



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

May 1, 2024

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

SUBJECT: TURKEY POINT UNITS 3 AND 4 – DESIGN BASIS ASSURANCE INSPECTION
(PROGRAMS) INSPECTION REPORT 05000250/2024010 AND
05000251/2024010 AND NOTICE OF VIOLATION

Dear Bob Coffey:

On March 29, 2024, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Turkey Point Units 3 & 4 and discussed the results of this inspection with Michael Strobe and other members of your staff. The results of this inspection are documented in the enclosed report.

The enclosed report discusses a violation associated with a finding of very low safety significance (Green). The NRC evaluated this violation in accordance Section 2.3.2 of the NRC Enforcement Policy, which can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. We determined that this violation did not meet the criteria to be treated as a non-cited violation because the site failed to restore compliance within a reasonable period of time after a 2013 corrective action violation was identified consistent with Section 2.3.2 of the Enforcement Policy. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice (Enclosure 1) when preparing your response. The specific timeline and conditions necessary to restore compliance in Units 3 & 4. The NRC's review of your response will also determine whether further enforcement action is necessary to ensure your compliance with regulatory requirements.

Additionally, four findings of very low safety significance (Green) are documented in this report. Four of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement; and the NRC Resident Inspector at Turkey Point Units 3 & 4.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; and the NRC Resident Inspector at Turkey Point Units 3 & 4.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by Baptist, James
on 05/01/24

James B. Baptist, Chief
Engineering Branch 1
Division of Reactor Safety

Docket Nos. 05000250 and 05000251
License Nos. DPR-31 and DPR-41

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: TURKEY POINT UNITS 3 & 4 – DESIGN BASIS ASSURANCE INSPECTION (PROGRAMS) INSPECTION REPORT 05000250/2024010 AND 05000251/2024010 AND NOTICE OF VIOLATION DATED: MAY 1, 2024

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NAME	T. Fanelli	M. Hagen	J. Lizardi-Barreto	J. Baptist	
DATE	5/1/2024	4/30/2024	5/1/2024	5/1/2024	

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NOTICE OF VIOLATION

Florida Power & Light Company

Docket Nos.: 05000250 and 05000251

Turkey Point

License Nos.: DPR-31 and DPR-41
NOV 05000250,05000251/2024010-05

Consistent with the NRC Enforcement Policy and Title 10 of the Code of Federal Regulations (CFR) Part 2.201, the following violation identified in inspection report 2024010 is being cited:

Title 10 of CFR 50 Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure conditions adverse to quality are promptly identified and corrected.

Contrary to the above, since 2005, the licensee identified a condition adverse to quality associated with the lack of MCCB testing, but failed to implement measures to assure that the testing deficiencies were corrected in a prompt manner. Specifically, the site failed to restore compliance within a reasonable period of time after a 2013 corrective action violation to ensure that molded case circuit breakers were adequately tested.

This violation is associated with a Green finding.

Replying to Notice of Violation

You are required to submit a written explanation or statement under 10 CFR 2.201 to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region 2, and a copy to the NRC Resident Inspector at Turkey Point, within 30 days of the date of the issuance of this Notice of Violation. Please mark your reply "Reply to a Notice of Violation; NOV 05000250,05000251/2024010-05" and include the following for each violation:

- (1) The reason for the violation, or, if contested, the basis for disputing the violation
- (2) The corrective steps that have been taken and the results achieved
- (3) The corrective steps that will be taken
- (4) The date when full compliance will be achieved

Your written explanation or statement may reference or include previous docketed correspondence. If an adequate reply is not received within 30 days, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why other appropriate action should not be taken. Where good cause is shown, consideration will be given to extending the required 30 day response time.

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

Dated this 1st day of May 2024

**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000250 and 05000251

License Numbers: DPR-31 and DPR-41

Report Numbers: 05000250/2024010 and 05000251/2024010

Enterprise Identifier: I-2024-010-0044

Licensee: Florida Power & Light Company

Facility: Turkey Point Units 3 & 4

Location: Homestead, FL

Inspection Dates: March 04, 2024 to April 05, 2024

Inspectors: T. Fanelli, Senior Reactor Inspector
M. Hagen, Reactor Inspector
J. Lizardi-Barreto, Reactor Inspector

Approved By: James B. Baptist, Chief
Engineering Branch 1
Division of Reactor Safety

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee’s performance by conducting a design basis assurance inspection (programs) inspection at Turkey Point Units 3 & 4, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC’s program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

Failure to Perform Insulation and Load Testing			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-01 Open/Closed	[H.14] - Conservative Bias	71111.21N.04
The inspectors identified a Green non-cited violation (NCV) of Title 10 CFR 50, Appendix B, Criterion XVI, “Corrective Action,” for inadequate corrective actions associated with cable insulation testing and load testing for cables over 600V.			

Failure to Qualify Thermite Welding Process, Procedures, and Personnel			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-02 Open/Closed	[H.3] - Change Management	71111.21N.04
The inspectors identified a Green NCV of Title 10 CFR Part 50, Appendix B, Criterion IX, “Control of Special Processes,” for the licensee’s failure to qualify thermite welding process used, during installation activities, for the new Impressed Current Cathodic Protection System (ICCP) wire terminations to safety-related reinforcing steel bars from the Class I Intake Structure.			

Failure to Assess Degradation of Intake Structure Below Waterline			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-03 Open/Closed	[H.10] - Bases for Decisions	71111.21N.04
The NRC identified a Green NCV of Title 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the licensee’s failure to assure the integrity of the cooling water Intake Structure below the water line in accordance with the site licensing requirements and 0-ADM-561, “Structures Monitoring Program,” Revision 15.			

Failure to Qualify Quality Control and Craft Personnel			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-04 Open/Closed	[H.2] - Field Presence	71111.21N.04

The NRC identified three examples of a Green finding and associated NCV of Title 10 CFR 50 Appendix B Criterion X, "Inspection," for the licensee's failure to qualify personnel to the pertinent Quality Assurance Program (QAP) for safety-related work.

