

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

July 18, 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: ST LUCIE PLANT - NOTIFICATION OF INSPECTION AND REQUEST FOR INFORMATION

Dear Mr. Nazar:

During the weeks of September 16 – 20 and September 30 – October 4, 2013, the U.S. Nuclear Regulatory Commission (NRC) will perform a baseline Radiation Safety Inspection at the Plant St. Lucie site (Inspection Procedures 71124.01, 71124.02, 71124.03, 71124.04, 71124.05 and Radiation Safety Sections of 71151). In order to minimize the impact to your onsite resources and to ensure a productive inspection, we have enclosed a request for documents needed for this activity. The NRC requests that these documents be provided to the inspectors no later than September 4, 2013.

We have discussed the schedule for these inspection activities with your staff and understand that our regulatory contact for this inspection will be Don Cecchet of your organization. If there are any questions about this inspection or the material requested, please contact the lead inspector, William Pursley at (404) 997-4517, or the Plant Support Branch 1 Chief, Brian Bonser at (404) 997-4653.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control numbers 3150-0044, 3150-0014, 3150-0011, and 3150-0008. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

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, and its Enclosure, will be available electronically for

public inspection in the NRC Public Document Room, or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC web site at <u>http://www.nrc.gov/reading-rm/adams.html</u>.

Sincerely,

## /RA by Steven B. Rudisail Acting for/

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

Docket Nos. 50-335 and 50-389 License Nos. DPR-67 and NPF-16

Enclosure: Document Request List

cc: (See page 3)

public inspection in the NRC Public Document Room, or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC web site at <u>http://www.nrc.gov/reading-rm/adams.html</u>.

Sincerely,

/RA by Steven B. Rudisail Acting for/

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

Docket Nos. 50-335 and 50-389 License Nos. DPR-67 and NPF-16

Enclosure: Document Request List

cc: (See page 3)

DISTRIBUTION: D. Rich, RII, DRP S. Sandal, RII, DRP M. Riches, RII, DRP P. Carman, RII, DRP T. Hoeg, RII, SRI M. Endress, RII, RI C. Evans, RII, EICS L. Douglas, RII, EICS RIDSNRRDIRS PUBLIC RidsNrrPMStLucie Resource

X PUBLICLY AVAILABLE IN NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE		
ADAMS: X Yes ACCESSION NUMBER: <u>ML13199A420</u> X SUNSI REVIEW COMPLETE X FORM 665 ATTACHE		X NON-SENSITIVE X FORM 665 ATTACHED

OFFICE	RII:DRS/PSB1	RII:DRS/PSB1			
SIGNATURE	WSP1 via e-mail	SBR for BRB1			
NAME	W. Pursley	B. Bonser			
DATE	7/ 18 /20103	7/ 18 /2013			
E-MAIL COPY	YES NO	YES NO			

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DRSII\PSB1\RFI INFORMATION REQUEST LETTERS\ST LUCIE\STL PSB1 RS NOI AND RFI 13-04.DOCX

cc: Joseph Jensen Site Vice President St. Lucie Nuclear Plant Electronic Mail Distribution

Paul Freeman Vice President Organizational Effectiveness Florida Power & Light Company Electronic Mail Distribution

Peter Wells Vice President Outage Support CFAM Florida Power & Light Company Electronic Mail Distribution

Robert J. Hughes Plant General Manager St. Lucie Nuclear Plant Electronic Mail Distribution

Daniel D. DeBoer Operations Site Director St. Lucie Nuclear Plant Electronic Mail Distribution

Eric Katzman Licensing Manager St. Lucie Nuclear Plant Electronic Mail Distribution

Larry Nicholson Director Licensing Florida Power & Light Company Electronic Mail Distribution

Alison Brown Nuclear Licensing Florida Power & Light Company Electronic Mail Distribution Cynthia Becker (Acting) Chief Florida Bureau of Radiation Control Department of Health Electronic Mail Distribution

Bryan Koon Director Florida Division of Emergency Management Electronic Mail Distribution

Donna Calabrese Emergency Preparedness Manager St. Lucie Plant Electronic Mail Distribution

J. Kammel Radiological Emergency Planning Administrator Department of Public Safety Electronic Mail Distribution

Senior Resident Inspector St. Lucie Nuclear Plant U.S. Nuclear Regulatory Commission P.O. Box 6090 Jensen Beach, FL 34957-2010

Michael Baughman Training Manager St. Lucie Nuclear Plant Electronic Mail Distribution

Faye Outlaw County Administrator St. Lucie County Electronic Mail Distribution

James Petro Managing Attorney-Nuclear Florida Power & Light Company Electronic Mail Distribution

