April 4, 2011

Mr. Mano K. Nazar
Senior Vice President and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop NNP/JB
700 Universe Boulevard
Juno Beach, FL 33408-0420

SUBJECT: NRC INSPECTION REPORT NOS. 05200040/2011-201 AND 05200041/2011-201 AND NOTICE OF VIOLATION

Dear Mr. Nazar:

On February 28, 2011 through March 4, 2011, the U.S Nuclear Regulatory Commission (NRC) conducted an inspection at the headquarters of Florida Power & Light Company (FPL) in Juno Beach, FL. The purpose of the NRC inspection was to verify that FPL effectively implemented quality assurance (QA) processes and procedures for activities related to the Turkey Point Units 6 and 7 combined license application. The inspection focused on assessing compliance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," and selected portions of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." The enclosed report presents the results of this inspection.

Based on the results of this inspection, the NRC determined that two Severity Level IV violations of NRC requirements occurred. The NRC evaluated the violations in accordance with the agency's Enforcement Policy, which is available on the NRC's Web site at http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html.

These violations are cited in the enclosed Notice of Violation (Notice) and circumstances surrounding it are described in detail in the subject inspection report. The violations are being cited in the Notice because the NRC inspection team identified examples in which FPL failed to adequately implement aspects of its Part 21 program and its corrective action program in accordance with Appendix B to 10 CFR Part 50.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from

the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or Safeguards Information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material be withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide, in detail, the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21, "Protection of Safeguards Information: Performance Requirements."

Sincerely,
/RA/

Juan Peralta, Chief
Quality and Vendor Branch 1
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket Nos.: 05200040 and 05200041

Enclosures:
1. Notice of Violation
2. Inspection Report Nos. 05200040/2011-201 and 05200041/2011-201 and Attachment

made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or Safeguards Information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material be withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide, in detail, the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21, "Protection of Safeguards Information: Performance Requirements."

Sincerely,
/RA/

Juan Peralta, Chief
Quality and Vendor Branch 1
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket Nos.: 05200040 and 05200041

Enclosures:
1. Notice of Violation
2. Inspection Report Nos. 05200040/2011-201 and 05200041/2011-201 and Attachments

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NOTICE OF VIOLATION

Florida Power & Light Company
Turkey Point Units 6 and 7
Juno Beach, FL

Docket Nos.: 05200040 and 05200041
Report No. 2011-201

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the headquarters offices of Florida Power Light & Company (FPL) in Juno Beach, FL, on February 28 through March 4, 2011, the NRC inspection team identified violations of NRC requirements. In accordance with the NRC Enforcement Policy, the violations are described below:

A. Title 10 of the *Code of Federal Regulations* (10 CFR) 21.21(a), requires, in part, that each individual, corporation, partnership, or other entity subject to 10 CFR Part 21, "Reporting of Defects and Noncompliance," adopt appropriate procedures to evaluate deviations and failures to comply associated with substantial safety hazards (SSH) as soon as practicable.

   In addition, 10 CFR 21.21(d)(3)(i), requires, in part, that an initial notification by facsimile or telephone be made to the NRC Operations Center within 2 days following receipt of information by the director or responsible corporate officer regarding identification of a defect or a failure to comply.

   Furthermore, 21.21(d)(3)(ii), requires, in part, that a written notification be provided to the NRC within 30 days following receipt of information by the director or responsible corporate officer regarding identification of a defect or a failure to comply.

   Contrary to the above, as of March 4, 2011, FPL has not adopted appropriate procedures to evaluate deviations and failures to comply associated with SSH, and to notify the NRC following receipt of information by the director or responsible corporate officer regarding identification of a defect or a failure to comply. Specifically, FPL procedures ENG-QI-2.2, "10 CFR 21 SSH Evaluation/Reporting," Revision 6, dated July 10, 2010, and IP-801, "Evaluating and Reporting Defects and Failures to Comply for Substantial Safety Hazards in Accordance with 10 CFR Part 21," Revision 15, dated September 8, 2008, do not contain the requisite guidance for the effective evaluation of deviations and failures to comply associated with SSH nor to notify the NRC within the timeframes established by 10 CFR Part 21.21(d)(3). In addition, ENG-QI-2.2 and IP-801 included definitions that differed from those provided in 10 CFR 21.3, "Definitions," thus altering the intended meaning of the terms.

This issue has been identified as Violations 05200040/2011-201-01 and 05200041/2011-201-01.

This is a Severity Level IV violation (Section 6.5.d of the NRC Enforcement Policy).

B. Criterion XVI, "Corrective Action," of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, that measures shall be established to ensure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Section A.6 of FPL-1, "Quality Assurance Topical Report," Revision 8, dated October 22, 2010, states, in part, that a corrective action program is implemented to promptly identify, control, document, classify, and correct conditions adverse to quality.

Contrary to the above, as of March 4, 2011, FPL failed to establish measures to ensure conditions adverse to quality, such as deviations, and nonconformances are promptly identified and corrected. Specifically, FPL failed to promptly correct nonconformances identified in Action Request (AR) 00477542, "Control of RAI, RFI, and NRC Correspondence QA Records," dated May 11, 2010. In addition, FPL failed to correctly identify and document the existence of deviations in AR 01622965, "New Plant OE - Part 21 Reporting Procedure," dated February 23, 2011.

This issue has been identified as Violations 05200040/2011-201-02 and 05200041/2011-201-02.

This is a Severity Level IV violation (Section 6.5.d of the NRC Enforcement Policy).

In accordance with the provisions of 10 CFR 2.201, "Notice of Violation," FPL is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Chief, Quality and Vendor Branch 1, Division of Construction Inspection and Operational Programs, Office of New Reactors, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC Agencywide Documents Access and Management System, accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html, to the extent possible, it should not include any personal privacy, proprietary, or Safeguards Information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21, "Protection of Safeguards Information: Performance Requirements."

In accordance with 10 CFR 19.11, “Postings of Notices to Workers,” you may be required to post this notice within 2 working days of receipt.

Dated at Rockville, MD, this 4th day of April 2011.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NEW REACTORS
DIVISION OF CONSTRUCTION INSPECTION AND
OPERATIONAL PROGRAMS

Docket Nos.:	05200040 and 05200041	
Report Nos.:	05200040/2011-201 and 05200041/2011-201	
Applicant:	Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420	
Applicant Contact:	Mr. Steve Franzone New Nuclear Project Licensing Manager	
Background:	Florida Power & Light Company is pursuing a combined license for two new AP1000 units at the Turkey Point site in Miami-Dade County, FL.	
Inspection Dates:	February 28 – March 4, 2011	
Inspectors:	Yamir Diaz-Castillo Kerri Kavanagh Stacy Smith Marlayna Vaaler Brent Clarke	NRO/DCIP/CQVA Team Leader NRO/DCIP/CQVA NRO/DCIP/CQVB NRO/DCIP/CQVA NRO/DCIP/CQVA
Project Manager:	Manny Comar	NRO/DNRL/NWE1
Approved by:	Juan D. Peralta, Chief Quality and Vendor Branch 1 Division of Construction Inspection and Operational Programs Office of New Reactors	

Enclosure 2

EXECUTIVE SUMMARY

Florida Power & Light Company
Report Nos. 05200040/2011-201 and 05200041/2011-201

The U.S. Nuclear Regulatory Commission (NRC) inspection focused on quality assurance (QA) policies and procedures implemented to support the combined license application (COLA) for Turkey Point (TP) Units 6 and 7, as described in NRC Inspection Manual Chapter 2502, "Construction Inspection Program: Pre-Combined License (Pre-COL) Phase," dated October 3, 2007. The purpose of this inspection was to verify that Florida Power & Light Company (FPL) had implemented an adequate quality assurance (QA) program that complies with the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities." The inspection also verified that FPL had implemented a program under 10 CFR Part 21, "Reporting of Defects and Noncompliance," that meets NRC regulatory requirements.