Failure to Implement Timely Corrective Actions to Test Molded Case Circuit Breakers

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NOV 05000250,05000251/2024010-05 Open	[H.5] - Work Management	71111.21N.04

The NRC identified a Green notice of violation (NOV) of Title 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to restore compliance within a reasonable period of time after a 2013 corrective action violation to ensure that molded case circuit breakers were adequately tested.

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	05000250,05000251/2024010-06	Circuit Breaker Quality as a Basic Component	71111.21N.04	Open

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.21N.04 - Age-Related Degradation

Age-Related Degradation (9 Samples)

- (1) Concrete cracks and repair (RAB, FHB, TB Concrete Repairs and Intake)
- (2) EDG fuel oil flexible hoses
- (3) Class 1E electrical room AC units
- (4) EDG FM and VM Relays
- (5) 3D23, Vital DC Switchboard
- (6) AFW piping
- (7) Underground Cables and Conduits
- (8) Site lightening protection/ground mat
- (9) Cathodic Protection systems

INSPECTION RESULTS

Failure to Perform Insulation and Load Testing			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-01 Open/Closed	[H.14] - Conservative Bias	71111.21N.0 4
The inspectors identified a Green non-cited violation (NCV) of Title 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for inadequate corrective actions associated with cable circuit insulation testing and circuit load testing for cables over 600V.			
<p><u>Description:</u> The licensing basis defined in the technical specifications (TS), the UFSAR Chapter 8, or standard IEEE 308-1971 require performance surveillance testing of power cables rated above 600V. In addition, the licensing basis for electrical power system design is described in IEEE 308-1971, "Class IE Electric Systems for Nuclear Power Generating Stations." Section 6, "Surveillance Requirements," of this standard specified the periodic testing requirements for the power system cables rated over 600V.</p> <p>Example one, during a 2020 design basis assurance inspection the NRC issued NCV (05000251,05000250/2020010-02), "Failure to Load Test Offsite Power Source." The site had a specific licensing basis to periodically load test cross connect cable circuits between each unit's start up transformer and the opposite units 4160V safety bus. This was specified by (TS) 3/4.8.1, "A.C. SOURCES," and the UFSAR Chapter 8.2.2.1.2.1, "General Design</p>			

Criteria (GDC) as defined in 10 CFR 50 Appendix A.” The inspectors noted that the corrective actions taken for this violation did not meet the licensing basis requirements to assess the capacity and capability of the cable circuits. The expected load on the cables is 485 amperes; however, the site used 88 amperes to test the cable circuits for one of the Unit’s. This test did not challenge the expected capacity and capability of the circuits or provide information to assess aging degradation for these cable parameters.

Example two, the inspectors noted that the site did not meet the licensing basis power system surveillance requirements for any of the cables in circuits rated above 600V. Power system surveillance requirements include periodic insulation testing and periodic operational (load) testing of the cables in circuits rated above 600V. The site has not performed these required tests for the life of the plant, thus age-related degradation has not been assessed for the system. Age-related degradation effects the capacity and capability of these cabling systems.

Corrective Actions: The licensee intends to develop testing methods to verify the condition, capability, and predicted life of the site cabling systems.

Corrective Action References: ARs 2481030 and 2481032

Performance Assessment:

Performance Deficiency: The failure to meet the sites cable performance testing requirements was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to ensure the licensing basis requirement to periodically assess the condition of power system cables throughout the life of the plant effects the reliability of the capacity and capability of the safety systems that rely on them to complete their safety functions.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” Exhibit 2 – Mitigating Systems Screening Questions, Item A. The finding was a deficiency affecting the design or qualification of a mitigating SSC, and it maintains its operability or PRA functionality Screen to Green.

Cross-Cutting Aspect: H.14 - Conservative Bias: Individuals use decision making-practices that emphasize prudent choices over those that are simply allowable. A proposed action is determined to be safe in order to proceed, rather than unsafe in order to stop. Specifically, the site decision making-practices did not emphasize the prudent choice to justify the continued quality and reliability of safety-related power components for future use over allowing age-related failures to indicate the need for maintenance.

Enforcement:

Violation: Title 10 CFR 50, Appendix B, Criterion XVI, “Corrective Action,” states in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material, and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, since 2020, the site failed to assure that the conditions adverse to quality were promptly identified and corrected associated with electrical cable circuit insulation and load testing requirements were met to assure the reliability and capability of the circuits.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Failure to Qualify Thermite Welding Process, Procedures, and Personnel

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-02 Open/Closed	[H.3] - Change Management	71111.21N.04

The inspectors identified a Green NCV of Title 10 CFR Part 50, Appendix B, Criterion IX, "Control of Special Processes," for the licensee's failure to qualify thermite welding process used, during installation activities, for the new Impressed Current Cathodic Protection System (ICCP) wire terminations to safety-related reinforcing steel bars from the Class I Intake Structure.

Description: Turkey Point Unit 3 and 4 updated final safety analysis report (UFSAR), Appendix 5A, Section 5A-1.3.1.2, "Hypothetical Accident, Wind and Earthquake Conditions," states in part that "concrete structures are designed for ductile behavior whenever possible; that is, with steel stress controlling the design." The UFSAR requires compliance with American Concrete Institute (ACI) standards 349, "Code Requirements for Nuclear Safety Related Concrete Structures," 318, "Building Code Requirements for Structural Concrete and Commentary," and the American Welding Society (AWS) standards D1.1, "Structural Welding Code-Steel," and D1.4, "Structural Welding Code-Steel Reinforcing Bars."

