



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

April 6, 2021

EA-20-043
EA-20-150

Mr. Don Moul, Executive Vice President
Nuclear Division and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop: EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: TURKEY POINT NUCLEAR GENERATING STATION - NOTICE OF VIOLATION
AND PROPOSED IMPOSITION OF CIVIL PENALTY – \$150,000, NRC
INSPECTION REPORT NOS. 05000250/2021090 AND 05000251/2021090;
INVESTIGATION REPORT NOS. 2-2019-011 AND 2-2019-025; EXERCISE OF
ENFORCEMENT DISCRETION

Dear Mr. Moul:

This letter is in reference to three apparent violations (AVs) identified as a result of two separate investigations completed by the Nuclear Regulatory Commission's (NRC) Office of Investigations (OI) concerning activities at Florida Power and Light Company's (FPL) Turkey Point Nuclear Generating Station (Turkey Point).

The first AV was related to an OI investigation completed on March 10, 2020. The investigation was conducted to determine if three mechanics at Turkey Point Unit 3 deliberately falsified information in a work order package associated with the January 23, 2019, inspection and maintenance of a safety-related check valve. The details of the AV and investigation are documented in NRC Inspection Report 05000250/2020011 and 05000251/2020011, issued on July 23, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20205L316). The AV involved the recording of inaccurate/incomplete information associated with maintenance and inspection of a safety-related auxiliary feedwater check valve, contrary to the requirements of 10 CFR 50.9(a), "Completeness and Accuracy of Information."

On March 3, 2021, a pre-decisional enforcement conference (PEC) was conducted via teleconference at FPL's request, with members of your staff to discuss the AV. The conference was closed to public observation because the subject matter was related to an OI report, the details of which have not been publicly released. At the conference, FPL accepted the violation as described in the inspection report including the willful aspects, provided its assessment of the significance of the violation, discussed the root and contributing causes, provided additional circumstances regarding identification of the violation, and discussed several corrective actions taken in response to the incident.

The second and third AVs were related to an OI investigation completed on November 10, 2020. The investigation was conducted to determine whether two instrumentation and control (I&C) technicians at Turkey Point deliberately provided incomplete or inaccurate information in maintenance records, and whether the I&C technicians, an I&C Supervisor, and the I&C Department Head deliberately failed to immediately notify the main control room of a mispositioned plant component, as required by plant procedures. The mispositioned plant component incident occurred on July 10, 2019, when I&C technicians mistakenly began maintenance on a pressure switch associated with the Unit 3C charging pump instead of the 4C charging pump. The details of the second and third AV and the OI investigation are documented in NRC Inspection Report 05000250/2021011 and 05000251/2021011, issued on February 4, 2021 (ADAMS Accession No. ML21036A158). The two AVs involved: (1) the failure to comply with plant procedure OP-AA-100-1002, "Plant Status Control Management," as required by 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," when the I&C Supervisor and Department Head failed to notify the main control room of a mispositioned plant component; and (2) the failure of two I&C technicians to maintain a complete and accurate record of maintenance performed on the 4C charging pump, contrary to the requirements of 10 CFR 50.9(a), "Completeness and Accuracy of Information."

In response to the second and third AVs, FPL provided a written response by letter dated March 5, 2021. FPL agreed that both violations occurred as documented in the inspection report and agreed with the willful aspects. FPL provided additional details regarding the seriousness of the incident, its assessment of the significance, root causes, circumstances regarding identification of the violation and corrective actions. FPL's letter also suggested that the NRC exercise its discretion to reduce the severity level and civil penalty, if any, to acknowledge FPL's initial identification of the issues and its corrective actions stemming from the previous event of January 23, 2019. FPL noted that these corrective actions helped to identify the events associated with the second OI report and pointed out the very low safety significance of those events and FPL's prompt and comprehensive additional corrective actions.

Based on the information developed during the investigations, the information that FPL provided during the PEC, and the information provided by FPL in its written response of March 5, 2021, the NRC has determined that three violations of NRC requirements occurred. The violations are cited in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) and the circumstances surrounding these violations are described in detail in the above referenced inspection reports.