Jack Southard Director Public Safety Department St. Lucie County Electronic Mail Distribution

## **Document Request List**

Inspection Dates:	September 16 - 20 and September 29 – October 4, 2013			
Documents Due to Region II by:	September 4, 2013			
Inspection Procedures:	IP 71124.01	Radiological Hazard Assessment and Exposure Controls		
	IP 71124.02	Occupational ALARA Planning and Controls		
	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation		
	IP 71124.04	Occupational Dose Assessment		
	IP 71124.05	Radiation Monitoring Instrumentation		
	IP 71151	Performance Indicator Verification		
Lead Inspector:	William Pursley Health Physicist US NRC Region II (404) 997-4517 William.Pursley@nrc.gov			

**Note:** The current version of these documents is expected unless specified otherwise. Electronic media is preferred if readily available. *Note that the inspectors cannot accept data provided on USB or "flash" drives due to NRC IT security policies.* Please organize the information as it is arranged below to the extent possible. Experience has shown that a poorly organized CD leads to a less efficient inspection and places additional burden on licensee staff. Pay particular attention to the date ranges for the items requested as they change from item to item. If there are questions regarding the documents requested, please do not hesitate to contact the lead inspector.

### **Miscellaneous**

- 1. List of primary contacts for each inspection area w/phone numbers.
- 2. Corrective action program procedure.
- 3. Outage schedule of major activities. (Gantt chart if available)
- 4. Most recent 10 CFR 61 results for the DAW waste stream.

### 71124.01 - Radiological Hazard Assessment and Exposure Controls

- 1. List of outage RWPs.
- Procedures related to HP controls. (e.g., Posting, labeling, surveys, RWPs, contamination control, HRA/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.)
- 3. Procedures related to release of personnel and materials. (e.g., release surveys, decontamination, guidance for alarm followup, etc.)
- 4. List of Nationally Tracked Sources and any change-of-ownership transactions.
- 5. Inventory list of all sealed sources stored onsite.
- 6. List of all non-fuel items stored in spent fuel pool.
- 7. HP plan for monitoring and controlling hazards associated with potential fuel leakers during the upcoming outage.

- 8. Most recent self-assessment or audit covering hazard assessment and exposure controls.
- List of NCRs related to HP controls (e.g., radworker error, HP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) issued since <u>March 2012</u>. This should be a list of corrective action documents containing an AR number and brief description, not full NCRs.

## 71124.02 - Occupational ALARA Planning and Controls

- 1. All procedures related to ALARA. (e.g., temporary shielding, ALARA planning, source term reduction, etc.)
- 2. List of top 5 dose jobs for the upcoming refueling outage and ALARA planning packages (including dose estimates, work hour estimates, special HP controls, and dose reduction initiatives), if available.
- 3. List of temporary shielding requests generated for the upcoming outage.
- 4. ALARA trending point data for last two outages.
- 5. Source term reduction strategic plan, if available.
- 6. Minutes from the last 4 Plant ALARA Committee Meetings.
- 7. Post-outage ALARA report for the last Unit 1 and Unit 2 refueling outages.
- 8. Annual ALARA goal for 2013 and the methodology utilized to make the projections.
- 9. Completed ALARA packages (including post-job reviews) for 5 work activities completed during the last Unit 1 outage which had the greatest collective dose. [Note: If these are included in Item 7, then there is no need to provide duplicate information.]
- 10. Most recent self-assessment or audit of ALARA program.
- 11. List of NCRs related to ALARA since <u>March 2011</u>. This should be a list of corrective action documents containing an AR number and brief description, not full NCRs.

## 71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

- 1. Procedures related to airborne monitoring and control (e.g., use of containment purge, use of portable HEPA/charcoal units, temporary ventilation enclosures, use of CAMs, air sampling guidance, Alpha air sampling, etc.), as applicable.
- 2. Procedures related to the use of respiratory protection devices. (e.g., SCBA, TEDE-ALARA guidance, PAPRs, storage, maintenance, training, QA, fit-testing, etc.)
- 3. The last 2 grade D air testing certificates for supplied air systems and SCBA filling equipment.
- 4. SCBA qualification records:
  - a) Vendor training certificates for all onsite individuals qualified to repair SCBA.
  - b) List of all licensed operators qualified to use SCBA.
  - c) List of all maintenance personnel qualified to use SCBA.
  - d) List of all HP personnel qualified to use SCBA.
- 5. Documentation for last 2 surveillances performed on SCBA stored for emergency use.
- 6. Most recent audit or self-assessment covering airborne controls and respiratory protection.
- 7. List of NCRs related to airborne monitoring and respiratory protection since <u>March 2011</u>. *This should be a list of corrective action documents containing an AR number and brief description, not full NCRs.*