The NRC based its inspection on the following:

- 10 CFR Part 21
- Appendix B to 10 CFR Part 50

During this inspection, the NRC inspection team implemented Inspection Procedure (IP) 35017, "Quality Assurance Implementation Inspection," dated July 29, 2008, and IP 36100, "Inspection of 10 CFR Parts 21 and 50.55(e) Programs for Reporting Defects and Noncompliance," dated October 3, 2007.

The NRC had not performed any QA inspections at FPL for the TP Units 6 and 7 COLA before this inspection.

10 CFR Part 21 Program

The NRC inspection team concluded that FPL is not implementing its Part 21 program consistent with the requirements of 10 CFR Part 21. The NRC inspection team issued Violations 05200040/2011-201-01 and 05200041/2011-201-01 for FPL's failure to adopt appropriate procedures in accordance with 10 CFR 21.21, "Notification of Failure To Comply or Existence of a Defect and its Evaluation." Specifically, the NRC inspection team determined that FPL's procedures ENG-QI-2.2, "10 CFR 21 SSH Evaluation/Reporting," Revision 6, dated July 10, 2010, and IP-801, "Evaluating and Reporting Defects and Failures to Comply for Substantial Safety Hazards in Accordance with 10 CFR Part 21," Revision 15, dated September 8, 2008, were not appropriate procedures to evaluate deviations and failures to comply associated with SSHs and to notify the NRC within the required timeframe of identification of a defect or a failure to comply. In addition, ENG-QI-2.2 and IP-801 included definitions that differed from those provided in 10 CFR 21.3, "Definitions," that altered the intended meaning of the terms.

Design Control

The NRC inspection team concluded that the implementation of the FPL design control process is consistent with the regulatory requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. Based on its review, the NRC inspection team determined that FPL is

effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

Procurement Document Control

The NRC inspection team concluded that the implementation of the FPL procurement document control process is consistent with the regulatory requirements of Criterion IV, "Procurement Document Control," of Appendix B to 10 CFR Part 50. Based on its review, the NRC inspection team determined that FPL is effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

Document Control

The NRC inspection team concluded that the implementation of the FPL document control process is consistent with the regulatory requirements of Criterion VI, "Document Control," of Appendix B to 10 CFR Part 50. Based on its review, the NRC inspection team determined that FPL is effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

Control of Purchased Equipment, Materials, and Services

The NRC inspection team concluded that the implementation of FPL's control of purchased equipment, materials and services process is consistent with the regulatory requirements of Criterion VII, "Control of Purchased Material, Equipment, and Services" of Appendix B to 10 CFR Part 50. Based on its review, the NRC inspection team determined that FPL is effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

Corrective Actions

The NRC inspection team concluded that FPL is not implementing its Corrective Action Program consistent with the requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. The NRC inspection team issued Violations 05200040/2011-201-02 and 05200041/2011-201-02 for FPL's failure to establish measures to ensure conditions adverse to quality, such as deviations and nonconformances are promptly identified and corrected. Specifically, FPL failed to promptly correct nonconformances identified in closed Action Request 00477542, "Control of RAI, RFI, and NRC Correspondence QA Records," dated May 11, 2010. In addition, FPL failed to correctly identify and document the existence of deviations in AR 01622965, "New Plant OE - Part 21 Reporting Procedure," dated February 23, 2011.

Internal Audits

The NRC inspection team concluded that the implementation of FPL's internal audit process is consistent with the regulatory requirements of Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50. Based on its review, the NRC inspection team determined that FPL is effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

Quality Assurance Records

With the exception of Violations 05200040/2011-201-02 and 05200041/2011-201-02 in relation to FPL's failure to correct conditions adverse to quality associated with storage of QA records in an adequate and timely manner, the NRC inspection team concluded that the implementation of FPL's QA records program is consistent with the regulatory requirements of Criterion XVII, "Quality Assurance Records," of Appendix B to 10 CFR Part 50.

REPORT DETAILS

1. 10 CFR Part 21 Program

a. Inspection Scope

The U.S. Nuclear Regulatory Commission (NRC) inspection team reviewed the implementation of the Florida Power & Light Company's (FPL's) program under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," in support of the combined license application (COLA) for Turkey Point (TP), Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of the FPL Part 21 program to verify compliance with the regulatory requirements of 10 CFR Part 21. The NRC inspection team also discussed this process with members of FPL management and technical staff.

The NRC inspection team reviewed the following documents for this inspection area:

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010
- QI 16 QAD 6, "10 CFR Part 21 Tracking (Information Use)," Revision 17, dated June 12, 2009
- PI-AA-204: "Condition Identification and Screening Process," Revision 10, dated August 30, 2010.
- ENG-QI 2.2, "10 CFR 21 SSH Evaluation/Reporting," Revision 6, dated July 10, 2010
- Form 145, "Substantial Safety Hazard Determination Checklist," Revision 1, dated September 2009
- NP 808, "Evaluating and Reporting Defects and Failures to Comply for Substantial Safety Hazards in Accordance with 10 CFR Part 21," Revision 7, dated October 26, 2009
- EN-AA-203-1100, "Engineering Evaluations," Revision 1, dated February 24, 2011
- JDM-WP-009, "NRC Posting Requirements," Revision 1, dated December 9, 2009
- IP 801, "Evaluating and Reporting Defects and Failures to Comply for Substantial Safety Hazards in Accordance with 10 CFR Part 21," Revision 15, dated September 8, 2008
- ENG-QI 6.6, "Glossary," Revision 11, dated July 10, 2010
- Action Request Number 01623985, "Periodic Review of IP 801 Evaluating and Reporting Defects," dated February 25, 2010
- Action Request Number 01624655, "Procedure QI-2-NNP-01 Requires Additional Detail," dated February 28, 2011

- Action Request Number 01624489, “Review of 10 CFR Part 21 Evaluations Are Sometimes Greater Than 60 Days,” dated February 28, 2011

- Action Request Number 01625239, “NRC IP 36100 Part 21 Inspection Improvement Opportunities,” dated March 2, 2011

- Action Request Number 01622965, “New Plant OE – Part 21 Reporting Procedure,” dated February 23, 2011

- Action Request Number 001625890, “Misuse of Part 21 Terminology,” dated March 3, 2011

- Action Request Number 001625226, “Part 21 Process Ties Include Various Procedures and Departments,” dated March 2, 2011

b. Observations and Findings

b.1 Postings

The NRC inspection team verified that FPL had posted notices that included: (1) a copy of Section 206 of the Energy Reorganization Act of 1974; (2) a description of 10 CFR Part 21 and the FPL procedure that implements the regulation; and (3) the name of the individual to whom reports could be made.

b.2 Purchase Orders

The NRC inspection team reviewed a sample of FPL’s purchase orders (POs) to verify that FPL had implemented a program consistent with the requirements described in 10 CFR 21.31, “Procurement Documents,” regarding specifying the applicability of 10 CFR Part 21 in its POs for safety-related services. The NRC inspection team verified that FPL imposed the requirements of 10 CFR Part 21 on qualified suppliers having programs meeting the requirements of Appendix B to 10 CFR Part 50.

b.3 10 CFR Part 21 Procedures and Implementation

Inspection Procedure (IP) 801 specifies the measures and responsibilities in place to ensure compliance with 10 CFR Part 21. This procedure provides a system for receipt and identification, notification of appropriate organizations, and evaluation of information concerning failures to comply and defects in facilities, activities, or basic components which could create a substantial safety hazard (SSH).