The inspectors reviewed engineering change (EC) documents and attachments for modifications to the Class 1 cooling water intake structure from EC 296652, "Intake and ICCP Replacement and Structural Repairs," Revision (Rev.) 2. The inspectors noted that the EC specified the use of exothermic (thermite) welding to attach the ICCP wiring to the safety-related reinforcing steel bars (American Society for Testing and Materials (ASTM) A615 Grade 60 rebar). The inspectors requested procedures, specifications, and qualification documents associated with the EC to verify that the thermite welding process was qualified for the intended application under an approved Appendix B Quality Assurance Program and the UFSAR.

The inspectors identified several issues with the welding process associated with 10 CFR 50 Appendix B criterion IX, "Control of Special Processes" and the UFSAR Appendix 5A, Section 5A-1.3.1.2:

1. The thermite welding process was not a qualified process,
2. the contractor who performed the thermite welding was not qualified,
3. the welding activities were not performed with a qualified procedure, and
4. the welds were not inspected by a qualified quality control (QC) inspector.

The inspectors were concerned about the thermite welding process because ACI 318 and AWS D15.2 explains that it can cause an embrittlement of steel (i.e. martensite steel) due to the rapid cooling effect. However, the EC stated, in part, that "the welding process will have a negligible effect on the strength of the rebar." The inspectors determined that the EC failed to consider the use of heat-affected rebar on the safety function of the intake structure which

supports the piping, pumps, motors, etc.

Specifically, ACI 318 section 21.2.6.2, specified that unless competent controls are used, “welding of stirrups, ties, inserts, or other similar elements to longitudinal reinforcement required by design shall not be permitted.” The section further explains that welding can lead to localized embrittlement of the steel.

Standard AWS D1.4 states, that the weldability of the steel is based on its carbon equivalent (CE), calculated from the chemical composition of the steel. Thermite welding is not a method accepted in section 1.4.1, however section 1.4.2 allows other welding processes when “approved by the Engineer, provided that any special qualification test requirements not addressed by the code are met to ensure that welds satisfactory for the intended application will be obtained.” Sections 6.0 thru 6.3, state the responsibilities and requirements for procedure and personnel qualifications.

Based on the above, the inspectors determined that thermite welding is a special process that must be qualified in accordance with 10 CFR 50, Appendix B, Criterion IX. This includes the qualification of the process, procedures, and personnel per AWS D1.4, and per other applicable standards, including ACI 349 and ACI 318, for the ASTM A615 G60 rebar. The inspectors noted that the embrittlement of the rebar would have been a design control attribute of the qualification requirements from Criterion IX. This was needed to verify the adequacy of design for effects of welding to the reinforcement of the intake structure.

Corrective Actions: The licensee entered the issue into their corrective action program to correct the project quality assurance processes.

Corrective Action References: AR 2482654

Performance Assessment:

Performance Deficiency: The failure to qualify the thermite welding process, procedures, and personnel in accordance with the UFSAR was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to qualify special processes adversely affected the integrity and therefore the reliability of ASTM A615 G60 rebar and cooling water intake structure.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” Exhibit 2 – Mitigating Systems Screening Questions, Item A. The finding was a deficiency affecting the design or qualification of a mitigating SSC, and it maintains its operability or PRA functionality Screen to Green.

Cross-Cutting Aspect: H.3 - Change Management: Leaders use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority. Specifically, leaders at the site did not use a systematic process for evaluating and implementing a change that used new welding processes and its effects on metallurgical

properties of certain types of rebar for safety related structures so that nuclear safety remains the overriding priority.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion IX, “Control of Special Processes,” states that “measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.”

Contrary to the above, since the issuance of EC 296652 on March 31, 2023, the licensee failed to assure that special processes, including thermite welding of ICCP wire leads to ATSM A615 G60 rebar, were controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Failure to Assess Degradation of Intake Structure Below Waterline

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-03 Open/Closed	[H.10] - Bases for Decisions	71111.21N.04

The NRC identified a Green NCV of Title 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the licensee’s failure to assure the integrity of the cooling water intake structure below the water line in accordance with the site licensing requirements and 0-ADM-561, “Structures Monitoring Program,” Rev. 15.

Description: The updated final safety analysis report (UFSAR), Section 16.2.15, “Existing Programs – Systems and Structures Monitoring,” specified that the administration (ADM) procedures 0-ADM-561, “Systems and Structures Monitoring Program,” and 0-ADM-564, “Systems/Programs Monitoring,” would implement the criteria identified in the License Renewal Aging Management (LRAM) Basis Document, PTN-ENG-LRAM-00-0042, “Systems and Structures Monitoring Program – License Renewal Basis Document,” Rev. 13. Per the above, exposed concrete surfaces were to be assessed for the loss of material or change in material properties per the acceptance criteria identified in Attachment 11.2 of the LRAM basis, “Structures/Supports Requiring Inspection for License Renewal.”

After LRAM inspections, the licensee issued “condition assessment phase A reports” documented in the corrective action program for each unit (3 & 4) in action requests (ARs) 2359905 and 2415332 respectively. The reports identified that the concrete below the water line was degraded because it had less surface hardness, porosity, and calcium carbonate mineral deposits. The degraded condition met the threshold in the ADM procedures for further inspection because the degradation had the appearance of leaching or chemical attack and drummy areas (i.e. which may exceed the cover concrete thickness in depth), which would require further evaluation and possibly repair. However, the conclusion of the reports stated, in part, the “effect or porosity was not evaluated considering the large existing structural design margins in the structural elements and a lack of evidence which suggested a

substantial increase of porosity in the elements.” This statement was made without a determination that the LRAM commitments could be achieved or confirmed without further examination for the affected structures. The inspectors determined that not assuring the LRAM commitments, below the intake structure waterline, was detrimental to its structural or functional integrity and adversely affected the intake structure safety function.

Corrective Actions: The licensee entered the issue into their corrective action to restore compliance.

