

#### UNITED STATES NUCLEAR REGULATORY COMMISSION

**REGION II** 

245 PEACHTREE CENTER AVENUE NE, SUITE 1200 ATLANTA, GEORGIA 30303-1257

November 17, 2010

EA-09-321

Mr. Mano Nazar Executive Vice President Nuclear and Chief Nuclear Officer Florida Power and Light Company P.O. Box 14000 Juno Beach, Florida 33408-0420

SUBJECT: PUBLIC REGULATORY PERFORMANCE MEETING SUMMARY – ST. LUCIE

NUCLEAR PLANT, UNIT 1 - DOCKET NO. 50-335

Dear Mr. Nazar:

This refers to the meeting conducted on November 4, 2010, in Jensen Beach, Florida. The purpose of this Regulatory Performance Meeting was to discuss corrective actions associated with the Yellow finding that was documented in NRC Inspection Report 05000335/2010007. The finding dealt with the failure to identify and correct the source of air in-leakage into the component cooling water (CCW) system. Your staff's presentation adequately described their evaluation of the root causes of the issue and corrective actions proposed to prevent recurrence. The NRC reviewed those corrective actions and documented closure of the finding in NRC Inspection Report 05000335/2010009. The meeting was beneficial in that it furthered both NRC and public understanding of your St. Lucie facility. Details of the meeting are provided in the Enclosures to this letter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and Enclosures will be made 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 <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Sincerely,

/RA/

Daniel W. Rich, Chief Rector Projects Branch 3 Division of Reactor Projects

Docket No.: 50-335 License No.: DPR-67

Enclosures: 1. List of Attendees

2. NRC Presentation

3. Licensee Presentation

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X PUBLICLY AVAILABLE 

NON-PUBLICLY AVAILABLE 

SENSITIVE 

X NON-SENSITIVE

ADAMS: X Yes ACCESSION NUMBER:\_\_\_\_\_ XSUNSI REVIEW COMPLETE

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E-MAIL COPY?	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO

FP&L 2

cc w/encl:

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FP&L 3

Letter to Mano Nazar from Daniel W. Rich dated November 17, 2010

SUBJECT: PUBLIC REGULATORY PERFORMANCE MEETING SUMMARY – ST. LUCIE

NUCLEAR PLANT, UNIT 1 - DOCKET NO. 50-335

#### Distribution w/encl:

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OE Mail
RIDSNRRDIRS
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#### **Attendance List**

**November 4, 2010** 

#### **Regulatory Performance Meeting**

NAME	AFFILIATION	CONTACT INFO.
ATT KLEINBATH	NE, CHBIE	3
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# St. Lucie Nuclear Plant Regulatory Performance Meeting



Nuclear Regulatory Commission - Region II

Jensen Beach, FL

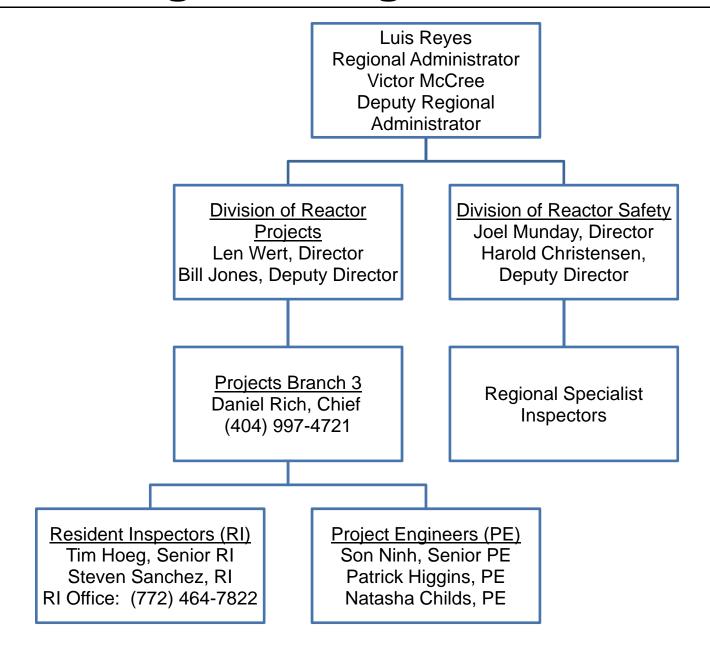
November 4, 2010

# Agenda

- Introduction
- Review of Reactor Oversight Process
- Discussion of current plant performance
- Performance deficiency
- Licensee discussion of corrective actions
- Supplemental Inspection results
- NRC Closing Remarks