Step 5.2 of IP-801 discusses defect evaluations and states, in part, that an engineering evaluation *may* be accomplished via site specific quality instructions. Although there are multiple procedures that discuss engineering evaluations, there is no procedural connection between IP-801 and the site specific quality instructions that provides guidance on how to perform an engineering evaluation. FPL personnel responsible for the Part 21 program informed the NRC inspection team that ENG-QI 2.2 was used by engineering to perform SSH evaluations. IP-801 and ENG-QI 2.2 both have criteria to determine if a defect exists, but are inconsistent in the way they screen potential deviations. The NRC inspection team concluded that the FPL procedures were not appropriate for evaluating deviations and failures to comply.

The NRC inspection team identified this issue as an example of Violations 05200040/2011-201-01 and 05200041/2011-201-01.

In addition, the NRC inspection team noted that the definitions for deviation, defect, and discovery contained in IP-801 and ENG-QI-2.2 were inconsistent with the definitions contained in 10 CFR 21.3, "Definitions." Specifically, the definitions for defect and deviation failed to include that a deviation could be a departure from technical requirements in early site permit information, a standard design certification or a standard design approval. The use of these terms within the body of IP-801 and ENG-QI-2.2 could cause a departure from technical requirements to not be identified as a deviation. The NRC inspection team identified this issue as another example of Violations 05200040/2011-201-01 and 05200041/2011-201-01.

Furthermore, the NRC inspection team determined that procedures IP-801 and ENG-QI 2.2 lacked guidance for the evaluation of deviations or failures to comply consistent with the timeliness requirements of 10 CFR 21.21(d). Specifically, ENG-QI 2.2 does not provide guidance to notify the NRC Operations Center by telephone or fax within two days of notifying the director or responsible officer nor to provide written notification within 30 days following the identification of a defect or failure to comply, as required in paragraph 21.21(d). The NRC inspection team identified this issue as another example of Violations 05200040/2011-201-01 and 05200041/2011-201-01.

The NRC inspection team noted that FPL had performed no Part 21 evaluations as a part of the TP Units 6 and 7 COLA. The NRC inspection team reviewed a sample of action request (AR) reports and identified no issues that would have warranted reportability under the FPL Part 21 program.

Conclusions

The NRC inspection team concluded that FPL is not implementing its Part 21 program consistent with the requirements of 10 CFR Part 21. The NRC inspection team issued Violations 05200040/2011-201-01 and 05200041/2011-201-01 for FPL's failure to adopt appropriate procedures in accordance with 10 CFR 21.21, "Notification of Failure To Comply or Existence of a Defect and its Evaluation." Specifically, the NRC inspection team determined that FPL's procedures ENG-QI-2.2, "10 CFR 21 SSH Evaluation/Reporting," Revision 6, dated July 10, 2010, and IP-801, "Evaluating and Reporting Defects and Failures to Comply for Substantial Safety Hazards in Accordance with 10 CFR Part 21," Revision 15, dated September 8, 2008, were not appropriate procedures to evaluate deviations and failures to comply associated with SSHs and to notify the NRC within the required timeframe of identification of a defect or a failure to comply. In addition, ENG-QI-2.2 and IP-801 included definitions that differed from those provided in 10 CFR 21.3, "Definitions," that altered the intended meaning of the terms.

2. Design Control

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL and Bechtel design control process in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of the FPL and Bechtel design control process to verify compliance with the regulatory requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, dated October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010

- NNP-PI-08, "COLA Review and Acceptance Process," Revision 4, dated September 10, 2010

- NNP-PI-04, "COLA Configuration Control and Responses to Requests for Additional Information for Project Applications," Revision 2, dated September 10, 2010

- NNP-PI-011, "Change Control for COL Application Plant Specific Design Information," Revision 2, dated August 30, 2010

- Turkey Point Units 6 and 7 Combined License Application Part 7, "Departures and Exemption Requests," Revision 2, December 21, 2010

- PTN DEP 19.58-1, "Core Damage Frequency DCD Departure," Revision 0, dated June 22, 2009

- PTN DEP 2.0-1, "Operating Basis Wind Speed," Revision 0, dated June 22, 2009

- PTN DEP 2.0-3, "Wet Bulb Safety Air," Revision 0, dated June 22, 2009

- Screen/Evaluation Number 2009-002, dated June 15, 2009

- Screen/Evaluation Number 2009-003, dated June 15, 2009

b. Observations and Findings

b.1 Policies and Procedures

The NextEra Energy (NEE) quality assurance topical report (QATR) states, in part, that provisions to control design inputs, processes, outputs, changes, interfaces, records, and organizational interfaces ensure that design inputs (e.g., design bases and the performance, regulatory, quality, and quality verification requirements) are correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions) such that the final design output can be related to the design input in sufficient detail to permit verification. Design processes provide for design verification (as described in Section B.3 of the QATR) to ensure that items and activities subject to the provisions of the QATR are suitable for their intended application, consistent with their effect on safety.

Section 6.3 of QI-2-NNP-01 states, in part, that the New Nuclear Project (NNP) commits to the applicable requirements established in NEE QATR, Sections B.2, "Design Control," and B.3, "Design Verification." FPL has contracted all safety-related combined license design activities to Bechtel.

NNP-PI-011 states, in part, that its purpose is to provide standardized instructions and personnel training and qualification requirements for performing reviews of proposed plant-specific changes to the information contained in a generic design control document (DCD). These reviews are conducted in accordance with Section VIII of Appendix D, "Design Certification Rule for the AP1000 Design," to 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants." (The AP1000 design certification rule establishes the process for evaluating these changes.) The instruction provides guidance to identify those changes that can be performed by FPL without prior NRC review and to distinguish them from changes that require NRC review and approval. FPL has contracted some of the TP Units 6 and 7 plant-specific AP1000 DCD departure analyses to Westinghouse Electric Company (WEC), while performing the remaining analyses in-house.

Bechtel 3DP-G04-00001 defines the requirements for preparation and control of project and task design criteria. Design criteria include client requirements and those standards, codes, regulations, and design bases which shall be used for the project or task design.

Bechtel 3DP-G04G-00037 defines the engineering department requirements for preparing, checking (verifying), approving, revising, filing, retaining, and releasing calculations.

b.2 Design Packages Supporting the Turkey Point Units 6 and 7 Combined License Application

The NRC inspection team reviewed the design control process for Bechtel and the implementation of procedures and policy guidelines governing the process as applied to TP Units 6 and 7. At the time of the inspection, Bechtel had completed 54 safety-related calculations to support the TP COLA. The majority of these calculations supported the geotechnical and hydraulic engineering sections of the TP final safety analysis report (FSAR). The NRC inspection team selected a sample of five design calculation packages and the associated design verification reports that established the design-basis input to several chapters of the TP FSAR. The NRC inspection team noted that three of the calculations reviewed utilized computer software which was validated and verified in accordance with Bechtel procedures.

The NRC inspection team verified that each calculation package contained the design bases, assumptions, and methodology used to develop the calculations, results, and conclusions. The associated design verification reports were performed by individuals who did not perform the analysis and were completed before the calculation being used to support other calculations or TP FSAR sections. The NRC inspection team noted that the samples it reviewed were consistent with the process contained in the Bechtel procedures.

b.3 Turkey Point AP1000 Design Control Document Departure Evaluation Packages

Part 7 of the TP Units 6 and 7 COLA identifies six departures that can be implemented without prior NRC approval and three departures that require NRC approval before implementation. WEC prepared the departure evaluation packages for four of the departures that did not require prior NRC approval for implementation and two of the departures that did require NRC approval before implementation.

