

From: Kathleen O'Donohue, R.D.
To: Ogle, Charles R., R.D.
Date: 3/23/04 8:58AM
Subject: final rev

Note: I renumbered the concerns to get them in the better order, the second interface date was added and I deleted the reference to the other CRs, we did not really need to mention them.

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ALLEGATION EVALUATION REPORT

ALLEGATION RII-2004A-0013

Turkey Point Nuclear Plant

Concern (2)

This concern refers to your conversation with Mr. Necota Staples of the U.S. Nuclear Regulatory Commission (NRC) on January 28, 2004, at the Turkey Point Nuclear Plant (TP). You expressed concern to Mr. Staples regarding the licensee's disposition of a fire protection issue, which was identified at the Turkey Point Nuclear Plant in Condition Report (CR) [REDACTED]

Discussion:

In response to your concern, the inspectors performed a review of O-ADM-518, Condition Reports and NAP-400 Revision 1, Condition Reports for Turkey Point Nuclear Plant, to assess whether or not the licensee's closure of CR [REDACTED] was in accordance with plant procedures. The inspectors also reviewed the circumstances associated with the licensee's investigation and disposition of the issue. 76

The inspectors determined that CR [REDACTED] appropriately classified the issue which [REDACTED]. Further, the licensee's investigation, conclusions, and corrective actions appeared to be within the CR process. The inspectors verified that an independent review of the CR took place, the response was timely, and consistent with the disposition of other CRs reviewed by the inspectors. 76

Conclusion:

Based on the information provided by the licensee and reviewed by the inspectors, the allegation was not substantiated. Specifically, the CR was dispositioned, reviewed and closed per the condition report program procedures. No violation of NRC requirements or license commitments was identified.

While the licensee's actions were consistent with their corrective action process, the inspectors did identify that enhancements to certain fire protection procedures warranted further evaluation. This is discussed in the writeup for Concern 1 on the previous page.

ALLEGATION EVALUATION REPORT

ALLEGATION RII-2004A-0013

Turkey Point Nuclear Plant

Concern (1)

This concern refers to your conversation with Mr. Necota Staples of the NRC on January 28, 2004, at TP. During this conversation you expressed concern regarding procedural enhancements which you felt were necessary for time critical manual actions used in a safe shutdown in the event of a fire. Your concern centered on the [REDACTED] accomplishing designated manual actions. 7C

Discussion:

During our initial conversation and follow-up discussion on February 11, 2004 you did not identify any specific manual actions or fire zones containing manual actions of concern. Similarly, Condition Report CR [REDACTED] did not provide this information either. Therefore, the inspectors limited their sample of manual actions independently inspected to those in Fire Zones 067, 063, 106, and 106R. These were the fire zones reviewed in conjunction with our triennial fire protection inspection.

To address your concern, the inspectors reviewed TPNP Fire Protection Functional Inspection, Framatome-ANP-Manual-Action-Timelines-and-Feasibility-Evaluation-Rev-0, and PTN-ENG-SEMS-03-045, Appendix R Safe Shutdown Timelines for Manual Actions. Further, the manual actions reviewed by the inspectors were evaluated for feasibility using the criteria contained in our Inspection Procedure Number 71111.05T, Fire Protection.

For the fire zones selected, the inspectors determined that an operator could accomplish the manual actions reviewed as currently written, that is, without the individual operator being assigned specific manual actions. However, there were several manual actions identified by the inspectors that could be enhanced if assigned to a specific operator as opposed to being delegated to the first available operator. This was identified to the licensee during the course of the inspection. The licensee initiated CR 04-0705 to review their fire protection procedures for possible enhancement in this regard.

Conclusion:

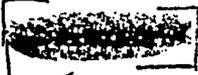
Based on a sample of manual actions reviewed by the inspectors, the allegation was not substantiated, in that the procedures can be performed as written [REDACTED]. No violation of NRC requirements or license commitments was identified. The inspectors did identify that some time critical manual actions could be enhanced [REDACTED] 7C



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SUBJECT: ALLEGATION NO. RII-2004-A-0013

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This is in reference to our letter of February 27, 2004, which indicated that we would initiate action to review your concerns related to time critical manual actions in the fire protection procedures at the Turkey Point Nuclear Plant and the licensee's failure to follow the problem identification program process. We have completed our inspection in response to the concerns you brought to our attention on January 28, 2004. The enclosed Allegation Evaluation Report lists your concerns and describes how the NRC resolved them.

The inspectors determined that these issues do not represent noncompliances nor present immediate safety concerns. ~~One of the identified concerns was re-entered into the licensee's~~ corrective action program to afford further licensee review. These issues will not be documented in an inspection report, and no regulatory action is planned.

Thank you for informing us of your concerns. We feel that our actions in this matter have been responsive to those concerns. We take our safety responsibilities to the public very seriously and will continue to do so within the bounds of our lawful authority. Should you have any additional questions, or if I can be of further assistance in this matter, you may contact me at 800-577-8510 or 404-562-4605 or by mail at P. O. Box 845, Atlanta, Georgia 30301.

Sincerely,

Charles R. Ogle

Enclosure(s): As stated