Corrective Action References: AR 2482110

Performance Assessment:

Performance Deficiency: The failure to assure the integrity of the cooling water intake structure below the water line in accordance with the site licensing requirements and 0-ADM-561 was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Human Performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to perform further technical evaluation to verify the integrity of the intake structure below the waterline impacts the reliability and capability of the intake to perform its function under all required conditions and could lead to the loss of cooling water to support systems for safety-related systems.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” Exhibit 2 – Mitigating Systems Screening Questions, Item A. The finding was a deficiency affecting the design or qualification of a mitigating SSC, and it maintains its operability or PRA functionality Screen to Green.

Cross-Cutting Aspect: H.10 - Bases for Decisions: Leaders ensure that the bases for operational and organizational decisions are communicated in a timely manner. Specifically, leaders did not use a clearly documented basis to not evaluate degradation on the intake structure identified below the waterline for further porosity and communicate a justifiable decision in a timely manner.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” states, in part, activities affecting quality shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on or before March 4, 2024, the licensee failed to accomplish the intake evaluations in accordance with procedure 0-ADM-561 and, thus, evaluate conditions adverse to quality with the appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished in accordance with license renewal commitments for the area below the waterline of the intake concrete structure.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Failure to Qualify Quality Control and Craft Personnel			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000250,05000251/2024010-04 Open/Closed	[H.2] - Field Presence	71111.21N.04
<p>The NRC identified three examples of a Green finding and associated NCV of Title 10 CFR 50 Appendix B Criterion X, "Inspection," for the licensee's failure to qualify personnel to the pertinent Quality Assurance Program (QAP) for safety-related work.</p> <p><u>Description:</u> The inspectors reviewed construction documents and observed repair activities of structural concrete for the Turkey Point Unit 3 and 4 Class I intake structure to determine if the elements of the QAP were met. This included the reviewed of project specifications, procedures and qualification records associated with the implementation of engineering change (EC) 296652, "Intake and ICCP Replacement and Structural Repairs," Rev. 2. The implementation activities involved craft personnel performing the demolition and replacement of unsound concrete from intake structural members and quality control (QC) inspections, performed by the project personnel, for concrete and reinforcing steel bars (rebar). The inspectors identified three examples of licensee failures to qualify personnel in the QAP and implement adequate inspection control measures during repair activities on safety-related structural concrete:</p> <p>1. Turkey Point Unit 3 and 4 UFSAR, Table 17.4-1, "License Renewal Commitments," clarifies and requires under commitment item 39 (e) that "inspector qualification will be per ACI 349.3R" requirements for the existing structure monitoring and enhancement of the intake structure. Chapter 7 of ACI 349.3R-02 requires, in part, that the "personnel performing the inspections or testing at the plant, under the direction of the responsible engineer," should be a "Civil or structural engineering graduate with at least one year of experience (or are ACI inspector certified) in the evaluation of in-service concrete structures or quality assurance related to concrete structures; or personnel possessing at least five years of experience (or are ACI inspector certified) in the inspection and testing of concrete structures and having qualifications acceptable to the responsible engineer."</p> <p>The inspectors reviewed the qualified supplier's scope for approval of services in the Qualified Supplier List (QSL), for supplier International Quality Consultants (IQC), and the qualification records for the associated QC inspectors. The inspectors noted that the QSL did not specifically approve IQC for quality assurance of structural reinforced concrete, but only to "Services performed per the customer's quality assurance program." The qualification records did not demonstrate that these QC inspectors had sufficient experience and training for the inspection of structural concrete repairs, in accordance with the UFSAR, as stated above. The records documented that the QC inspectors were qualified for "anchor bolt, grout, penetration seal & concrete inspections," (Level II Civil Inspectors with limited qualification).</p> <p>The qualification record for one of the Level II Civil Inspectors was signed and approved by another Level II Civil Inspector, in lieu of the required Level III Civil Inspector approval. NQA-1 1994, supplement 2s-1, Basic Requirement 2, Section 2.2 for Personnel Selection states that "Personnel selected for performing inspection and test activities shall have the experience or training commensurate with the scope, complexity, or special nature of the activities." Section 2.3, Indoctrination, states that "Provisions shall be made for the indoctrination of personnel as to the technical objectives and requirements of the applicable codes and standards, and the</p>			

quality assurance program elements that are to be employed.” The QC inspectors’ qualifications did not meet this requirement for the specific inspection scope of structural concrete and rebar repairs.

2. The inspectors noted that examinations and measurements for each work operation were not documented where necessary to assure quality. Specifically, the EC 296652, Section D, “Special Implementation Instructions,” required work hold point 33(c) to implement Note 2.2.5 of sketch EC296652-C-001 Sheet 2. The note specified “When reinforcing bar must be exposed during the course of the repair contractor shall perform the following: (a) Inspect rebar (e.g. localized or general reduction in diameter); (b) Document the found configuration of rebar degradation; (c) Document the depth of concrete cover over the reinforcing steel.” The QC inspectors failed to document their inspections and observations in accordance with hold point 33(c). in the implementing Work Order (WO) 40855521-26. Further, EC 296652 section D required, under work hold point 34, that “for the purposes of structural steel cleaning and coating, refer to the following key hold points: (a) Sketch EC296652-C-001 SHT 3, Note 3.2 requires the field to notify engineering of any material loss to structural steel elements. Engineering will then either accept the material loss or provide a repair solution on a case-by-case basis.” Contrary to the hold point, the QC inspectors did not identify or document in the WO damage to the rebar that occurred during removal of unsound concrete, neither was this documented in the corrective action program (CAP).

3. The inspectors noted that the general contractor, Champion Specialty Services (CSS), performs intake structure repairs, under a licensee approved Appendix B QAP. This included their subcontractors Underwater Engineering Services, Inc. (UESI), CorrPro, and Riley Power Group. According to the FPL’s training matrix, CSS personnel and subcontractors were not fully trained or indoctrinated in the pertinent QAP and that it included the expectation of following controls, procedures, and instructions as well as for the implementation of the CAP for the project. This resulted on the failure to promptly identify and document work processes that significantly damaged rebar during concrete removal and demolition activities.