- NRC available after presentation to address public questions
- NRC Public Meeting Feedback Forms
- Please sign attendance list

# **Region II Organization**



# **Our Mission**

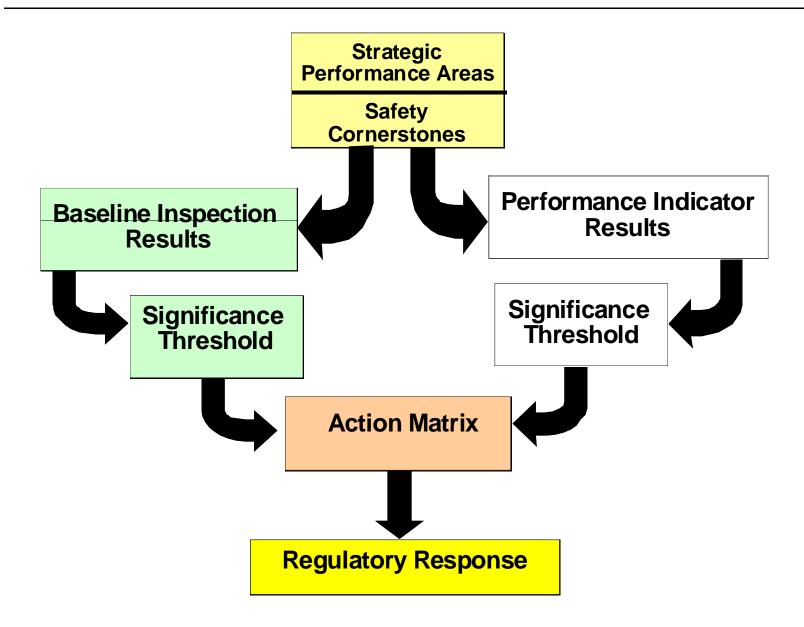


 To license and regulate the nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of public health and safety, promote the common defense and security, and protect the environment.

# The NRC Regulates

- Nuclear reactors commercial power reactors, research and test reactors, new reactor designs
- Nuclear materials nuclear reactor fuel, radioactive materials for medical, industrial, and academic use
- <u>Nuclear waste</u> transportation, storage and disposal of nuclear material and waste, decommissioning of nuclear facilities
- Nuclear security physical security of nuclear facilities and materials from sabotage or attacks

# **Reactor Oversight Process**



# Significance Threshold

### Inspection Findings & Performance Indicators

**Green**: Very Low Safety Significance

White: Low to Moderate Safety Significance

Yellow: Substantial Safety Significance

Red: High Safety Significance

#### NRC Response:

**Green:** Only Baseline Inspection

White: Requires additional NRC oversight

Yellow: Requires additional NRC oversight

Red: Requires additional NRC oversight

# **Action Matrix Concept**

Licensee Regulatory Response Cornerstone Multiple/Rep Degraded Cornerstone Cornerstone Unacceptable Performance



**Increasing Safety Significance** 

**Increasing NRC Inspection Efforts** 

Increasing NRC/Licensee Management Involvement

**Increasing Regulatory Actions** 

# St Lucie Unit 1 Performance

Unit 1 Entered the Degraded Cornerstone Column of the Action Matrix in the 4<sup>th</sup> Quarter, 2009, Due to identification of a Yellow Finding

# **Unit 1 Action Matrix**

1 <sup>st</sup> Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009	1st Qtr 2010	2nd Qtr 2010	3rd Qtr 2010	4th Qtr 2010
Licensee Response (Column 1)	Licensee Response (Column 1)	Licensee Response (Column 1)	Yellow finding for air-in leakage into CCW	Yellow finding for air-in leakage into CCW	Yellow finding for air-in leakage into CCW	Yellow finding for air-in leakage into CCW	Licensee Response (Column 1)
Licensee Response (Column 1)	Licensee Response (Column 1)	Licensee Response (Column 1)	Degraded Cornerstone (Column 3)	Degraded Cornerstone (Column 3)	Degraded Cornerstone (Column 3)	Degraded Cornerstone (Column 3)	Licensee Response (Column 1)

NRC Action Matrix					
Key	Licensee Response	Regulatory Response (Column	Degraded Cornerstone	Multiple /Repetitive	_
	(Column 1)	2)	(Column 3)	Degraded (Column 4)	Performance (Column 5)

# **Unit 2 Action Matrix**

Unit 2 for the 3<sup>rd</sup> qtr 2010 was within the Licensee Response Column

- All inspection findings being Green
- All PI's being Green requiring no additional NRC oversight

