



Status Meeting on Turkey Point Units 6 & 7 Final Safety Analysis Report (FSAR) Section 2.5

Bill Maher

Sr. Director – New Nuclear Projects

July 24, 2012

Agenda

- **Introduction and Overview**
- **Schedule and Plan for Submittals**
- **QA Audit Results, Corrective Actions and Changes**

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Three major groupings for Request for Additional Information (RAI) revisions

Schedule and Plan for Submittals

- **Significant Revisions**
 - FSAR 2.5.4
 - September 12
 - FSAR 2.5.1, 2.5.2
 - September 14
- **Additional Information**
 - FSAR 2.5.3
 - September 30
- **FSAR Updates**
 - September 30

Above schedules should accommodate resolution & incorporation of feedback received at Public Meeting

Agenda

- Introduction and Overview
- Schedule and Plan for Submittal
- **QA Audit Results, Corrective Actions and Changes**



FPL takes the concerns noted by the NRC Staff very seriously. FPL is committed to addressing these concerns as part of its continuing dialog with the NRC Staff.

QA Audit Results

- **Finding**
 - Inadequate review of technical responses associated with Geology, Seismology, and Geotechnical Engineering resulted in answers to RAIs that were of poor quality
- **Two groups**
 - Incomplete technical information or errors
 - Positions taken were not appropriately justified
- **Rationale**
 - COL contractor and subcontractor saw Turkey Point as seismically 'unremarkable' leading to pattern of less than rigorous support provided for positions taken with a consequent less than sufficient technical challenge
 - Approach relied on technical reviews and vendor expertise of COL contractor and subcontractor, consistent with industry practice

Corrective actions already taken to address findings and insights from QA Audit

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QA Audit Results, cont.

- **Extent of condition**
 - As of 5/18/12, 208 RAIs received
 - 110 were related to Part 2, Chapter 2
 - 98 related to balance of Part 2
 - 20% sampled
- **Some errors noted during COLA and RAI production**
 - Majority were calculational errors that form the basis for FSAR text
 - All detected and corrected by project team prior to NRC review
- **Conclusion**
 - Factors contributing to FSAR 2.5 issues are not systemic to balance of COLA
 - RAI technical issues are primarily limited to FSAR 2.5, due to nature of the subject matter

Corrective actions already taken to address findings and insights from QA Audit



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QA Audit Results Detail

- **Review of FSAR 2.5 RAI responses lacked sufficient technical evaluation**
- **Several instances where independence was not maintained in COL contractor review process**
- **Several open items from Technical Advisory Group (TAG) reviews were not closed by COL contractor**
- **Quality concerns noted by NRC or otherwise identified, not entered into COL contractor Corrective Action Program**
- **COL contractor QA oversight was not focused on the FSAR section that had the largest number of RAI's (FSAR 2.5)**

Corrective actions already taken to address findings and insights from QA Audit



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Corrective Actions and Changes