The NRC inspection team reviewed three departure evaluation packages prepared by WEC and two departure evaluation packages prepared by FPL. WEC departure evaluation packages, PTN DEP 2.0-1 and PTN DEP 2.0-3, as well as FPL departure evaluation package, Screen/Evaluation Number 2009-003, were identified as departures that require NRC approval before implementation. PTN DEP 19.58-1 and Screen/Evaluation Number 2009-002 were

identified as departures that can be implemented without prior NRC approval. The WEC departure evaluation packages contained a purpose, scope, assumptions, design basis, codes and standards, reference standards, design methodology, design calculations, drawings, and computer verification data, as applicable. The FPL departure evaluation packages relate to the locations of the operations support center (OSC) and technical support center (TSC). The change to the location of the OSC does not change the manner in which any SSC design functions are performed or controlled. The change of the location of the TSC is a Tier 2* change which requires submittal to the NRC for review. In all cases, the NRC inspection team concluded that the TP AP1000 DCD departures were evaluated in accordance with the requirements of Section VIII of Appendix D to 10 CFR Part 52.

In addition, the NRC inspection team verified that the FPL evaluators and reviewers assigned to review the WEC departure evaluation packages or to develop the FPL departure evaluation packages met the training and qualifications specified in Section 3.3 of FPL NNP-PI-011.

c. Conclusions

The NRC inspection team concluded that the implementation of the FPL and Bechtel design control process is consistent with the regulatory requirements of Criterion III of Appendix B to 10 CFR Part 50. Based on the sample of documents reviewed, the NRC inspection team also concluded that FPL is effectively implementing its policies and associated procedures in support of the COLA for TP Units 6 and 7. No findings of significance were identified.

3. Procurement Document Control

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL procurement document control process in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of FPL's procurement document control process to verify compliance with Criterion IV, "Procurement Document Control" of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, dated October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010

- BO-AA-102-1008, "Procurement Control," dated March 2, 2010

- QI-4-NSC-1, "Procurement Control," Revision 10, dated January 1, 2011

- QI-4-NSC-9, "Procurement Engineering Control," Revision 2, dated January 6, 2011

- QI-4-NSC-10, "Procurement Engineering Special Quality Assurance Documents (SQADs)," Revision 0A, dated October 28, 2008

In addition, the NRC inspection team the following two purchase orders (POs) to verify proper implementation of FPL's procurement document control program:

- PO 4500395492, "Agreement for Consulting and Design Engineering Services between Florida Power & Light Company and Bechtel Power Corporation for a Development of a Combined License Application," dated November 5, 2007

- PO 4500404639, "Westinghouse Support for Turkey Point Units 6 & 7 COL Application Development," dated May 20, 2008

b. Observations and Findings

b.1 Policies and Procedures

Section B.4, "Procurement Control," of the QATR establishes the measures and governing procedures to ensure that purchased items and services are subject to the appropriate technical, quality, regulatory, and administrative requirements. Applicable technical, regulatory, administrative, quality, and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and the requirements of 10 CFR Part 21) are invoked for procurement of items and services.

Section 6.4 of QI-2-NNP-01 states, in part, that NNP commits to the applicable requirements established in Section B.4 of the QATR and procurement of safety-related goods or services will be developed in accordance with QI-4-NSC-1.

BO-AA-102-1008 provides general guidance regarding the control and required responsibilities for the procurement of services and materials.

QI-4-NCS-1 provides specific guidance for the procurement of materials, equipment, and contracted services; as well as controls for corresponding procurement documents.

QI-4-NSC-9 establishes the engineering review, quality, and technical requirements for items and services and ensures that procurement documents clearly identify applicable requirements.

QI-4-NSC-10 provides the requirements and recommendations for the preparation, revision, and issuance of special quality assurance documents (SQADs). SQADs are standardized procurement requirements that are imposed on all procurement documents, as applicable.

The NRC inspection team determined that the documents that control the procurement process provide sufficient guidance to ensure that the necessary technical, quality, regulatory, and administrative requirements are imposed on FPL vendors.

b.2 Implementation of Procurement Document Process

The NRC inspection team reviewed POs 4500395492 and 4500404639, which are associated with the development of the TP Units 6 and 7 COLA, to determine whether the requirements identified in the procedures were imposed on applicable purchasing documents. The NRC inspection team found that the POs adequately documented the procurement requirements as established by the governing policies and procedure. Documentation included task definitions and responsibilities; imposition of appropriate quality, technical, and regulatory requirements;

and identification of applicable codes and standards. The NRC inspection team also found that the POs adequately defined contract deliverables, disposition of nonconformances, access rights to sub tier suppliers, and extension of contractual requirements to subcontractors.

In addition, the NRC inspection team confirmed that all of the POs reviewed included clauses invoking the provisions of 10 CFR Part 21 and requiring the vendor to conduct the work under its QA plan related to Appendix B to 10 CFR Part 50.

c. Conclusions

The NRC inspection team concluded that the implementation of the FPL procurement control process is consistent with the regulatory requirements of Criterion IV of Appendix B to 10 CFR Part 50. Based on the sample of documents reviewed, the NRC inspection team also concluded that FPL is effectively implementing its policies and associated procedures in support of the COLA for TP Units 6 and 7. No findings of significance were identified.

4. Document Control

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL document control process in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of FPL's document control process to verify compliance with Criterion VI, "Document Control" of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, dated October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010.

- AD-AA-100-1004, "Preparation, Revision, Review and Approval of Procedures", Revision 5, dated January 19, 2011

- RM-AA-101, "Control of Documents", Revision 3, dated February 8, 2011

- AD-AA-01, "Document Usage and Administration", Revision 0, dated January 31, 2008

b. Observations and Findings

b.1 Policies and Procedures

Section B.14, "Document Control," of the QATR establishes the measures and governing procedures to specify the format and control the development, review, approval, issue, use, and revision of documents that specify quality requirements or prescribe activities affecting quality or safe operation to ensure the use of correct documents. These measures ensure that specified documents are reviewed for adequacy, approved before use by authorized persons, distributed

according to current distribution lists, and used at the location where the prescribed activity takes place. Revisions to controlled documents are reviewed for adequacy and approved for release by the same organization or organizations as originally did so or by other designated organizations that are qualified and sufficiently knowledgeable of the requirements and intent of the original document.

Section 6.6 of QI-2-NNP-01 states, in part, that NNP commits to the applicable requirements established in Section B.4 of the QATR and that procedures will be available at the locations where the activities are conducted. In addition, a controlled index or list of effective pages for controlled documents will be prepared and controlled documents will include a unique identifier (e.g., revision number, amendment number, approval date) to assist the user in determining that the correct version is being used.

AD-AA-100-1004 defines the requirements for document preparation, revision, review and approval of FPL procedures.

RM-AA-101 defines the document control process for FPL controlled documents.

AD-AA-01 establishes the policy for standardizing documentation across the FPL nuclear fleet.

b.2 Implementation of Document Control Process

The NRC inspection team reviewed a representative sample of QA documents and conducted interviews with QA personnel to verify that implementation of the document control processes including approval, issuance, and revisions were consistent with the applicable QA guidance. In general, the document control process is conducted electronically where documents are generated, reviewed, signed, date stamped, and distributed electronically. The approved documents are transmitted using a “read only” format. The NRC inspection team also verified that revisions were reviewed and approved appropriately by the originating organizations, and that superseded documents were recorded in the various records of revisions for each document.

Documents are archived in a records management system where they are made available for retrieval. Recent documents are electronically controlled within the FPL Nuclear Asset Management System (NAMS) database. The NRC inspection team discussed the NAMS database with FPL staff responsible for managing the database. The FPL staff explained the process for document entry and retrieval. The NRC inspection team verified that the FPL staff is adequately managing the NAMS database in accordance with the document control procedures.

c. Conclusions

The NRC inspection team concluded that the implementation of the FPL document control process is consistent with the regulatory requirements of Criterion VI of Appendix B to 10 CFR Part 50. Based on the sample of documents reviewed, the NRC inspection team also concluded that FPL is effectively implementing its policies and associated procedures in support of the COLA for TP Units 6 and 7. No findings of significance were identified.

5. Control of Purchased Equipment, Materials, and Services

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL control of purchased equipment, material and services process in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of FPL and Bechtel control of purchased equipment, material and services process to verify compliance with the regulatory requirements of Criterion VII, "Control of Purchased Equipment, Material, and Services" of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010.