## 71124.04 – Occupational Dose Assessment

1. Procedures related to occupational dose assessment. (e.g., external dose monitoring, dosimetry issuance and use, unusual dosimetry occurrences, multi-badging/extremity dosimetry/badge relocation, Effective Dose Equivalent, personnel contamination events,

storage/care of personal dosimeters, use of electronic dosimeters, *in-vivo* and *in-vitro* internal dose assessment, skin dose assessment, QC for whole body counter, use of passive monitoring if applicable, declared pregnant workers)

- 2. NVLAP accreditation documentation for current dosimetry used by site.
- 3. List of all positive whole body counts, in vitro, or air sampling analyses which resulted in an assigned CEDE equal to or exceeding 10 millirem since <u>March 2011</u>. [Note: Only a listing should be provided for use by the inspectors to select a sample of issues for in-depth review during the onsite inspection.]
- 4. List of all personnel contamination events identified since <u>March 2011</u>. Include full documentation for any PCEs requiring skin dose assessment. [Note: Only a listing should be provided for use by the inspectors to select a sample of issues for in-depth review during the onsite inspection, however, please include full dose assessment documentation as applicable.]
- 5. Most recent audit or self-assessment of the dosimetry program and the most recent audit of the lab that processes site dosimetry.
- 6. List of NCRs generated since <u>March 2011</u>, for internal or external dosimetry issues/events. *This should be a list of corrective action documents containing an AR number and brief description, not full NCRs.*

## 71124.05 - Radiation Monitoring Instrumentation

- 1. Procedures/Guidance Documents for:
  - a) Use of portable instrument calibrators. (e.g., Shepherd calibrator)
  - b) Calibration and functional test/source checks of portable radiation detection instrumentation.
  - c) Calibration and functional tests of small article monitor, personnel contamination monitor, portal monitor, whole body counting equipment, and continuous air monitors.
  - d) Determination of set-points for the equipment identified in item 1(c) as well as for area radiation monitors.
  - e) Collection and analysis of high-range, post-accident effluent samples.
  - f) QA program for count room instruments.
- 2. The <u>last 2</u> calibration records for the following monitors:
  - a) Unit 1 Post-accident Drywell High Range Area Monitor.
  - b) Main Stack Monitor and Associated Sample Line Flow Rate Monitor(s).
  - c) Unit 2 Reactor Building Roof Vent Monitor.
  - d) Radwaste Liquid Effluent Radiation Monitor.
  - e) Unit 1 TIP Room Area Monitor.
  - f) Portal Monitor Used in Dosimetry for Passive Monitoring.
  - g) All SAMs at RCA exit point.
  - h) All Whole Body Contamination Monitors (ARGOS) at RCA exit point.
  - i) All Portal Monitors at RCA exit point.
  - j) High-purity Germanium Detector No. 3.
- Documentation for the radioactive sources used to calibrate the above requested monitors showing traceability to a national standard (NIST) and traceability to the primary calibration, as applicable.
- 4. The last 2 surveillances performed on the Post-accident Sampling System, as applicable.
- 5. Chart or procedure listing EALs for radiation monitoring equipment.

- 6. The latest test record of the instrument calibrator (Shepherd validation testing/dose rate curves).
- 7. Latest system health report or Maintenance Rule report for the Radiation Monitoring system.
- 8. Most recent audit or self-assessment covering HP instruments (portables, RCA exit point, WBC, count room). Include any reviews conducted of vendor facilities, as applicable.
- 9. List of NCRs generated since <u>March 2011</u> related to portable instruments, effluent and area monitors, CAMs, RCA release point monitors, WBCs, and count room instruments. *This should be a list of corrective action documents containing an AR number and brief description, not full NCRs.*

PI Verification (occupational and public cornerstones)

- 1. Procedure for gathering and reporting PI data.
- 2. List of all NCRs related to effluent dose/ODCM issues since March 2012. This should be a list of corrective action documents containing an AR number and brief description, not full NCRs.
- 3. List of all NCRs related to LHRA/VHRA issues or significant (>100 mrem) unintended doses since March 2012. This should be a list of corrective action documents containing an AR number and brief description, not full CRs.
- 4. Most recent gaseous and liquid effluent release permits showing year-to-date doses to the public.
- 5. 2012 Annual Radioactive Effluent Report OR an end-of-year public dose report if the official Effluent Report is not ready yet.
- 6. List of electronic dosimeter alarms since March 2012. (dose and dose rate)