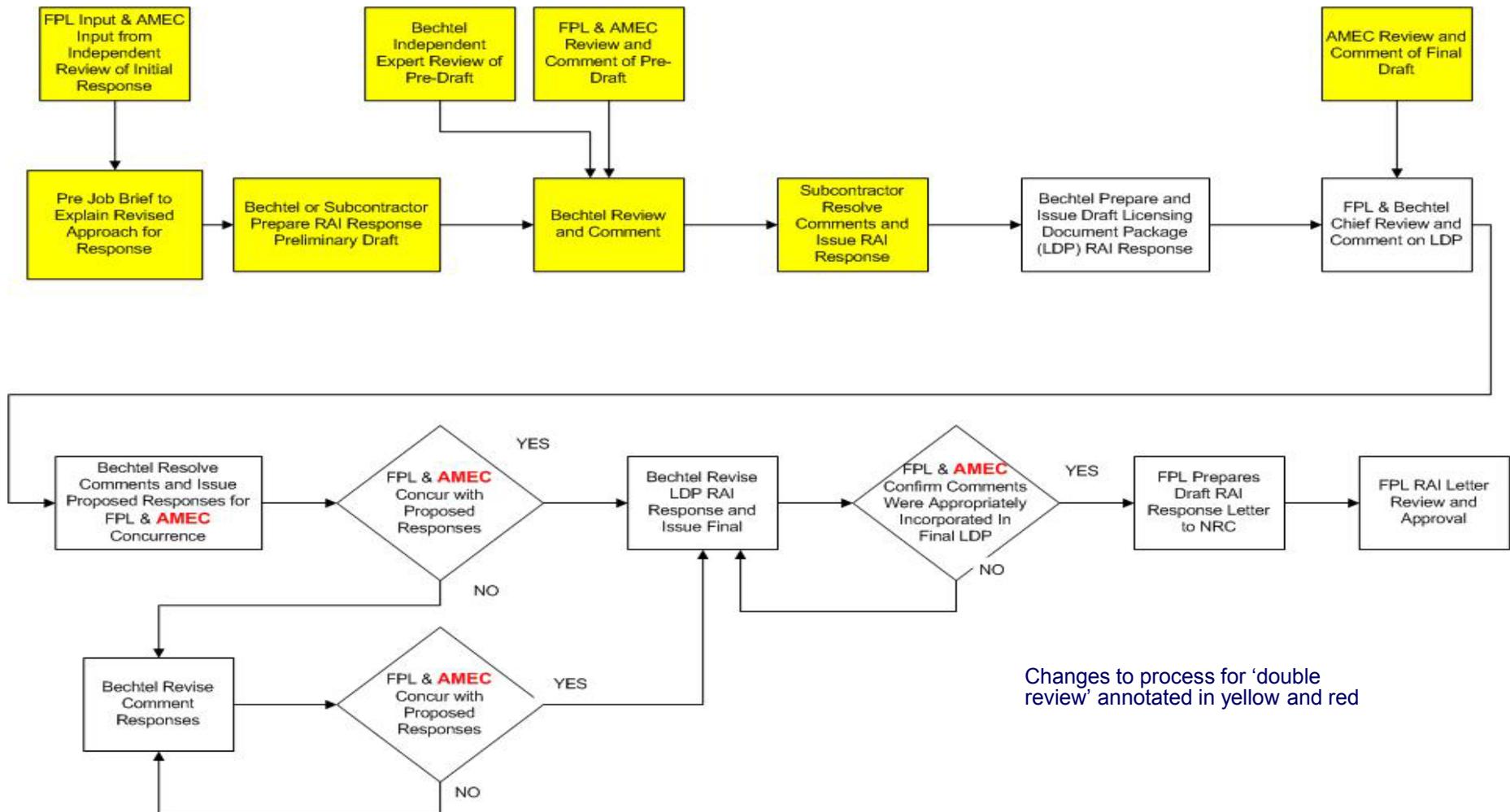
- **FPL hired technical expert**
 - Same company as performed Levy FSAR 2.5 work
 - Familiar with NRC processes, Florida geology, and seismic sources
- **FPL performed 100% review of all FSAR 2.5 RAI responses**
- **COL contractor technical review**
 - FPL directed COL contractor to perform technical evaluation of subcontractor work
- **FPL instituted “Double review” process**
- **FPL issued finding to COL contractor**
 - Review process failed to detect and correct errors
 - QA processes failed to detect and correct review process malfunctions

Corrective actions showing positive results



Modifications to RAI response review process

Corrective Actions and Changes, cont.



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Corrective Actions and Changes, cont.

- **COL contractor finding actions**
 - Engineering
 - Reviewing and investigating the finding to include an Apparent Cause evaluation
 - Determination of generic implications of finding
 - QA
 - Reviewing and investigating the finding for probable Root Cause evaluation
 - Determination of generic implications of finding
 - Reviewing QA procedures to assess surveillance requirements
 - Reviewing Turkey Point surveillance reports
 - Reviews and corrective actions completed by Oct. 2012

FPL will be reviewing COL contractor investigations and implementation





Questions?