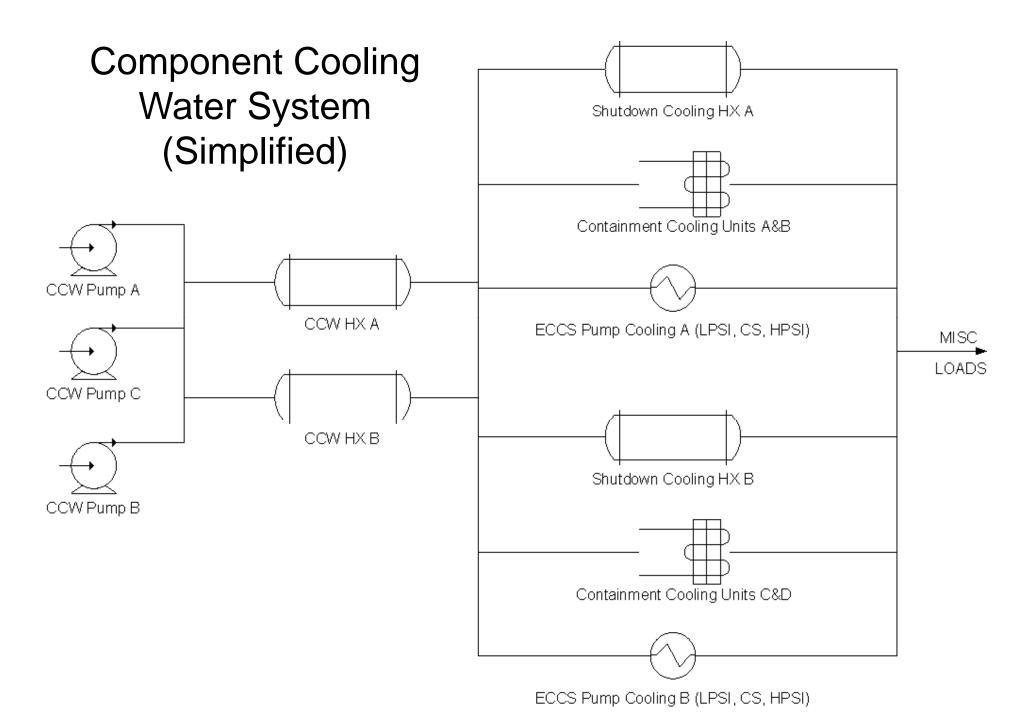
# **Unit 2 Action Matrix**

1 <sup>st</sup> Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009	1st Qtr 2010	2nd Qtr 2010	3rd Qtr 2010	4th Qtr 2010
Licensee Response (Column 1)							
Licensee Response (Column 1)							

NRC Action Matrix
Key
Licensee Response
(Column 1)
Regulatory Response
(Column 2)
Degraded Cornerstone
(Column 3)
Multiple /Repetitive
Degraded (Column 4)
Unacceptable
Performance (Column 5)

# Performance Deficiency

- Air in-leakage into the Unit 1 CCW system occurred in October 2008. The licensee did not identify the root cause.
- NRC Inspection found the failure to identify and correct the root cause was a performance deficiency.
- The risk significance was evaluated by the Significance Determination Process, and a Yellow finding was issued.



# Licensee discussion of corrective actions

# IP 95002 Supplemental Inspection Objectives

- Ensure Root and Contributing Causes are understood
- Independently Assess Extent of Condition and the Extent of Cause
- Evaluate Safety Culture
- Corrective Actions

# Supplemental Inspection Results

- The licensee's Root Cause Evaluation (RCE) was Broad in Scope; Appropriate Level of Detail
- The root and contributing causes of the event were well understood
- Corrective Actions Appropriate and Sufficient to address the Root and Contributing Causes

# Supplemental Inspection Results

 The licensee's extent of condition and the extent of cause were sufficient in breadth and scope

Appropriately Considered Safety Culture

# Supplemental Inspection Results

- Corrective Actions were Comprehensive:
  - Operability Determination Process
  - Corrective Action Program
  - Plant Procedures
  - Equipment Design Changes

# **Assessment**

 St. Lucie Unit 1 Performance transitioned from Degraded Cornerstone to Licensee Response; Oct 1, 2010

 St. Lucie Unit 2 Performance remained in the Licensee Response Column for CY 2010

# Contacting the NRC

- Report an emergency
  - (301) 816-5100 (call collect)
- Report a safety concern:
  - **(800) 695-7403**
  - Allegation@nrc.gov
- General information or questions
  - www.nrc.gov
  - Select "About NRC" for Public Affairs

# Reference Sources

- Reactor Oversight Process
  - http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html
- Public Electronic Reading Room
  - http://www.nrc.gov/reading-rm.html
- Public Document Room
  - 1-800-397-4209 (Toll Free)



