City, FL 33035

FP&L

Distribution w/encl:

E. Brown, NRR

C. Evans (Part 72 Only)

L. Slack, RII EICS

RIDSNRRDIPMLIPB

PUBLIC

OFFICE	RII:DRS	RII:DRS	RII:DRS	RII:DRS	RII:DRP		
SIGNATURE	/RA By T. Kolb for/	/RA/	/RA/	/RA/	/RA/		
NAME	RAiello:pmd	TKolb	RBaldwin	MErnstes	JMunday		
DATE	1/13/04	1/13/04	1/14/04	1/15/04	1/15/04	1/ /2004	1/ /2004
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO
PUBLIC DOCUMENT	YES NO						

OFFICIAL RECORD COPY

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML040150509.wpd

NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.: 50-250, 50-251

License Nos.: DPR-31, DPR-41

Report Nos.: 05000250/2003301, 05000251/2003301

Licensee: Florida Power & Light Company

Facility: Turkey Point Nuclear Plant, Units 3 & 4

Location: 9762 S. W. 344th Street
Florida City, FL 33035

Dates: Operating Tests - December 3-11, 2003
Written Examination - December 15, 2003

Examiners: R. Aiello, Senior Operations Engineer
R. Baldwin, Senior Operations Engineer
T. Kolb, Operations Engineer

Approved by: M. Ernstes, Chief
Operator Licensing and Human Performance Branch
Division of Reactor Safety

SUMMARY OF FINDINGS

ER 05000250/2003-301, 05000251/2003-301; 12/3-15/2003; Turkey Point Nuclear Plant, Units 3 & 4; Licensed Operator Examinations.

The NRC examiners conducted operator licensing initial examinations in accordance with the guidance of NUREG-1021, Draft Revision 9, "Operator Licensing Examination Standards for Power Reactors." This examination implemented the operator licensing requirements identified in 10 CFR §55.43 and §55.45.

The NRC administered the operating tests during the period of December 3-11, 2003 to ten applicants. Members of the Turkey Point Nuclear Plant training staff administered the written examination on December 15, 2003. The operator licensing initial written examination was developed by the NRC. The operating tests and outlines were developed by the Turkey Point training staff. Nine Senior Reactor Operator (SRO) applicants passed the operating and written examinations. Four of these applicants were issued SRO licenses, the other five will be issued SRO licenses when the NRC is notified that their requirements for time-on-site are met. One SRO applicant passed the operating examination but failed the overall portion of the written examination.

No significant issues were identified.

Report Details

4. OTHER ACTIVITIES (OA)

4OA5 Operator Licensing Initial Examinations

a. Inspection Scope

The NRC and the licensee developed written and operating examinations respectively in accordance with the guidelines specified in NUREG 1021, "Operator Licensing Examination Standards for Power Reactors," Draft Revision 9. The NRC examination team reviewed the proposed examination. Examination changes agreed upon between the NRC and the licensee were made according to NUREG-1021 and incorporated into the final version of the examination materials.

The examiners reviewed the licensee's examination security measures while preparing and administering the examinations to ensure examination security and integrity complied with 10 CFR 55.49, Integrity of examinations and tests.

The examiners evaluated ten Senior Reactor Operator (SRO) applicants who were being assessed under the guidelines specified in NUREG-1021. The examiners administered the operating tests during the period of December 3-11, 2003. Members of the Turkey Point Nuclear Plant training staff administered the written examination on December 15, 2003. The evaluations of the applicants and review of documentation were performed to determine if the applicants, who applied for licenses to operate the Turkey Point Nuclear Plant, met the requirements specified in 10 CFR Part 55.

b. Findings

No findings of significance were identified.

The licensee's operating examination submittal was within the range of acceptability expected for a proposed examination. Nine SRO's passed both the operating and written examinations. One SRO applicant passed the operating examination, but failed the overall portion of the initial written examination. The licensee submitted three post examination comments concerning the written examination. The written examination and answer key, licensee's post examination comments, and the NRC post examination comment resolutions, may be accessed in the ADAMS system (ADAMS Accession Numbers, ML040120613, ML040130215).

40A6 MeetingsExit Meeting Summary

On December 11, 2003, the examination team discussed generic issues with Mr. Terry Jones and members of his staff. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

Licensee personnel

R. Bretton, Operations Continuing Training Supervisor
M. Cornell, Training Manager
T. Jones, Site Vice President
M. Laca, Operations Manager
G. Laughlin, Operations Training Manager
B. Stamp, Operations Supervisor
G. Warriner, Site Quality Manager

NRC Resolutions to Turkey Point's Initial SRO Post Exam Comments

1. Question #1

Facility Comment: The licensee requests that either "B" or "C" response be accepted as correct. "C" is correct per the answer key and is documented in BD-ONOP-003.6, Loss of 120V Vital Instrument Panel *P06, Page 6. The licensee contends that "B" is also correct based on a CAUTION on page 22 of 3-ONOP-003.6, Loss of 120V Vital Instrument Panel 3P06, which states *"Pressurizer level should be monitored closely on the operable instrumentation during performance of the following steps to avoid uncovering the pressurizer heaters or causing a high level trip."* The licensee states that the "following steps" referred to in the CAUTION are associated with maintaining pressurizer level and pressure. Finally, either event (PORV cycling or reactor trip on high level) is undesirable and the procedure gives guidance to minimize charging flow to preclude both.