The first violation documented in the Notice occurred on January 23, 2019, when mechanics assigned to work on auxiliary feedwater check valve AFWU-3-017 recorded inaccurate information in work order 40542353. The NRC concluded that the actions of FPL staff were deliberate and caused FPL to be in violation of 10 CFR 50.9(a), "Completeness and Accuracy of Information."

The second and third violations documented in the Notice occurred on July 10, 2019, after I&C technicians mistakenly began maintenance on the wrong charging pump. Upon being notified by the I&C technicians, the I&C Supervisor and the I&C Department Head deliberately failed to immediately notify the Operations Shift Manager that I&C technicians assigned to work on the 4C charging pump inadvertently manipulated a pressure switch on the 3C charging pump. These actions were in violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and FPL plant procedure OP-AA-100-1002, "Plant Status Control Management." The third violation involved two FPL I&C employees who deliberately maintained information recorded in the PS-4-201C Work Order Task Description (WOTD) and

Breaker/Switch/Valve Manipulation Form (Form 747) associated with Work Order (WO) Package 40632818-01 that was not complete and accurate in all material respects, as required by 10 CFR 50.9(a), "Completeness and Accuracy of Information." Specifically, information recorded on both documents was inaccurate because it reflected work performed on the Unit 4C charging pump pressure switch (PS-4-201C), when in fact no work was performed on PS-4-201C.

The violations did not cause any actual consequences to the plant. Regarding the violation occurring on January 23, 2019, FPL confirmed that the safety related auxiliary feedwater check valve was not degraded, had not negatively impacted plant operation, and FPL promptly completed the WO after the incident without any impact to the plant. Regarding the two violations occurring on July 10, 2019, FPL's Unit 3 licensed main control room operators responded promptly and in accordance with plant procedures to the charging pump trip by placing another charging pump in service. The two violations did not result in a plant transient and caused only minimal impact to plant operation.

However, the potential consequences of the three violations, when viewed individually and together, are significant and concerning to the NRC. All three violations involved deliberate misconduct on the part of multiple individuals. One violation (Violation No. 2 of the Notice) was directly attributable to individuals in a supervisory and/or management role. As discussed in the NRC Enforcement Policy, willful violations are of particular concern because the NRC's regulatory program is based on licensees and their contractors, employees, and agents acting with integrity and communicating with candor. In light of the above and because the violations are interrelated to a common cause involving integrity issues among multiple FPL staff and inadequate management oversight, these violations have been categorized as a Severity Level III problem in accordance with the NRC Enforcement Policy.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$150,000 is considered for a Severity Level III violation or problem. Because the violations were willful, the NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy.

At the PEC of March 3, 2021, FPL highlighted that the violation of January 23, 2019, associated with inaccurate information in work order 40542353 would have remained undetected but for FPL's efforts to thoroughly investigate the issue to ensure that all work steps were completed in all respects. FPL also noted that its investigation expanded well beyond the original concern brought forth by NRC, resulting in FPL's identification of the falsified maintenance record. In reviewing the information presented by FPL at the PEC, and related investigation and inspection information, the NRC agrees with FPL that credit should be granted for the civil penalty assessment factor of *Identification*. Regarding the two violations associated with the second OI report, identification credit is warranted to reflect FPL's efforts to identify both violations occurring on July 10, 2019, within hours of the occurrence of the incident. Based on the above, the NRC concluded that credit is warranted for the civil penalty assessment factor of *Identification* for the Severity Level III problem documented in the Notice.

Regarding the civil penalty assessment factor of *Corrective Action*, at the PEC of March 3, 2021, FPL identified a number of site-specific corrective actions taken in response to Violation No. 1 of the Notice, including but not limited to: (1) FPL performed an immediate investigation into the incident; (2) FPL reviewed safety-related work completed by the Turkey Point Maintenance department for the three months prior to the January 2019 incident, and reviewed

safety-related work completed by the three mechanics involved; (3) Turkey Point managers held department meetings with all employees in 2019, including contractors, to address the importance of integrity and trust; (4) FPL completed training with all Turkey Point employees covering 10 CFR 50.5 and 10 CFR 50.9 and the consequences of violating those requirements in 2019; (5) Turkey Point leadership completed a case study on the incident of January 23, 2019; and (6) FPL denied site access and issued disciplinary actions for the individuals involved. The NRC concluded that these actions reflect an appropriate, graduated approach to address causes known by FPL to exist at that time, and were commensurate with the significance of the January 23, 2019, incident. As such, credit is warranted for the civil penalty assessment factor of *Corrective Action* for this violation.