- QI 7 QAD 4, "Supplier Review," Revision 35, dated July 30, 2009

- QI 7 QAD 5, "Establishing and Maintaining the Qualified Suppliers List," Revision 29, dated July 30, 2009

- QI 7 QAD 6, "Methods for Supplier Evaluation," Revision 35, dated July 30, 2009

- QI 10 QAD 1, "Surveillances," Revision 4, dated December 1, 2008

- QI 16 QAD 3, "Controlling Supplier Open Items," Revision 33, dated February 12, 2010

- QI 18 QAD 11, "Evaluation of Supplier Audit Reports Received From External Organizations," Revision 20, dated July 30, 2009

- NNP-PI-04, "COLA Configuration Control and Responses to Requests for Additional Information for Project Applications," Revision 2, dated September 10, 2010
- NNP-PI-08, "COLA Review and Acceptance Process," Revision 4, dated September 10, 2010

- NA-AA-203-1000, "Performance of Nuclear Oversight Audits," Revision 2, dated November 8, 2010

- 2011 Supplier Evaluation Annual Plan, dated February 24, 2011

- Bechtel Nuclear Quality Assurance Manual, Revision 4, dated November 11, 2002

- Florida Power & Light Company, Turkey Point Combined Operating License Project, Bechtel Job No. 25409, Quality Assurance Program Plan, Revision 1, dated June 8, 2009

In addition, the NRC inspection team reviewed the following audits performed during the preparation of the TP Units 6 and 7 COLA:

- Southern California Edison Audit No. BPC-1-08, NUPIC Joint Utility Audit No. 20084 of Bechtel Power Corporation; and Corrective Action Request No. S-1993, dated April 4, 2008 (audit performed March 3-7, 2008)

- South Texas Project Nuclear Operating Company Quality Audit of Bechtel Power Corporation - Audit No. 10-067 (VA), dated November 17, 2010 (audit performed October 25-28, 2010)

- FPL Audit PQA 10-173 using an Audit/Survey Report Review Checklist, dated January 20, 2011

- NUPIC Limited Scope Audit of Nuclear Power Plants U.S. AP1000 Project Activities, PGN Audit QAA/0300-10-01, NUPIC Audit No.: 22766, dated October 27, 2010 (audit performed September 27 - October 1, 2010)

- FPL/FPLE QA Surveillance Report – Report No. 08.06.BEPMD.08.3, dated July 15-16, 2008

- FPL/FPLE QA Surveillance Report – Report No. 08.06.BEPMD.08.4, dated September 29, 2008
- Bechtel Quality Surveillance Report, Surveillance No. 25409-QSSS-08-001, dated February 20, 2008 (audit performed February 12, 2008)

- Bechtel Quality Surveillance Report, Surveillance No. 25409-QSSS-08-002, dated March 4, 2008 (audit performed February 25-27, 2008)

- Bechtel Quality Surveillance Report, Surveillance No. 25409-QSSS-08-003, dated April 9, 2008 (audit performed March 18, 2008)

- FPL Turkey Point COL Project QA Surveillance No. 25409-QSSS-08-001 Follow-up, dated April 3, 2008 (File No. 25409-000-IOM-GAP-00003)

- Bechtel Quality Surveillance Report, Surveillance No. 25409-QSVS-08-002, dated May 7, 2008 (audit performed April 14-15, 2008)

- FPL Turkey Point COL Project QA Surveillance No. 25409-QSVS-08-002 Follow-up, dated July 25, 2008 (File No. 25409-000-IOM-GAP-00011)

- Supplier Audit Report MACTEC Engineering & Consulting, Raleigh, NC – Report No. ESL-2008-007, Revision 1, dated January 2, 2009 (audit performed October 21 - 24, 2008)

- Supplier Audit Report MACTEC Engineering & Consulting, Raleigh, NC – Report No. 2009-ESL-005, dated June 19, 2009 (audit performed May 19 - 20, 2009)

- Bechtel Quality Surveillance Report, Surveillance No. 25409-QSVS-08-001, dated April 10, 2008 (audit performed March 14, 2008)

b. Observations and Findings

b.1 Policies and Procedures for Vendor Qualification

Sections B.4 and B.5, "Procurement Verification," of the QATR establishes the requirements for the evaluation of prospective suppliers of safety-related items and services to ensure that only qualified suppliers are used. Qualified suppliers are periodically evaluated to ensure that they continue to provide acceptable products and services. The results of the reviews are promptly considered for their effect on a supplier's continued qualification, and adjustments are made as necessary (including corrective actions, adjustments of supplier audit plans, and input to third-party auditing entities, as warranted). In addition, results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality requiring additional action. Measures are also established and implemented to verify the quality of purchased items and services, whether purchased directly or through contractors, at intervals and to a depth consistent with the item's or service's importance to safety, complexity, quantity, and the frequency of procurement.

Section 6.7 of QI-2-NNP-01 establishes the measures and governing procedures to control the procurement of items and services associated with the TP Units 6 and 7 COLA to ensure conformance with specified requirements. The NRC inspection team noted that FPL's control of procurement of items and services consisted of the maintenance of a qualified suppliers list (QSL), periodic evaluation of qualified suppliers, activities to verify quality, audits, and examination of items and services.

QI 7 QAD 5 delineates the responsibilities and requirements for establishing and maintaining the FPL QSL. The procedure also applies to the establishment, maintenance, and control of commercial grade suppliers and augmented quality suppliers as applicable based on specific requirements for supplier control.

QI 7 QAD 6 delineates the methods by which the nuclear oversight organization evaluates and approves the suppliers of items or services that are to be procured for nuclear power plants, and is applicable to all items or services that are designated as safety related, commercial grade requiring an approved supplier, or augmented quality.

QI 18 QAD 11 provides instructions for the evaluation of supplier audit and commercial grade survey reports received from the Nuclear Procurement Issues Committee (NUPIC), the American Society of Mechanical Engineers (ASME), individual nuclear utilities, and other FPL/NEE approved organizations.

b.2 Maintenance of the Qualified Suppliers List

Section B.4 of the QATR, Section 6.7 of QI-2-NNP-01, and QI 7 QAD 5 define the controls for the establishment, maintenance, distribution, and update of the QSL. The procedures state that the appropriate group within the nuclear oversight organization has the responsibility for preparing, approving, maintaining current, and distributing the QSL and any revisions to this list. When a QSL change is made requiring the performance of an audit and surveillance during the supplier's onsite activities, the nuclear oversight organization is responsible for notifying the affected parties, as well as ensuring that a condition report (CR) is initiated in the event that a QSL change is prompted by the discovery of supplier deficiencies that might adversely impact items and services on order or previously delivered.

The NRC inspection team verified that the QSL was kept up to date and that any revision to the list was implemented in accordance with the applicable procedures.

b.3 External Audits

NA-AA-203-1000 and QI 7 QAD 6 establishes the requirements and methods for implementation of the program for performing supplier audits and surveillances, including the actions to be taken to address and follow up on any findings identified. FPL conducts audits at a supplier's facility to verify implementation of in-process activities and acceptability of the written QAP and procedures in order to reach conclusions about whether items produced under the supplier's processes will perform their intended functions.

At the time of this inspection, Bechtel was the prime contractor with retained responsibility for development of the TP Units 6 and 7 COLA. Bechtel maintained responsibility for the qualification and oversight of its subcontractors and suppliers (such as MACTEC and ABSG Consulting). FPL plans to complete the TP Units 6 and 7 COLA project using the application developed by Bechtel in conjunction with AP1000 design services from WEC, as necessary.