NRC Resolution: Recommendation is not accepted. Response "C" is the only correct answer. This answer is supported by the basis document BD-ONOP-003.6, which states for step 3.a (reducing charging flow): "Minimizing the fill rate of the pressurizer will extend the time frame for recovery without lifting a PZR PORV due to compressing the bubble."

Response "B" is incorrect because it is not the basis for reducing charging flow. 3-ONOP-003.6 step 3.a is used to "Control Pressurizer Pressure" by reducing charging flow to minimum. This is the only place in the procedure that gives direction for reducing charging flow. Although answer "B" is an effect of reducing charging flow, reducing charging flow is not directed by the procedure to control pressurizer level, but to control pressurizer pressure. The chart submitted by the licensee (IC 6, Loss of 3P06) shows that the immediate concern is pressurizer pressure (PORV lifts 3 or more times prior to PZR level reaching the reactor trip setpoint) with the pressurizer level a concern much later in the scenario. Therefore, reducing charging flow has the immediate effect of extending the time before the pressurizer PORV lifts due to compressing the bubble.

Regarding the CAUTION mentioned by the licensee (3-ONOP-003.6, Attachment 4, page 22), this CAUTION applies to the steps following it (restore pressurizer heaters, restore letdown) and there is nothing in these follow-on steps that directs reducing charging flow. This CAUTION does not apply to step 3.a in the main body of the procedure.

2. Question #33

Facility Comment: The licensee proposes that the one applicant's answer key be changed to the answer choice that he circled on his exam question page, vice the answer that he filled in on his answer sheet. The licensee has maintained positive control of the original exam question page from the time that the applicant turned in his exam and states that the individual applicant hasn't had access to the original exam question page.

NRC Resolution: Recommendation is not accepted. During Prep week (Nov. 5, 2003) the Chief Examiner and Chief Examiner Under Instruction met with the applicants and members of the training center that were involved with the exam and covered the items in NUREG-1021, Appendix E, "Policies and Guidelines for Taking NRC Examinations" verbatim. Specifically, Part B, item 6, states "Mark your answers on the answer sheet provided and do not leave any question blank." We gave an example that "E" had been marked in the past when the individual meant to mark "D". (Note: each answer on the answer sheet has the letter choice inside a "bubble", which should aid the applicants in ensuring that their filled in answer choices on the answer sheet coincide with their intended correct answer selection.)

We re-iterated to the applicants to pay attention to detail and that if time was available, to verify that his intended correct answer choices were properly filled in on his answer sheet. The individual applicant who is the subject of this post-examination comment turned in his exam with approximately 3 hours left to finish the exam. This indicates that there was ample time for this applicant to ensure that he properly filled in the answer sheet consistent with his intended correct answer choices.

However, in consideration of the licensee's post-examination comment, the NRC reviewed for consistency how the applicant marked up ALL of the questions on his original exam question pages versus how the applicant filled in his ENTIRE original answer sheet. What was found was a lack of consistency:

- 2 questions had no answers circled on his exam question pages, but one answer for each question was filled in on his answer sheet;
- 4 questions had two answers circled on his exam question pages with no indication of which answer the applicant preferred, but only one answer was filled in for each question on his answer sheet; and
- 2 questions had the correct answer circled on his exam question pages, but another answer was filled in for each question on his answer sheet.

These inconsistencies serve as further justification for not re-grading the applicant's examination based on how the applicant marked up his exam question pages in lieu of the *official* filled in answer sheet of record as required by ES-403 of NUREG-1021. This applicant's exam will therefore be graded only based on his filled-in answer sheet of record in accordance with NUREG-1021.

6. Question #46

Facility Comment: The licensee requests that either "C" or "D" response be accepted as correct. The licensee states that ONOP-050, Loss of RHR, establishes conditions for natural circulation and that these same actions also remove the last restriction for starting a Reactor Coolant Pump (RCP). They also state that natural circulation is the preferred method of heat removal until the process of starting an RCP is complete. Then the preferred method will be forced circulation via the running RCP.

NRC Resolution: Recommendation is not accepted. The stem states that RCS temperatures are increasing and that the secondary water temperatures are 20°F higher than RCS cold leg temperatures. Per ONOP-050, Loss of RHR, step 22, you establish conditions for natural circulation which can be done based upon the conditions given in the stem of the question. Later in the procedure (step 27) there is direction to check if an RCP can be started. Per the conditions in the stem the conditions for starting an RCP cannot be met so this option is not available. Note that the stem of this question specifically asks: "...preferred method for heat removal **under these conditions...**" (emphasis added).

The licensee stated in the post exam comments that "Natural Circulation is the preferred method of heat removal" until an RCP can be started, which cannot be done until any S/G secondary water temperature is $\leq 10^{\circ}$ F above any RCS cold leg temperature. Since the stem states "B and C S/G secondary water temperatures are 20°F higher than RCS cold leg temperatures" that leaves the only correct answer as "C".