In response to the incident of July 10, 2019, and as documented in its written response of March 5, 2021, FPL conducted several layers of inquiry upon becoming aware of the incident, including but not limited to: (1) denying the individuals' unescorted site access, terminating their employment, and immediately having the former Site Vice President share the incident in small sessions with station personnel; (2) performing a Common Cause Evaluation (CCE) of the incident, including an assessment of the extent of condition by reviewing randomly selected work activities for Turkey Point's Security, Radiation Protection, Operations, and Chemistry departments; (3) updating fleet procedure AD-AA-103, "Nuclear Safety Culture Program," to include the Security and Emergency Preparedness Departments which is in addition to the already performed semi-annual verifications of randomly selected work activities across the NextEra fleet for the Maintenance, Operations, Radiation Protection and Chemistry Departments; (4) revising the Turkey Point Department Plan of the Day agendas to include integrity discussions; (5) developing and implementing leadership training for all supervisors, managers, General Maintenance Leaders and Nuclear Watch Engineers on identification of potential integrity events and the actions to take in response to potential integrity events; (6) issuing a fleet-wide communication from the Chief Nuclear Officer (CNO) regarding expectations for accurately performing and documenting work activities, focusing on the message, "Your Signature Is Your Word," followed by a series of communications from the CNO focused on Nuclear Safety Culture (NSC) topics, including the importance of integrity and the meaning of signatures on signed documents; (7) implementing an annual training requirement for all nuclear fleet employees regarding the "Value of Your Signature," which includes the importance of providing complete and accurate information to the NRC (10 CFR 50.9), deliberate misconduct (10 CFR 50.5), the potential consequences for violations of 10 CFR 50.5 and 10 CFR 50.9, the need to report errors to the control room and/or management, what it means to sign a quality record, and understanding electronic signatures; (8) revising the nuclear fleet's corrective action program condition report screening procedure, PI-AA-104-1000, to require causal analysis for substantiated NSC events; and (9) revising the NSC program procedure, AD-AA-103, to require the NSC Monitoring Panel to review of internal evaluations of substantiated integrity events and all NRC violations related to NSC. Based on the above, the NRC concluded that credit is warranted for the civil penalty assessment factor of *Corrective Action* for Violations No. 2 and 3 of the Notice, and for the Severity Level III problem.

The NRC normally would not propose a civil penalty for this Severity Level III problem, because credit is warranted for the civil penalty assessment factors of *Identification* and *Corrective Action*. However, the circumstances of the three violations are very concerning to the NRC for several reasons. In this case, a total of seven FPL employees engaged in deliberate misconduct involving two separate incidents, within approximately a six-month time period, which is indicative of a much wider NSC concern. As also mentioned above, willful violations are of particular concern because the NRC's regulatory program is based on licensees and their contractors, employees, and agents acting with integrity and communicating with candor. The

NRC also notes that FPL's supervisory oversight was not sufficient to instill an appropriate NSC at that time, and in fact supervisors also engaged in deliberate misconduct in the second and third violations. Finally, the NRC considers the deliberate behavior of an I&C supervisor and an I&C Department Head, who initially attempted to hide the incident and influenced others within the I&C department to participate in the concealment of the maintenance error of July 10, 2019, to be particularly concerning.

