



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE NE, SUITE 1200  
ATLANTA, GEORGIA 30303-1257

July 11, 2013

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

SUBJECT: TURKEY POINT NUCLEAR POWER PLANT - NRC EMERGENCY  
PREPAREDNESS INSPECTION REPORT 05000250/2013503 AND  
05000251/2013503

Dear Mr. Nazar:

On June 21, 2013, the U.S. Nuclear Regulatory Commission (NRC) completed an emergency preparedness inspection at the Turkey Point Nuclear Power Plant, Units 3 and 4. The enclosed inspection report documents the inspection results that were discussed on June 21, 2013, with Mr. M. Kiley and other members of plant staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings were identified during this inspection.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its Enclosure, and your response, if any, will be available electronically for public inspection in the NRC Public Document Room, or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Brian Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

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

Enclosure:  
Inspection Report 2013-503  
w/Attachment: Supplemental Information

cc: (See page 2)

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Distribution: (See next page)

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ADAMS: ☒ Yes      ACCESSION NUMBER: ML13192A039      ☐ SUNSI REVIEW COMPLETE      ☒ FORM 665 ATTACHED

OFFICE	RII:DRS/PSB1	RII:DRS/PSB1	RII:DRP/BR3	RII:DRS/OLB2	RII:DRP/BR3	RII:DRS/PSB1	
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DATE	7/ 5 /2013	7/ 8 /2013	7/ 9 /2013	7/ 2 /2013	7/ 9 /2013	7/ 10 /2013	
E-MAIL COPY	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	

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Letter to Mano Nazar from Brian Bonser dated July 11, 2013.

SUBJECT: TURKEY POINT NUCLEAR POWER PLANT - NRC EMERGENCY  
PREPAREDNESS INSPECTION REPORT 05000250/2013503 AND  
05000251/2013503

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**U.S. NUCLEAR REGULATORY COMMISSION**

**REGION II**

Docket Nos: 05000250 and 05000251

License Nos: DPR-31 and DPR-41

Report No: 05000250/2013503 and 05000251/2013503

Licensee: Florida Power and Light Company

Facility: Turkey Point Nuclear Power Plant, Units 3 and 4

Location: Florida City, FL

Dates: June 17 - 21, 2013

Inspectors: M. Speck, Senior Emergency Preparedness Inspector  
W. Loo, Senior Health Physicist  
R. Baldwin, Senior Operations Engineer  
T. Hoeg, Senior Resident Inspector

Approved by: Brian Bonser, Chief  
Plant Support Branch 1  
Division of Reactor Safety

Enclosure

## **SUMMARY OF FINDINGS**

IR 05000250/2013503 and 05000251/2013503; 06/17/2013 – 06/21/2013; Turkey Point Nuclear Power Plant, Units 3 and 4; Exercise and Baseline Inspection

The report covered an announced inspection by one emergency preparedness inspector, one senior health physicist, one senior operations engineer, and one senior resident inspector. No findings were identified.

## REPORT DETAILS

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

#### 1EP1 Exercise Evaluation

##### a. Inspection Scope

Prior to the arrival onsite, the inspectors conducted an in-office review of the exercise objectives and scenario submitted to the U.S. Nuclear Regulatory Commission (NRC) using Inspection Procedure (IP) 71114.08, Exercise Evaluation, Scenario Review, to determine if the exercise would test major elements of the emergency plan as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 50.47(b)(14).

The onsite inspection consisted of the following review and assessment:

- The adequacy of the licensee's performance in the biennial exercise, conducted on June 18, 2013, was reviewed and assessed regarding the implementation of the Risk Significant Planning Standards (RSPS) in 10 CFR 50.47 (b)(4), (5), (9), and (10) which address emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities," and Emergency Plan commitments. The facilities assessed were the Control Room Simulator, Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF).
- Other performance areas, such as: the emergency response organization's (ERO) recognition of abnormal plant conditions; command and control, intra- and inter-facility communications; prioritization of mitigation activities; utilization of repair and field monitoring teams; interface with offsite agencies; and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS) exercise reports, to determine the effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The post-exercise critique process and the presentation to the licensee's senior management conducted on June 20, 2013, to evaluate the licensee's self-assessment of its ERO performance during the exercise and to ensure compliance with 10 CFR 50, Appendix E, Subsection IV.F.2.g.

The inspectors reviewed various documents which are listed in the Attachment. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspectors sampled licensee submittals relative to the Performance Indicators (PI) listed below for the period January 1, 2012, through March 31, 2013. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, was used to confirm the reporting basis for each data element.

Emergency Preparedness Cornerstone

- Emergency Response Organization Drill/Exercise Performance (DEP)
- Emergency Response Organization Readiness (ERO)
- Alert and Notification System Reliability (ANS)

For the specified review period, the inspectors examined data reported to the NRC, procedural guidance for reporting PI information, and records used by the licensee to identify potential PI occurrences. The inspectors verified the accuracy of the DEP through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the ERO PI for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for ANS reliability through review of a sample of the licensee's records of periodic system tests. Licensee procedures, records, and other documents reviewed within this inspection area are listed in the Attachment.

The inspectors reviewed various documents and are listed in the Attachment. This inspection activity satisfied one inspection sample for each of the three Emergency Preparedness PI, i.e., DEP, ERO, and ANS, on an annual basis.

b. Findings

No findings were identified.