The inspectors reviewed Specification CN-2.11, “Specification for Concrete Testing, Placing, Curing and Finishing,” Rev. 7, and WO 40855521-26. The specification section 9.1.1(e) stated, in part, “No reinforcing bars shall be cut or damaged during preparation activities,” and section 9.2(a) stated, in part, “when chipping or drilling, care shall be exercised to avoid damage to reinforcing bars.” The WO steps 4.14, 4.24, 4.41, and 4.42 specifically requires “Do not cut through rebar.” Contrary to this, the craft caused several gouges that exceeded acceptance criteria on existing safety-related rebar during concrete demolition activities. The WO steps 4.19 states “After sound concrete has been exposed and all reinforcing bar corrosion or damage has been remedied, then repair the concrete.” However, concrete was poured over damaged rebar before the damage was remedied.

Corrective Actions: The licensee entered the issue into their corrective action program to restore compliance.

Corrective Action References: AR 2481871 and 2482284

Performance Assessment:

Performance Deficiency: The failure to qualify personnel to the pertinent QAP for safety-related work was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Human Performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to qualify personnel in the QAP to identify conditions adverse to quality during modifications to the site intake structure affected the reliability and capability of the cooling water to perform its functions.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." Exhibit 2 – Mitigating Systems Screening Questions, item A. The finding was a deficiency affecting the design or qualification of a mitigating SSC, and it maintains its operability or PRA functionality Screen to Green.

Cross-Cutting Aspect: H.2 - Field Presence: Leaders are commonly seen in the work areas of the plant observing, coaching, and reinforcing standards and expectations. Deviations from standards and expectations are corrected promptly. Senior managers ensure supervisory and management oversight of work activities, including contractors and supplemental personnel. Specifically, leaders were not commonly seen in the contractor work areas of the around the cooling water intake concrete reinforcement work observing, coaching, and reinforcing standards and expectations. Leaders did not ensure contractors were qualified to document deviations from standards and expectations to be corrected promptly. Senior managers did not ensure supervisory and management oversight of the work activities, including contractors and supplemental personnel.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion X, "Inspection", states, "a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. Such inspection shall be performed by individuals other than those who performed the activity being inspected. Examinations, measurements, or tests of material or products processed shall be performed for each work operation where necessary to assure quality. If inspection of processed material or products is impossible or disadvantageous, indirect control by monitoring processing methods, equipment, and personnel shall be provided. Both inspection and process monitoring shall be provided when control is inadequate without both. If mandatory inspection hold points, which require witnessing or inspecting by the applicant's designated representative and beyond which work shall not proceed without the consent of its designated representative are required, the specific hold points shall be indicated in appropriate documents."

Contrary to Criterion X, since 2023, the site failed to ensure that inspections were performed by individuals qualified in 10 CFR 50, Appendix B criteria to ensure the work and inspection activities affecting quality met the quality assurance program requirements.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Failure to Implement Timely Corrective Actions to Test Molded Case Circuit Breakers			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NOV 05000250,05000251/2024010-05 Open	[H.5] - Work Management	71111.21N.04
<p>The NRC identified a green notice of violation (NOV) of Title 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to restore compliance within a reasonable period of time after a 2013 corrective action violation to ensure that molded case circuit breakers (MCCBs) were adequately tested.</p> <p><u>Description:</u> The inspection sampled the direct current (DC) MCCBs in DC panelboard 3D23. The inspectors noted that only twelve of thirty-four MCCBs were replaced or tested in 3D23 since 2013. Of these twelve, nine were replaced in April 2020, and two of the nine failed confirmatory bench testing after being replaced. In 2013, the site received "NCV 05000250, 251/2013002-01, Failure to Implement Timely Corrective Actions to Test Molded Case Circuit Breakers." The age range of the in-service MCCBs in question at Turkey Point is twenty to fifty-four years. Some MCCBs are original plant equipment, some were installed in the 1980's, and the remainder installed in the early 1990's and some later. Except for bench testing prior to installation, no testing or maintenance has been performed on the MCCBs that are in service. Licensing basis standard IEEE 308-1971 specifies that circuit breaker performance must be confirmed on a reasonably periodic basis consistent with their safe operation in the plant. Periodic testing and maintenance on safety-related MCCBs decreases the risk of failure and assures the reliability and capability of the site safety functions. These MCCBs are susceptible to age-related failures such as maloperation, overheating, and grease hardening. Overheating can exceed material temperature ratings, distort motor control center case and operating mechanism tolerances, and result in hardening/baking of grease. Grease hardening can result in the breaker failing to open or a delay in opening during a downstream electrical fault.</p> <p>In 2005 and 2006, during Turkey Point's preventative maintenance optimization project, the licensee identified that a testing program for safety-related 120 VAC and 125 VDC MCCBs had not been established. At that time, the licensee developed a preventative maintenance (PM) program for the MCCBs. However, the licensee suspended the PMs, in part, because of scheduling challenges associated with Technical Specification (TS) restrictions. Specifically, the TS has a two-hour action statement associated with the de-energization of the AC or DC load centers, which was deemed not enough time to perform the PMs.</p> <p>In 2008, in response to the cancelled PMs, the licensee initiated a change authorization request (CAR) 08-069 and assigned the CAR as a Turkey Point Excellence (TPE) project. The TPE project was later cancelled due to funding.</p> <p>In 2010, the licensee initiated AR 1649834 because the funding for the TPE project was terminated. This AR created a new long term asset management initiative to retarget the project in future years.</p> <p>In 2011, engineering change request (ECR) 1657020 was created for a one-time replacement of all safety-related 120 VAC and 125 VDC MCCBs and entered into the licensee's long term management program as PTN-11-0177 (Unit 3) and PTN -11-0179 (Unit 4).</p>			

In 2013, in response to violation NCV 05000250, 251/2013002-01, the licensee committed to changing the TS two-hour action statement that prevented the de-energization of the AC or DC load centers to test or replace the MCCBs. As of the time of this inspection in 2024, the licensee has not met this commitment; therefore, the two-hour action statement remains in place and the MCCBs have not been tested.