Consistent with Enforcement Policy Section 3.6, Use of Discretion in Determining the Amount of a Civil Penalty, the NRC has the flexibility to exercise enforcement discretion to propose a base civil penalty where application of the civil penalty assessment factors would otherwise result in zero penalty. In this case, the circumstances of the three violations reflect particularly poor licensee performance in multiple areas, including but not limited to the lack of integrity of multiple FPL employees, the absence of effective management oversight and appropriate work controls within the Maintenance department, the deliberate concealment of the violation by two FPL supervisors/managers, and a less than adequate NSC at that time. Additionally, one of the violations that occurred on July 19, 2019 (i.e., the 10 CFR 50.9 violation), is a repeat of the same type of violation that occurred on January 23, 2019, when multiple FPL employees also deliberately falsified plant records, and all three violations are related to a common root cause. As such, the NRC has concluded that the exercise of enforcement discretion is warranted to propose a base civil penalty in the amount of \$150,000.

Therefore, I have been authorized, after consultation with the Director, Office of Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) in the base amount of \$150,000 for the SL III problem.

If you disagree with this enforcement sanction, you may deny the violation, as described in the Notice, or you may request alternative dispute resolution (ADR) with the NRC in an attempt to resolve this issue. ADR is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation. Mediation is a voluntary, informal process in which a trained neutral (the "mediator") works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues. Additional information concerning the NRC's ADR program can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>.

The Institute on Conflict Resolution (ICR) at Cornell University has agreed to facilitate the NRC's program as a neutral third party. If you are interested in pursuing this issue through the ADR program, please contact: (1) the ICR at (877) 733-9415; and (2) Mr. David Dumbacher at (404) 997-4628 within 10 days of the date of this letter. You may also contact both ICR and Mr. Dumbacher for additional information. Your submitted signed agreement to mediate using the NRC ADR program will stay the 30-day time period for payment of the civil penalty and the required written response, as identified in the enclosed notice, until the ADR process is completed.

The NRC has concluded that information regarding (1) the reason for the violations; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance was achieved was adequately addressed at the

pre-decisional enforcement conference and in FPL's letter of March 5, 2021. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

For administrative purposes, this letter is issued as NRC IR 05000250/2021090 and 05000251/2021090. AV 05000250/2020011-01 has been re-designated as Notice of Violation (NOV) 05000250/2020011-01. AV 05000250,05000251/2021011-01 has been re-designated as NOV 05000250,05000251/2021011-01. AV 05000250,05000251/2021011-02 has been re-designated as NOV 05000250,05000251/2021011-02.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agencywide Documents Access and Management System (ADAMS), 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. The NRC also includes significant enforcement actions on its Web site at http://www.nrc.gov/reading_rm/doc_collections/enforcement/actions/.

If you have any questions concerning this matter, please contact Mr. David Dumbacher of my staff at (404) 997-4628.

Sincerely,

/RA/

Laura A. Dudes
Regional Administrator

Docket Nos.: 05000250, 05000251
License Nos.: DPR-31, DPR-41

Enclosures:

1. Notice of Violation and Proposed Imposition of Civil Penalty
2. NUREG/BR-0254 Payment Methods

cc: Distribution via ListServ

SUBJECT: TURKEY POINT NUCLEAR GENERATING STATION - NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY – \$150,000, NRC INSPECTION REPORT NOS. 05000250/2021090 AND 05000251/2021090; INVESTIGATION REPORT NOS. 2-2019-011 AND 2-2019-025; EXERCISE OF ENFORCEMENT DISCRETION Dated April 6, 2021

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DATE	3/31/2021	3/29/2021	4/6/2021			

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NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Florida Power and Light Company
Turkey Point Nuclear Generating Station
Units 3 and 4

Docket Nos.: 50-250, 50-251
License Nos.: DPR-31, DRP-41
EA-20-043, EA-20-150

During an NRC investigation completed on March 10, 2020, and an NRC investigation completed on November 10, 2020, violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the NRC proposes to impose a civil penalty of \$150,000 pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The particular violations and associated civil penalty are set forth below:

1. 10 CFR 50.9(a), "Complete and Accuracy of Information" states, in part, that information required by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects.