The NRC inspection team reviewed a sample of external audits and supplier evaluations conducted by both FPL and Bechtel to verify adequate implementation of the respective audit programs. The NRC inspection team verified that audit plans identifying the audit scope, focus, and applicable checklist criteria had been prepared and approved before the initiation of the audit activity. The NRC inspection team also verified that the checklists were prepared and completed for the audit and contained sufficient objective evidence to support the conclusions made by the auditors. In addition, the NRC inspection team verified that external audits were performed by qualified lead auditors and auditors. For audits and surveillances resulting in findings, the NRC inspection team verified that the supplier had established a plan for corrective actions and that FPL and Bechtel had verified its satisfactory completion and proper documentation.

For supplier audits or surveys conducted by organizations external to FPL, such as NUPIC, ASME, individual nuclear utilities, and other FPL/NEE-approved organizations, the NRC inspection team verified that FPL had reviewed, accepted, and appropriately dispositioned any findings evaluations performed by these external organizations, in accordance with QI 18 QAD 11.

b.4 Combined License Application Review and Acceptance Process

NNP-PI-08 and NNP-PI-04 provide: (1) the administrative requirements for the review of the COLA from the initial draft through final FPL acceptance of the initial application; (2) updates to the COLA either annually or more frequently if necessary; and (3) the administrative requirements for maintaining the configuration of the COLA during the post submittal review process.

These procedures establish the review guidelines to be utilized by the licensing review board (LRB) as a part of its evaluation and acceptance of various work products related to the TP Units 6 and 7 COLA. The LRB consists of FPL licensing and engineering personnel, COLA contractor personnel, and others as required to review COLA chapters for completeness and sufficiency for submittal to the NRC.

The NRC inspection team reviewed the documentation associated with the acceptance of various COLA sections, integrated chapters, and revisions via the applicable LRB meeting determinations, and verified that FPL is adequately implementing the COLA review and acceptance process outlined above.

c. Conclusions

The NRC inspection team concluded that the implementation of FPL's control of purchased equipment, materials, and services process is consistent with the regulatory requirements of Criterion VII of Appendix B to 10 CFR Part 50. Based on the sample of documents reviewed, the NRC inspection team determined that FPL is effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

6. Corrective Actions

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL corrective action program (CAP) in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of FPL's CAP to verify compliance with the regulatory requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, dated October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010

- ENG-QI 2.5, "Condition Reports," Revision 24, dated July 10, 2010

- PI-AA-204, "Condition Identification and Screening Process," Revision 10, dated August 30, 2010

- PI-AA-205: "Condition Evaluation and Corrective Action," Revision 10, dated November 8, 2010

- NPP-PI-07, "Department Training," Revision 2, dated August 16, 2010

- WM-AA-201, "Work Order Identification, Screening and Validation Process," Revision 6, dated July 10, 2010

In addition, the NRC inspection team reviewed a sample of AR reports (listed below), attended Initial Screening Team (IST) and Management Review Committee (MRC) meetings, and discussed the program with responsible FPL personnel.

- Action Request Number 01605884, “Nustart Identified Editorial Error RCOLA NRC Submittal, “ dated January 5, 2011

- Action Request Number 01605421, “PTN 6 & 7 Error in Lag Time Value in HEC-HMS Model,” dated January 4, 2011

- Action Request Number 00586866, “Processing of Potential or Reported 10 CFR 21 Issues,” dated October 13, 2010

- Action Request Number 00465189,“The New Nuclear Project (NNP) is Using the Nuclear Division Correction Process,” dated May 17, 2009

- Action Request 00477542, “Control of RAI, RFI, and NRC Correspondence QA Records,” dated May 11, 2010

- Action Request Number 01625226, “Part 21 Process Ties Include Various Procedures & Department”, dated March 2, 2011

- Action Request Number 00586866, “Processing of Potential or Reported 10 CFR 21 Issues,” dated October 13, 2010

- Action Request Number 01625947, “PTN 6 & 7 COLA QA Records Not Transmitted in a Timely Manner,” dated March 3, 2011

- Action Request Number 01620241, “PTN 6 & 7 NNP-PI-03 Procedural Issues for Records Storage,” dated February 15, 2011

- Action Request Number 01612149, “Unites 6/7 QA Records Storage at PTN Administrative Issues,” dated January 25, 2011

- Action Request Number 01622965, “New Plant OE - Part 21 Reporting Procedure,” dated February 23, 2011

- Management Review Committee Agenda for March 3, 2011

- Initial Screening Team Agenda for March 2, 2011

b. Observations and Findings

b.1 Policies and Procedures

Section A.6 of the QATR states, in part, that the CAP is implemented to promptly identify, control, document, classify, and correct conditions adverse to quality. In addition, for significant conditions adverse to quality, the program provides for cause evaluation and corrective actions to prevent recurrence. Provisions are also made to ensure that corrective actions for significant conditions adverse to quality are completed as intended and are not inadvertently nullified by subsequent actions. Results of evaluations of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality and significant adverse trends are documented and reported to responsible management.

Section 6.16 of QI-2-NNP-01 states, in part, that NNP commits to the applicable requirements established in the NEE QATR, Section B.13, "Corrective Action," and that the implementation of the NEE CAP shall be as specified in procedures PI-AA-204 and PI-AA-205. The MRC screens conditions for 10 CFR Part 21 applicability in accordance with procedure PI-AA-204 to determine significance level, prioritization, issue ownership, and required action.

PI-AA-204 defines the processes for identifying, screening, and documenting unexpected or unwarranted conditions. It describes actions required for personnel direction and establishes roles and responsibilities for initiating and screening condition reports. Step 4.1 states that personnel should correct any identified condition to the extent possible as soon as practical. PI-AA-205 provides direction for using the condition reporting process to investigate and take appropriate corrective actions to address undesirable conditions. Step 4.9.1 stats that, in part, that closer of corrective actions in not permitted until corrective actions are completed as prescribed.

ENG-QI 2.6 provides instructions for the initial assessment, evaluation, and processing of CRs assigned to engineering. Section 5.5.3, which discusses the evaluation and documentation of corrective actions, states, in part, that a 10 CFR SSH evaluation is required only if a basic component is involved and a defect or noncompliance with regulations is involved.

WM-AA-201 provides the work control process for identifying, screening, and validating work requests. Step 3 in Section 4.0 of WM-AA-201 states, in part, that all site personnel are expected to initiate action requests for identified deficiencies related to plant equipment or facilities. There was no link between this procedure and PI-AA-04, PI-AA-205, or a 10 CFR Part 21 procedure.

PI-JB-1000 provides guidance for screening action requests, completing assignments, and obtaining MRC reviews of evaluations.

The NRC inspection team noted that although QI-2-NNP-01 states that conditions are screened for 10 CFR 21 applicability per procedure PI-AA-204, actual procedural guidance for 10 CFR Part 21 screening was not contained in this procedure. Additionally, PI-AA-204 and PI-AA-205 provided no procedural connection to ENG-QI-2.5, WM-AA-201, and PI-JB-1000. These procedures provide detailed instructions for initial assessment, screening, and evaluation of condition reports that are not included in PI-AA-204 and PI-AA-205. The NRC inspection team identified that the lack of procedural guidance in PI-AA-204 and PI-AA-205 was not in accordance with the QI-2-NNP-01.

b.2 Implementation of Corrective Action Program

While reviewing a sample of AR reports, the NRC inspection team noted that FPL failed to identify deviations and screen conditions for 10 CFR Part 21 applicability, as described in Section 6.15 of QI-2-NNP-01. Specifically, the AR forms documented the unidentified and unwarranted conditions, but failed to label the unidentified and unwarranted conditions as deviations. Additionally, the AR reports contained a box to identify whether 10 CFR Part 21 applied to identified conditions, but FPL lacked procedural guidance in PI-AA-204 and PI-AA-205 to determine whether the Part 21 box applied to the identification of a deviation or an issue with FPL's Part 21 program. For example, in AR 01622965, conditions identified as dealing with FPL's Part 21 program were inconsistently screened as applying to 10 CFR Part 21. The NRC inspection team concluded that the lack of adequate procedural guidance resulted in inadequate implementation of FPL's CAP. The NRC inspection team

identified this issue as an example of Violations 05200040/2011-201-02 and 05200041/2011-201-02.