In 2015, a some MCCBs were replaced, many of these were in a failed state when as-found testing was done. Since 2015 very few MCCBs were replaced because of conflicts with outage scheduling and Unit 3 & 4 shared system conflicts. (More info TBD)

The inspectors found that since the 2013 Criterion XVI violation was identified; the interim measures to correct the nonconforming condition were unsuccessful. Specifically, on multiple occasions since 2005, the licensee failed to take adequate corrective action to ensure the reliability and capability of the MCCBs to perform their design function while pursuing long term strategies. The license did not modify the license to allow for more TS outage time in order to remove and replace the more difficult MCCBs. Additionally, the inspectors identified that the licensee has not scoped the protective tripping function of the MCCBs in the maintenance rule program because the site intended to replace the MCCBs instead of testing the function.

To date, some MCCBs have been replaced with a significant number of original MCCBs remaining in service. Some replaced MCCBs failed confirmatory bench testing that was to assure past operability.

Corrective Actions: The licensee entered the issue into the corrective action program.

Corrective Action References: AR 2482014

Performance Assessment:

Performance Deficiency: The failure to restore compliance within a reasonable period of time, after a 2013 corrective action violation to ensure that molded case circuit breakers were adequately tested, was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Human Performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to restore compliance to assess if MCCBs can perform their safety function after the effects of aging while they are in safety related service affects the availability, reliability, and capability of the systems that rely on these MCCBs to respond to initiating events.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." Exhibit 2 – Mitigating Systems Screening Questions, Item A. The finding was a deficiency affecting the design or qualification of a mitigating SSC, and it maintains its operability or PRA functionality Screen to Green.

Cross-Cutting Aspect: H.5 - Work Management: The organization implements a process of planning, controlling, and executing work activities such that nuclear safety is the overriding

priority. The work process includes the identification and management of risk commensurate to the work and the need for coordination with different groups or job activities. Specifically, the site did not implement a process of planning, controlling, and executing work activities to ensure the quality condition of aged MCCBs such that nuclear safety is the overriding priority. Work activities to test or replace degraded safety related circuit breakers were not performed because they had a lower priority than other non-safety-related work activities.

Enforcement:

Violation: Title 10 CFR 50 Appendix B, to 10 CFR Part 50, Criterion XVI, "Corrective Action," requires, in part, that measures be established to assure conditions adverse to quality are promptly identified and corrected.

Contrary to the above, since 2005, the licensee identified a condition adverse to quality associated with the lack of MCCB testing, but failed to implement measures to assure that the testing deficiencies were corrected in a prompt manner. Specifically, the site failed to restore compliance within a reasonable period of time after a 2013 corrective action violation to ensure that molded case circuit breakers were adequately tested.

Enforcement Action: This violation is being cited because the licensee failed to restore compliance within a reasonable period of time after the violation was identified consistent with Section 2.3.2 of the Enforcement Policy.

Unresolved Item (Open)	Circuit Breaker Quality as a Basic Component URI 05000250,05000251/2024010-06	71111.21 N.04
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Description: The inspectors reviewed the procurement and dedication of 125 VDC MCCBs used as replacements for ITE circuit breakers in the 3D23 Vital DC switchboard. The documentation provided to the inspectors left concerns related to the dedication processes used to confirm the breaker quality as a basic component. The traceability and provenance of the MCCBs are in question. The licensee has experienced a significant level of inferior quality with these MCCBs prior to having the distributor weed out bad quality MCCBs before shipping them to the site. The CGD used bulletin (BL) 88-10 to justify the acceptability of apparent gaps in the MCCB traceability and provenance. However, BL 88-10 specified that "molded-case CBs installed in safety-related applications after August 1, 1988, should be:

1. Manufactured by and procured from a CBM under a 10 CFR 50, Appendix B, program; or
2. Procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related by the licensee or others using an acceptable dedication program. The NRC encourages addressees to significantly upgrade their dedication programs through a joint industry effort to ensure their adequacy and consistency. The NRC will monitor these industry initiatives and if they are not sufficient or not timely, or if problems with the dedication of commercial grade equipment for safety related use continue, the NRC will take appropriate regulatory actions.

(BL 88-10, "Nonconforming Molded-Case Circuit Breakers," accession number ML031220261)

Planned Closure Actions: Specifically, the inspectors need to further review the licensee's committed dedication standard (EPRI 3002002982), regarding the adequacy of the critical characteristics, existing commercial qualifications, CGD sampling criteria, as well as licensee-

directed vendor tests used for screening nonconforming breakers before an order is sent for CGD. In addition, the inspectors need to confer with NRR regarding the items above and the licensee use of BL 88-10 to justify this CGD application,

Licensee Actions: The licensee entered the issue into the corrective action program.