4OA6 Meetings, Including Exit

On June 21, 2013, the lead inspector presented the inspection results to Mr. M. Kiley, Site Vice President, and other members of the plant staff. The inspectors confirmed that proprietary information was not provided during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION



## **SUPPLEMENTAL INFORMATION**

### **KEY POINTS OF CONTACT**

#### **Licensee Personnel**

G. Bowen, EP Coordinator  
M. Downs, EP Coordinator  
M. Epstein, EP Manager  
J. Garcia, Engineering Director  
O. Hanek, Licensing Engineer  
M. Jones, System Engineering  
M. Kiley, Site Vice-President  
D. Mothena, Emergency Preparedness Corporate Functional Area Manager  
M. Wayland, Operations Director  
J. Wingate, EP Coordinator

#### **ITEMS OPENED, CLOSED, AND DISCUSSED**

None

### **LIST OF DOCUMENTS REVIEWED**

#### **1EP1 Exercise Evaluation**

##### **Procedures**

3-EOP-E-0, Reactor Trip or Safety Injection, Rev. 6  
3-EOP-FR-P.1, Response to Imminent Pressurized Thermal Shock Condition, Rev. 2  
3-EOP-E-1, Loss of Reactor or Secondary Coolant, Rev. 4  
3-EOP-ES-1.2, Post LOCA Cooldown and Depressurization, Rev. 3A  
3-ONOP-067, Radioactive Effluent Release, Rev. 6  
3-ONOP-041.4, Excessive Reactor Coolant System Activity, Rev. 2  
3-ONOP-041.5, Pressurizer Pressure Control Malfunction, Rev. 0A  
0-EPIP-1302, Core Damage Assessment, Rev. 4  
Turkey Point Plant Radiological Emergency Plan, Rev. 57  
0-EPIP-20101, Duties of Emergency Coordinator, Rev. 11  
0-EPIP-20126, Off-site Dose Calculations – Extended Power Uprate, Rev. 4  
0-EPIP-1212, Emergency Operations Facility Activation and Operation, Rev. 5  
0-EPIP-20132, Technical Support Center Activation, Rev. 6  
0-EPIP-1102, Duties of the Recovery Manager, Rev. 2  
0-EPIP-20134, Offsite Notifications and Protective Action Recommendations, Rev. 2  
0-EPIP-20133, Operations Support Center Activation and Operation, Rev. 1  
EP-AA-101-1000, Nuclear Division Drill and Exercise Procedure, Rev. 6  
0-EPIP-20111, Re-Entry, Rev. No. 1  
0-EPIP-20133, Operations Support Center (OSC) Activation and Operation, Rev. No. 1  
PI-AA-01, Corrective Action Program and Condition Reporting, Rev. No. 3  
PI-AA-204, Condition Identification and Screening Process, Rev. No. 18  
Turkey Point Plant Radiological Emergency Plan, Rev. 57

Records and Data

2011, 2012, and 2013 Emergency Exercise and drill scenario documents  
 Control Room, Technical Support Center, Operations Support Center, Joint Information Center  
 Emergency Operations Facility - Documentation packages (logs, event notification forms  
 Protective Action Recommendations, Media releases, and Radiological Dose Assessments)  
 NRC/FEMA 2013 Graded Exercise Management Debrief

Corrective Action Program documents

1882927, Extra security seals were left above the RP equipment cabinets  
 1883611, TSC alternate route not announced  
 1883623, ADM-115 notification sent without "this is a drill"  
 1883625, Release source not recognized  
 1883627, PAR upgrade missed  
 1883628, Dose extension process inefficient  
 1883632, Fire brigade response not as expected  
 1883636, Evaluate process to transition to emergency RWP  
 1883637, Need JPM for chemistry post-accident sample  
 1883638, TSC minimum staff having dual role  
 1883640, Evaluate applicability of 50.54x when transitioning from cold leg to hot leg injection  
 1883642, TSC HVAC configuration control  
 1883643, WebEOC issues  
 1883783, Release information to states following release  
 1883884, EP-AA-101-1000 missing objectives  
 1883909, Expected behavior of re-entry teams  
 1883644, Simulator observations  
 1883645, TSC observations  
 1883647, OSC observations  
 1883649, EOF observations  
 1883650, Common facility observations  
 1883668, Drill scenario areas for improvement  
 1884141, Drill inspection observations  
 1884164, FPL Press release observations

**Section 40A1: Performance Indicator Verification**Procedures

0-ADM-032, NRC Performance Indicators Turkey Point, Rev. 4A  
 EP-AD-011, Instructions for Maintaining the Emergency Preparedness NRC Performance  
 Indicators, Rev. 26

Records and Data

Drill and Exercise Performance opportunities documentation from 1<sup>st</sup> Quarter 2012, through  
 1<sup>st</sup> Quarter 2013  
 Drill and exercise participation records of ERO personnel from 1<sup>st</sup> Quarter 2012, through  
 1<sup>st</sup> Quarter 2013  
 Siren Test Data from 1<sup>st</sup> Quarter 2012 through 1<sup>st</sup> Quarter 2013

Corrective Action Program documents

1882916, 1<sup>st</sup> quarter 2013 ERO data mismatched with a late change

1884143, Inspection PI observations

1883464, Siren test failures ARs not written

1883669, PI documentation improvements

**LIST OF ACRONYMS USED**

ANS	Alert and Notification System
DEP	Drill and Exercise Performance
DHS	Department of Homeland Security
EOF	Emergency Operations Facility
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
OSC	Operations Support Center
PI	Performance Indicator
RSPS	Risk Significant Planning Standard
TSC	Technical Support Center