# St. Lucie Unit 1 Component Cooling Water Event

November 4, 2010

Rich Anderson Site Vice President

## **Nuclear Safety is our Overriding Priority**

- Corrective Action Program as "Core Business"
  - CAP Excellence Attributes
- Nuclear Excellence Model
  - Value Based
  - Nuclear Safety Culture
  - Self-Improving Culture and Learning Organization
  - Safety Guiding Principles



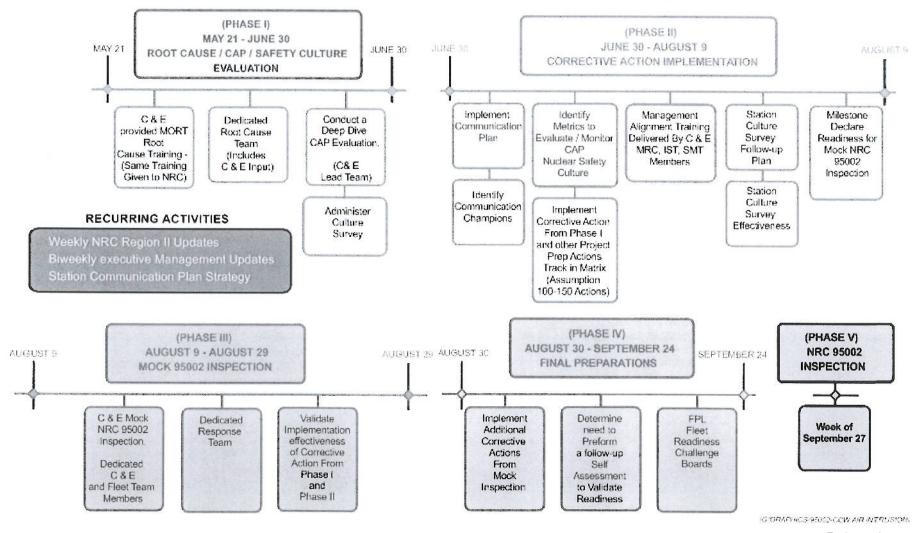
## **Unit 1 Component Cooling Water Event**

- Original Plant Design
- Identification of event significance and effective correction action
- Multi-phased approach for event evaluation



# St. Lucie

#### PSL NRC 95002 DEGRADED CORNERSTONE INSPECTION TIMELINE



# **Improvement Strategy**

Performance Improvement

Nuclear Safety Culture Program

Communication Outreach Plan



- Component Cooling Water Design and Knowledge
- Process Changes
- Sustainability



#### CCW Design and Knowledge Initiatives

- Design modification completed to eliminate Unit 1 CCW air intrusion pathway
- Implemented Operations response procedures
- Trained on Unit 1 CCW air intrusion events and response
- Completed evaluations of extent of condition and extent of cause

#### Results

Increased overall site awareness of CCW air intrusion risks



#### Process Initiatives

- Improved assessment of Operating Experience
- Improved Corrective Action Program procedures
- Improved Operations procedures, including Operational Decision-Making
- Improved Maintenance procedures, including maintenance configuration control
- Ongoing Effectiveness Reviews

#### Results

- Improved risk informed decision-making
- Increased focus on nuclear safety implications
- Increased focus on system interactions
- Increased accountability for corrective action program performance



#### Sustainability Initiatives

- Continued reinforcement of Nuclear Excellence Model
- Implemented Nuclear Safety Culture Oversight Committee
- Conducted root cause, apparent cause, and failure modes and effects analysis training
- Improved Initial Screening Team (IST), Management Review Committee (MRC) and Corrective Action Review Board (CARB) performance
- Implemented operational decision-making and condition report screening performance indicator metrics
- Scheduled effectiveness assessments



## **Nuclear Safety Culture**

#### **Initiatives**

- Nuclear Safety Culture oversight program
- Increased monitoring of safety culture at plant and fleet levels
- Revised fleet procedures to add safety culture aspects including establishment of safety culture advocate
- Fleet safety culture initiative, including safety culture surveys
- Improved safety culture and safety conscious work environment awareness

#### Results

- Increased management sensitivities to safety culture issues
- Increased communications with workforce
- Improved management focus and behaviors regarding safety culture



#### **Communication Outreach Plan**

- Organizational Alignment
- Station All-Hands Meetings
- Leadership Meetings
- Department Road Shows
- 2 C's Meetings with PGM and SVP



#### What We Learned From This Event

- Event significance
- · CAP
- Nuclear Safety Culture
- Performance Improvement and Sustainability