Corrective Action References: AR 2482016

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On March 22, 2024, the inspectors presented the A debrief was conducted instead of an exit because of delayed information regarding the intake structure reinforcement repairs. inspection results to Michael Strobe and other members of the licensee staff.
- On March 29, 2024, the inspectors presented the design basis assurance inspection (programs) inspection results to Michael Strobe and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.04	Calculations	C-SJ611-01	Evaluation of the Intake Structure Walls to Determine The Margin in the Reinforcing Steel	2
71111.21N.04	Corrective Action Documents	02-1639_100102	Water Leak from AFW piping	08/21/2002
71111.21N.04	Corrective Action Documents	02-1991	AFW Steam Piping	11/20/2002
71111.21N.04	Corrective Action Documents	02343114	DBAI 2020- Cable AMP Discrepancy for Opposite Unit SUT	03/09/2020
71111.21N.04	Corrective Action Documents	02344617	DBAI 2020 - Re-Evaluate Testing Performed on Sut Cross Tie	02/13/2020
71111.21N.04	Corrective Action Documents	02362595	Lack of Robust Lightning Mitigation Sys Makes PTN Vulnerable	07/13/2020
71111.21N.04	Corrective Action Documents	02435456	Recommended Action for MH306 and MH320 at PTN	
71111.21N.04	Corrective Action Documents	421994		
71111.21N.04	Corrective Action Documents	AR 2359905	Condition Assessment – Phase A Report, Turkey Point Unit 3 Bays 3A1, 3A2, 3B1, 3B2 and East Wall Intake Structure Life Extension (January 6, 2022)	3
71111.21N.04	Corrective Action Documents	AR 2415332	Condition Assessment – Phase A Report, Turkey Point Unit 4 Bays 4A1, 4A2, 4B1 and 4B2 Intake Structure Life Extension (May 11, 2022)	2
71111.21N.04	Corrective Action Documents	AR 2472658	Repair Concrete In 4A1 Intake Bay Was Not As Expected	11/17/2023
71111.21N.04	Drawings	5610-023-DB-002	Component Design Requirements Document Emergency Power System	05/09/2019
71111.21N.04	Drawings	5610-E-301	Grounding Notes, Symbols and Notes	2
71111.21N.04	Drawings	5610-E-49	Cathodic Protection System Design Turkey Point Intake Rectifier Installation Details	0
71111.21N.04	Drawings	5610-M-738	Emergency Diesel Generator Fuel Oil Piping Plan, Section, & Isometric	Rev. 1
71111.21N.04	Drawings	5613-M-16-101	EMERGENCY DIESEL GENERATOR 3B AUXILIARY	3