Contrary to the above, on January 23, 2019, the licensee maintained information recorded in steps 4.6 and 4.11 of Work Order (WO) 40542353 that was not complete and accurate in all material respects. Specifically, step 4.6 of the WO was marked complete, yet the work was not performed using the Check Valve Data Sheet (CVDS). Additionally, for step 4.11, inaccurate information was recorded regarding the tools used in the Journeyman Work Report and inaccurate measurement values were recorded in the CVDS. Documents associated with WO 40542353 are records that the licensee is required to maintain pursuant to 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records." Records of inspections of safety-related equipment are material to the NRC because they indicate whether the licensee is performing quality-related and safety-related activities in accordance with its operating procedures and NRC regulations.

2. 10 CFR Part 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings" states that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Procedure OP-AA-100-1002, "Plant Status Control Management" (an FPL implemented safety-related procedure), Step 3.6.7, states, in part, that site personnel are to immediately notify the Operations Shift Manager of any inadvertent bumping or mispositioning of plant components.

Contrary to the above, on July 10, 2019, the reporting of a mispositioned plant component, an activity affecting quality, was not accomplished in accordance with procedure OP-AA-100-1002. Specifically, site personnel failed to immediately notify the Operations Shift Manager that Instrumentation and Controls (I&C) technicians assigned to work on the 4C charging pump inadvertently manipulated a pressure switch on the Unit 3C charging pump. The I&C technicians, I&C Supervisor and I&C Department Head had several opportunities to report the human performance error to the control room and failed to do so.

3. 10 CFR 50.9(a), "Complete and Accuracy of Information" states, in part, that information required by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects.

Contrary to the above, on July 10, 2019, the licensee maintained information recorded in the in the Pressure Switch (PS) PS-4-201C Work Order Task Description (WOTD) and Breaker/Switch/Valve Manipulation Form (Form 747) associated with WO Package 40632818-01 that was not complete and accurate in all material respects. Specifically, information recorded on both documents was inaccurate because it reflected work performed on the Unit 4C charging pump pressure switch (PS-4-201C), when in fact no work was performed on PS-4-201C. Additionally, the WO contained no documentation or notes explaining that the steps were completed on the wrong component. Documents associated with WO Package 40632818-01 for the safety-related Unit 4C charging pump are records that the licensee is required to maintain pursuant to 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records." Records of maintenance of safety-related equipment are material to the NRC because they indicate whether the licensee is performing quality-related and safety-related activities in accordance with its operating procedures and NRC regulations.

This is a Severity Level III problem (Enforcement Policy Sections 2.2.1.d, 6.1, 6.9).
Civil Penalty - \$150,000.

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence and the date when full compliance was achieved was adequately addressed at the March 3, 2021, predecisional enforcement conference and in FPL's written response dated March 5, 2021. However, if the description therein does not accurately reflect your position or your corrective actions, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 within 30 days of the date of the letter transmitting this Notice of Violation. In that case, or if you choose to respond, clearly mark your response as a 'Reply to a Notice of Violation – EA-20-043, EA-20-150', and send it to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S., Nuclear Regulatory Commission, Region II, 245 Peachtree Center Avenue, N. E., Suite 1200, Atlanta, GA, 30303, and the NRC Resident Inspector at the facility that is the subject of this Notice, and the Document Control Desk, Washington, DC 20555-0001.

FPL may pay the civil penalty proposed above in accordance with NUREG/BR-0254 and by submitting to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, a statement indicating when and by what method payment was made, or may protest imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice. Should FPL fail to answer within 30 days of the date of this Notice, the NRC will issue an order imposing the civil penalty. Should FPL elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violations listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the response should address the factors discussed in Section 2.3.4 of the Enforcement Policy. Any written answer addressing these

factors pursuant to 10 CFR 2.205 should be set forth separately from the statement or explanation provided pursuant to 10 CFR 2.201, but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of FPL is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing a civil penalty.

Upon failure to pay any civil penalty which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205 to be due, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses noted above, i.e., Reply to Notice of Violation, Statement as to Payment of Civil Penalty, and Answer to a Notice of Violation, should be addressed to: Anton Vogel, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region II, 245 Peachtree Center Avenue, N. E., Suite 1200, Atlanta, GA, 30303, and the NRC Resident Inspector at the facility that is subject to this Notice, and the Document Control Center, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), 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 or proprietary 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 is 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.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 6th day of April 2021.