The NRC inspection team also noted that FPL failed to correct conditions adverse to quality in an adequate and timely manner, as described in PI-AA-205. Specifically, in AR 00477542, FPL identified a condition adverse to quality regarding the storage of QA records. This condition adverse to quality was screened by the IST and MRC and then closed. The NRC inspection team identified that this issue was not corrected in accordance with PI-AA-205, given that the discovery of QA record management issues that were previously addressed in AR 0477542 still existed. The NRC inspection team identified this issue as another example of Violations 05200040/2011-201-02 and 05200041/2011-201-02.

c. Conclusions

The NRC inspection team concluded that FPL is not implementing its Corrective Action Program consistent with the requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. The NRC inspection team issued Violations 05200040/2011-201-02 and 05200041/2011-201-02 for FPL's failure to establish measures to ensure conditions adverse to quality, such as deviations and nonconformances are promptly identified and corrected. Specifically, FPL failed to promptly correct nonconformances identified in closed Action Request 00477542, "Control of RAI, RFI, and NRC Correspondence QA Records," dated May 11, 2010. In addition, FPL failed to correctly identify and document the existence of deviations in AR 01622965.

7. Audits

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL and Bechtel audits process in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of FPL's audits process to verify compliance with Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, dated October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of the PTN 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010

- NA-AA-203-1000, "Performance of Nuclear Oversight Audits," Revision 2, dated November 8, 2010

- NA-AA-202-1000, "Audit Topic Selection and Scheduling," Revision 2, dated October 28, 2010

- NA-AA-204-1000, "Findings," Revision 2, dated November 8, 2010

- NA-AA-207-1000, “Auditor Qualification and Certification,” Revision 0, dated February 7, 2011
- Bechtel Nuclear Quality Assurance Manual, Revision 4, dated November 11, 2002

- Florida Power & Light Company, Turkey Point Combined Operating License Project, Bechtel Job No. 25409, Quality Assurance Program Plan, Revision 1, dated June 8, 2009

In addition, the NRC inspection team selected the following internal audits performed during the preparation of the TP Units 6 and 7 COLA for review:

- Turkey Point Nuclear Oversight Report – New Nuclear Projects Programs and Licensing Audit – Report No. PTN-10-011, dated May 17, 2010 (audit performed April 1-2, 2010)

- Review of New Nuclear Project Quality Assurance Plan for Conformance to NRC Requirements – Quick Hit Report No. 2009-15001, dated May 17, 2009 (audit performed April 28-29, 2009)

- Juno Beach Nuclear Assurance Quality Report – New Plant Procurement Activities – Report No. 08-001, dated March 28, 2008

- FPL/NextEra Energy Nuclear Oversight Surveillance Report – Report No. PQA 10-106, dated April 8, 2010

- Bechtel Quality Surveillance Report, Surveillance No. 25409-QSHS-09-002, dated May 28, 2009 (audit performed May 19-21, 2009)

b. Observations and Findings

b.1 Policies and Procedures

Section C, “Assessments,” of the QATR establishes requirements for a program of planned and periodic performance-based independent assessments to monitor overall performance and confirm that activities affecting quality comply with the QAP and that the QAP is effectively implemented. This program is, itself, reviewed for effectiveness as part of the overall assessment process. Both self-assessments and independent assessments are accomplished using instructions or procedures that provide detail commensurate with the assessed activity’s complexity and importance to safety.

Section 6.18 of QI-2-NNP-01 states, in part, that NNP commits to the applicable requirements established in Section C of the QATR and that audits and surveillances will be conducted of suppliers on the NEE QSL and internal NEE activities, with surveillance activities conducted on sub tier suppliers.

NA-AA-202-1000 provides instructions for selecting and scheduling topics for NO audits. Audit topic selection is performed in accordance with requirements in the QATR using either the fixed schedule or the flexible scheduling process. This procedure also ensures that: (1) applicable elements of the QAP are audited at least once every two years or once within the life of an activity requiring oversight, whichever time is the shortest; and (2) audits of selected operational phase activities are performed at a frequency commensurate with safety significance and performance.

NA-AA-204-1000 provides detailed information for the identification, documentation, transmittal, and follow up of findings identified by nuclear oversight personnel. This procedure applies to findings identified during audits, surveillances, or technical reviews performed by the nuclear oversight organization. This procedure also establishes that nuclear oversight personnel are responsible for identifying and documenting conditions adverse to quality, conditions not adverse to quality, and significant conditions adverse to quality during the performance of oversight activities, such as audits, technical reviews, and routine surveillances.

b.2 Internal Audits

FPL established an internal audit program under Section C of the QATR, as implemented by NA-AA-203-1000. This procedure provides general timeliness requirements for the conduct of audits and identifies requirements for audit team composition and qualifications. It also provides guidance for preparing audit plans, making audit notifications, assembling audit checklists, performing audits, and reporting conditions potentially adverse to quality, as well as for audit closeout and documentation. NA-AA-203-1000 also refers to NA-AA-202-1000 for guidance on audit topic selection and scheduling.

The NRC inspection team reviewed a sample of internal audit reports performed in support of the TP Units 6 and 7 COLA to verify that internal audits were performed in accordance with program requirements. For each of the audits reviewed, the NRC inspection team verified that the audit reports identified audit findings and corrective actions associated with these findings. The NRC inspection team also verified that audits were conducted using a checklist to ensure that all applicable regulatory and quality requirements and criteria were evaluated. The checklists contained an adequate level of objective evidence to support the classification of checklist criteria as satisfactory or unsatisfactory. The NRC inspection team noted that corrective actions were taken promptly to respond to any identified findings and the reports contained an adequate level of objective evidence to support closing of the condition. The NRC inspection team also verified that the audit plan identifying the audit scope, focus, and applicable criteria had been prepared and approved before initiation of the audit or surveillance activity.

The NRC inspection team verified that FPL had established a 2011 audit and surveillance schedule which included all functional areas currently being performed by FPL or Bechtel in relation to the TP Units 6 and 7 COLA, along with the applicable quality criteria from Appendix B to 10 CFR Part 50. The 2011 audit and surveillance schedule meets the frequency requirements delineated in the QATR and associated implementing procedures.

b.3 Auditor Training and Qualification

NA-AA-207-1000 establishes the requirements for the qualification and certification of auditors and lead auditors. The NRC inspection team reviewed a sample of lead auditor and auditor qualifications and training records and confirmed that auditing personnel had completed all required training and maintained qualification and certification in accordance with FPL's policies and procedures. The NRC inspection team also verified that audit teams selected by FPL were sufficiently qualified to evaluate areas within the scope of the audit and that the auditors were not auditing their own work.

c. Conclusions

The NRC inspection team concluded that the implementation of FPL's internal audit process is consistent with the regulatory requirements of Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50. Based on the sample of documents reviewed, the NRC inspection team determined that FPL is effectively implementing its policies and procedures in support of the TP Units 6 and 7 COLA. No findings of significance were identified.

8. Quality Assurance Records

a. Inspection Scope

The NRC inspection team reviewed the implementation of the FPL QA records process in support of the COLA for TP Units 6 and 7. Specifically, the NRC inspection team reviewed the policies and procedures governing the implementation of FPL's QA records process to verify compliance with Criterion XVII, "Quality Assurance Records," of Appendix B to 10 CFR Part 50.