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			RELAY CABINET 3C370D	
71111.21N.04	Drawings	EC296652-C-001	Intake Structure Structural Repairs General Notes & Repair Notes, Sheet 2	Rev. 1
71111.21N.04	Drawings	EC296652-C-001	Intake Structure Structural Repairs General Notes & Repair Notes, Sheet 3	0
71111.21N.04	Drawings	EC296652-C-006	Intake Structure Structural Repairs 4A1 Plan, Elevations & Sections, Sheet 1	Rev. 1
71111.21N.04	Engineering Changes	299374	Install new ground grid intertie with a route from the switchyard ground grid across Safe Net bridge and tie into the station ground grid.	02/01/2024
71111.21N.04	Engineering Changes	299374, Attachment 01	Evaluation of Ground Grid Testing	Rev 0`
71111.21N.04	Engineering Changes	5610-E-50	Main Plant Area Duct Runs, Grounding	Rev 17
71111.21N.04	Engineering Changes	EC 290881	Design Equivalent Change Package - 4KV SWITCHGEAR ROOM CHILLER REPLACEMENTS	12
71111.21N.04	Engineering Changes	EC 296652	Intake and ICCP Replacement and Structural Repairs	2
71111.21N.04	Engineering Changes	FCR 010	Field Change Request: Intake Structure - Fine Screen Framework Repair	2
71111.21N.04	Engineering Changes	IO#T%13469	Turkey Point 230kV Switchyard Grounding Report	0
71111.21N.04	Engineering Evaluations	00488568	PTN 30A Breaker Seismic testing for 30A MB	07/26/2021
71111.21N.04	Engineering Evaluations	00491159	PTN 50A Breaker Seismic testing for 50A MB	09/15/2022
71111.21N.04	Engineering Evaluations	0486604	PTN 20A Breaker Seismic testing for 20A MB	03/03/2022
71111.21N.04	Engineering Evaluations	PTN-ENG-LRAM-00-0043	PERIODIC SURVEILLANCE AND PREVENTIVE MAINTENANCE PROGRAM	0
71111.21N.04	Engineering Evaluations	PTN-ENG-LRAM-99-0124	AGING MANAGEMENT REVIEW PLANT VENTILATION SYSTEMS	05/14/2001
71111.21N.04	Engineering Evaluations	TKP211101R0-F	Outage Testing of Low Voltage Control Cables Installed at Turkey Point Unit 3	11/19/2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.04	Miscellaneous	Eval 488568	Process evaluation	03/26/2024
71111.21N.04	Miscellaneous	PTN-ENG-LRAM-00-0042	Systems and Structures Monitoring Program – License Renewal Basis Document	13
71111.21N.04	Miscellaneous	QSL Number 469	Qualified Supplier List: International Quality Consultants	03/25/2024
71111.21N.04	Procedures	0-ADM-561	Structures Monitoring Program	15
71111.21N.04	Procedures	0-ADM-564	Systems/Programs Monitoring	10
71111.21N.04	Procedures	0-GMM-102.33	Manhole Inspection	Rev 14A
71111.21N.04	Procedures	0-GMM-111.01	Concrete Placement	Rev. 0
71111.21N.04	Procedures	0-GMP-102.22	Grout Placement	1B
71111.21N.04	Procedures	4-NOP-005	Normal Operating Procedure 4KV Buses A, B, and D	Rev 18
71111.21N.04	Procedures	87-263	Design Basis Document For Emergency Diesel Generator	Rev. 10
71111.21N.04	Procedures	CN-2.11	Specification for Concrete Testing, Placing, Curing and Finishing	7
71111.21N.04	Procedures	ENG-CSI-XCI-100	External Corrosion (XCI) Monitoring Program for Insulated Piping for PSL and PTN License Renewal	Rev 6
71111.21N.04	Procedures	ER-AA-106	Cable Condition Monitoring Program	Rev 7
71111.21N.04	Procedures	ER-AA-204	Preventive Maintenance Program Strategy	Rev 13
71111.21N.04	Procedures	PTN-ENG-LRAM-01-0044	Containment Cable Inspection Program – License Renewal Basis Document	Rev 3
71111.21N.04	Procedures	SPEC-E-012	Engineering Maintenance Specification Form	Rev. 11
71111.21N.04	Procedures	SPEC-E-020	Cable Inspection Program Turkey Point Units 3 and 4	Rev 4
71111.21N.04	Self-Assessments	PMC-23-000988	PTN FMR and VMR relay replacement frequency update	07/18/2023
71111.21N.04	Self-Assessments	PTN 30A Breaker CC and FAT Receipt	CGD characteristics, factory acceptance tests and PO 2408932 for 30A MB Breaker	02/11/2021
71111.21N.04	Self-Assessments	PTN 30A Breaker CC with UL Short Circuit Test	Critical Characteristics review and testing for 30A MB breakers	02/14/2014
71111.21N.04	Self-Assessments	PTN 50A Breaker CC with UL Short Circuit Test	Critical Characteristics review and testing for 30A MB breakers	08/14/2014
71111.21N.04	Self-Assessments	PTN 50A Breaker FAT RESULTS	FLORIDA POWER AND LIGHT PURCHASE ORDER: 02436416 FACTORY ACCEPTANCE TEST REPORTS	06/03/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.04	Work Orders	32018705-01	Train 2 - Metallize Aux Feed Pipe	11/25/2002
71111.21N.04	Work Orders	40423478 - 01	0-ADM-534 / NDE 5.28 Rev. 1, Ultrasonic Thickness Measurement of the Unit 4 ST-4-1415 locations 1 & 2. / Report results to PTN Engineering for evaluation.	11/07/2016
71111.21N.04	Work Orders	40526049	3D23-10 125 VDC BREAKER. PRE-OUTAGE INSPECTION	04/11/2020
71111.21N.04	Work Orders	40526049	(FTQ) 3D23-10 REPLACE 125 VDC BREAKER	04/24/2020
71111.21N.04	Work Orders	40526371	(FTQ) 3D23-15 REPLACE 125 VDC BREAKER	04/22/2020
71111.21N.04	Work Orders	40526371	(FTQ) 3D23-15 TEST NEW 125 VDC BREAKER	03/08/2020
71111.21N.04	Work Orders	40733043 03	4AA22: Load Test of Sut Crosstie Cable IAW 4-NOP-005	11/02/2020
71111.21N.04	Work Orders	40773729	.AFW STEAM TRAP INSPECTION TRN 1 LICENSE RENEWAL	05/17/2023
71111.21N.04	Work Orders	40773729-01	Ultrasonic Thickness Measurement of the Unit 3 ST-3-1415 location 1. / Report results to PTN Engineering for evaluation.	05/16/2023
71111.21N.04	Work Orders	40820759-02.	ERECT SCAFFOLD AFW STEAM PIPING INSPECTION	06/08/2023
71111.21N.04	Work Orders	40849728-02	ERECT SCAFFOLD AFW STEAM TRAP INSP TRN 2	11/08/2023
71111.21N.04	Work Orders	NDE-S.28	Inspection Objective/ Criteria: Perform UT inspection of locations at Point 9 (Node NOS) and ST-33 for wall thickness as part of License renewal commitments.	11/09/2011
71111.21N.04	Work Orders	PMID 43695 - 40834381	4B SWGR & LC RM CHILLERS: 4E239B & 4E240B INSPECTION *LR	04/05/2023
71111.21N.04	Work Orders	PMID 43697 - WO 40826796	3B SWGR & LC RM CHILLERS: 3E239B & 3E240B INSPECTION *LR	03/02/2023
71111.21N.04	Work Orders	PMID 43699 - 40810388	4A SWGR & LC RM CHILLERS: 4E239A & 4E240A INSPECTION *L	10/20/2022
71111.21N.04	Work Orders	PMID 43701 - 40798722	3A SWGR & LC RM CHILLERS: 3E239A & 3E240A INSPECTION *LR	08/18/2022
71111.21N.04	Work Orders	PMID 43707 - 40862856	4A LC ROOM A/H UNITS "A" TRAIN: 4E241A/4E242A INSPECTION *LR	10/24/2023
71111.21N.04	Work Orders	PMID 43709 - 40816529	4A SWGR ROOM A/H UNITS: "A" TRAIN 4E243A/4E244A INSPECT * LR	12/14/2022
71111.21N.04	Work Orders	PMID 43709 - 40848949	4B LC ROOM A/H UNITS "B" TRAIN: 4E241B/4E242B INSPECTION *LR	07/29/2023

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.21N.04	Work Orders	PMID 43711 - 40809704	3A LC ROOM A/H UNITS "A" TRAIN: 3E241A/3E242A INSPECTION *LR	10/24/2022
71111.21N.04	Work Orders	PMID 43713 - 40819863	3A SWGR ROOM A/H UNITS: "A" TRAIN 3E243A/3E244A INSPECT * LR	01/14/2023
71111.21N.04	Work Orders	PMID 48768 - 40808730	3A SWGR ROOM A/H UNITS: "A" TRAIN 3E243A/3E244A INSPECT * LR	10/12/2022
71111.21N.04	Work Orders	PMID 48774 - 40798745	3E241 B/3E242B: LC RM AIR HANDLING UNITS QTRLY: 3B *LR*	07/27/2022
71111.21N.04	Work Orders	PMID 48778 - 40872933	4B SWGR ROOM A/H UNITS: "B" TRAIN 4E243B/4E244B INSPECT *LR	01/05/2024
71111.21N.04	Work Orders	PMID 48784 - 40834378	4B LC ROOM A/H UNITS "B" TRAIN: 4E241B/4E242B INSPECTION *LR	04/04/2023
71111.21N.04	Work Orders	WO 32018700-01	Train 1 - Metallize Aux Feed Pipe	10/29/2002
71111.21N.04	Work Orders	WO 40809094-01	PTN Unit 04 WO 40809094	1
71111.21N.04	Work Orders	WO 40855521-26	EC 296652, 4A1 Intake Struct Concrete & CP Repairs (CAP)	Rev. 0