The NRC inspection team reviewed the following documents for this inspection area:

- Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC, "Quality Assurance Topical Report," FPL-1, Revision 8, dated October 22, 2010

- QI-2-NNP-01, "Quality Assurance During the Pre-Construction Phase of PTN the 6 & 7 New Nuclear Project," Revision 2, dated November 1, 2010

- NNP-PI-03, "Project Document Retention," Revision 1, dated September 10, 2010

- QI 17-PTN-1, "Quality Assurance Records," Revision 2, dated October 11, 2010

- QI 17-NSC-1, "Quality Assurance Records," Revision 5A, dated February 11, 2008

b. Observations and Findings

b.1 Policies and Procedures

Section B.15, "Records," of the QATR establishes the measures and governing procedures to ensure that sufficient records of items and activities affecting quality are generated and maintained to reflect completed work. Such records may include, but are not limited to, design, engineering, procurement, manufacturing, construction, inspection, test, installation, modification, operations, maintenance, corrective action, assessment, and associated reviews. The provisions establish requirements for records administration, including generation, receipt, preservation, storage, safekeeping, retrieval, and final disposition.

Section 6.18 of QI-2-NNP-01 states, in part, that NNP commits to the applicable requirements established in Section B.15 of the QATR. Records shall be maintained that support the achievement of quality on all project activities. QA records will be processed in accordance with QI 17-PTN-1, with the TP site as the current long-term storage and control location.

NNP-PI-03 states, in part, that records associated with the preparation of the COLA and the NRC review and approval of the COLA shall be retained for the life of the plant.

QI 17-PTN-1 states, in part, that sufficient records shall be maintained to furnish documentary evidence of the quality of safety-related SSCs and that QA records should be transmitted to site document control within 30 days after completion, unless approved otherwise by the site document control supervisor. Additionally, QI 17-PTN-1 establishes the requirements for managing and transferring controlled documents into the official records management system (RMS). It specifies Lotus Notes as the RMS for listing and tracking QA records and specifies Turkey Point Nuclear Plant as the data entry point and storage facility. QI 17-PTN-1 emphasizes FPL's commitment to the guidance of NRC Regulatory Guide 1.28, Revision 3, "Quality Assurance Program Criteria (Design and Construction)," issued August 1985.

QI 17-NSC-1 states, in part, that this procedure provides requirements and guidance regarding the generation, transmittal, processing, and retention of QA records and describes the interfaces between the nuclear supply chain and the records management organization.

b.2 Implementation of Quality Assurance Records Process

The NRC inspection team reviewed a sample of several records, including training records and TP AP1000 DCD departure packages. The NRC inspection team also conducted interviews with FPL's staff and management responsible for the implementation of the QA records process. During this review, the NRC inspection team verified that FPL had implemented a QA records process for the administration, identification, receipt, storage, preservation, safekeeping, and disposition of records. The NRC inspection team also verified that the FPL RMS had the capacity to maintain the integrity, authenticity, and acceptability of QA records during the required retention period.

During the review of the training records and TP AP1000 DCD departure packages, the NRC inspection team noted that these records were not being maintained in accordance with QI 17-PTN-1. Specifically, these records were being maintained in temporary storage for longer than 30 days (in excess of 19 months) instead of being forwarded to the long term storage facility within 30 days of issuance as required by the procedure. The NRC inspection team identified this issue as an example of Violations 05200040/2011-201-02 and 05200041/2011-201-02 for FPL's failure to correct conditions adverse to quality in an adequate and timely manner as previously described in Section 6.b.2 above.

c. Conclusions

With the exception of Violations 05200040/2011-201-02 and 05200041/2011-201-02 in relation to FPL's failure to correct conditions adverse to quality associated with storage of QA records in an adequate and timely manner, the NRC inspection team concluded that the implementation of FPL's QA records program is consistent with the regulatory requirements of Criterion XVII, "Quality Assurance Records," of Appendix B to 10 CFR Part 50.

Entrance and Exit Meetings

On February 28, 2011, the NRC inspection team presented the inspection scope during an entrance meeting with Mr. Bill Maher, Senior Director for Licensing, and other FPL and Bechtel personnel. On March 4, 2011, the NRC inspection team presented the inspection results during an exit meeting with Mr. Bill Maher, and other FPL and Bechtel personnel.

ATTACHMENT 1

1. PERSONS CONTACTED

NAME	COMPANY	TITLE	ENTRANCE MEETING	EXIT MEETING	INTERVIEWED
Bill Maher	FPL	New Nuclear Projects Licensing Senior Director	√	√	√
Steve Franzone	FPL	New Nuclear Projects Licensing Manager	√	√	√
Rich Weiss	FPL	QA Supervisor	√	√	√
Shiela Schlafly	FPL	Principal Quality Engineer			√
George Madden	FPL	Licensing Engineer	√		√
Ray Burski	FPL	Licensing Engineer	√	√	√
Rick Orthen	FPL	Licensing Engineer	√	√	
Tom Childress	FPL	Licensing Engineer	√	√	
Joeri Carty	FPL	Standardization Manager			√
Jim Connolly	FPL	Fleet Licensing Manager	√	√	
Paul Jacobs	FPL	Engineering Supervisor	√	√	
Basil Pagnozzi	FPL	Engineering Chief Staff	√	√	
Wallace Woodward	FPL	Nuclear Assurance	√		
Dominick Fuca	FPL	Manager Performance Assessment	√	√	√
Pete Wells	FPL	VP Organizational Support	√		
Jennifer Schaffer	FPL	Performance Improvement Trending Coordinator			√
Tom Rohe	FPL	Performance Improvement			√
Elizabeth Paine	FPL	Administrative Support	√		
Raj Jolly	Bechtel	Project QA Manager	√	√	√
John Cunliffe	Bechtel	Project Manager	√	√	
Bob Yamrus	Bechtel	Project Engineer	√		
Yamir Diaz-Castillo	NRC	Inspection Team Leader	√	√	

NAME	COMPANY	TITLE	ENTRANCE MEETING	EXIT MEETING	INTERVIEWED
Kerri Kavanagh	NRC	Inspector	√	√	
Stacy Smith	NRC	Inspector	√	√	
Marlayna Vaaler	NRC	Inspector	√	√	
Brent Clarke	NRC	Inspector	√	√	
Manny Comar	NRC	NRC Senior Project Manager	√		

2. INSPECTION PROCEDURES USED

Inspection Procedure 35017, "Quality Assurance Implementation Inspection," dated July 29, 2008.

Inspection Procedure 36100, "Inspection of 10 CFR Part 21 and 50.55(e) Programs for Reporting Defects and Noncompliance," dated October 3, 2007.

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

The NRC had not performed any previous implementation inspections of the QA program governing the COLA for TP Units 6 and 7.

Item Number	Status	Type	Description
05200040/2011-201-01	Opened	NOV	Violation of Part 21
05200041/2011-201-01	Opened	NOV	Violation of Part 21
05200040/2011-201-02	Opened	NOV	Criterion XVI
05200041/2011-201-02	Opened	NOV	Criterion XVI

4. LIST OF ACRONYMS USED

AR	action request
ASME	American Society of Mechanical Engineers
CAP	corrective action program
CFR	*Code of Federal Regulations*
COLA	combined license application
CR	condition report
DCD	design control document
FPL	Florida Power & Light
FSAR	final safety analysis report
IP	inspection procedure
IST	Initial Screening Team
LRB	licensing review board
MRC	Management Review Committee
NAMS	Nuclear Asset Management System
NEE	NextEra Energy

NNP	New Nuclear Project
NO	nuclear oversight
NUPIC	Nuclear Utilities Procurement Industry Committee
NRC	U.S. Nuclear Regulatory Commission
OSC	operations support center
PO	purchase order
QA	quality assurance
QAP	quality assurance program
QATR	quality assurance topical report
OSC	operations support center
QSL	qualified suppliers list
RMS	records management system
SQAD	special quality assurance document
SSC	structure, system, and component
SSH	substantial safety hazard
TP	Turkey Point
TSC	technical support center
WEC	Westinghouse Electric Company

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