



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8931

March 3, 2008

Florida Power and Light Company
ATTN: Mr. J. A. Stall, Senior Vice President
Nuclear and Chief Nuclear Officer
P. O. Box 14000
Juno Beach, FL 33408-0420

**SUBJECT: ANNUAL ASSESSMENT LETTER – TURKEY POINT NUCLEAR PLANT
(NRC INSPECTION REPORT 05000250/2008001 AND 05000251/2008001)**

Dear Mr. Stall:

On February 7, 2008, the NRC staff completed its performance review of the Turkey Point Nuclear Plant. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 2007. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility.

This performance review and enclosed inspection plan do not include security information. A separate letter designated and marked as "Official Use Only--Security Information" will include the security cornerstone review and resultant inspection plan.

Overall, Turkey Point Units 3 and 4 operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for Turkey Point Unit 3 was within the Licensee Response Column of the NRC Action Matrix for the last two quarters of CY 2007 and within the Regulatory Response Column for the first two quarters of CY 2007, because of a single White inspection finding in the Initiating Events cornerstone, originally identified during the third quarter of 2006. This White finding was associated with a loss of decay heat removal capability during a period of reduced reactor coolant inventory which reflected performance at a level requiring increased regulatory response. Therefore, in addition to the reactor oversight process baseline inspection program, a Supplemental Inspection using Inspection Procedure (IP) 95001, "Inspection for One or Two White Inputs In a Strategic Performance Area," was conducted during the week of April 9, 2007, and no findings of significance were identified.

Plant performance for Turkey Point Unit 4 for the most recent quarter as well as the previous three quarters was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green).

Additionally, in our mid-cycle assessment letter dated August 31, 2007, we advised you of the continuation of a substantive cross-cutting issue in the problem identification and resolution area involving weaknesses in the thorough evaluation of identified problems (P.1.c). The end-of-cycle assessment of this cross-cutting issue included a review of inspection results over the 12-month period from January 1 through December 31, 2007.

During this period, the inspectors reviewed licensee improvement initiatives and noted some improvements. A focused inspection to evaluate the effectiveness of your corrective action program (CAP) improvement initiatives was completed on December 17, 2007. There were no new inspection findings identified during this review. The inspection team noted that you had recently implemented a pilot process, in November 2007, to aid in reducing the backlog and improving the timeliness and quality of condition reports (CR). The team also found that you had completed your analysis of the most recent safety conscious work environment (SCWE) and site culture surveys, had identified areas needing improvement, and had scoped and planned actions to address these identified issues. The team also highlighted key planned activities such as the addition of a new CAP improvement management team in January 2008 and the planned conversion of your work processes to the Passport System in 2009. These new initiatives were recognized as positive moves to address the identified weaknesses.

The inspection team also documented five examples where important corrective actions to prevent recurrence (CAPRs) had not been fully implemented to address weaknesses associated with CR 2006-25531, which addressed the substantive cross-cutting issue identified in 2006. These corrective actions had not been completed, partly due to the large number of changes made to the CAP improvement plan and the Turkey Point "Road to Excellence Plan" which appeared to place more emphasis on CAP backlog reduction and not the corrective actions to address the PI&R substantive cross-cutting issue from 2006.

In one instance, the team identified that required periodic reviews of trend reports by the newly established condition report oversight group (CROG) had not been performed during 2nd and 3rd quarter 2007, resulting in a missed opportunity for the CROG to identify that certain department level performance monitoring groups (Corrective Action Review Boards – CARBs) had failed to submit completed trend reports because of competing priorities and other routine job activities (especially, the impact of a 3rd quarter refueling outage).

In a second instance, it was noted that considerable turnover within the initial group of corrective action program coordinators (CAPCOs). Only thirteen of the initial twenty-three CAPCOs remained. CAPCOs are assigned to effectively monitor the CAP expectations for the departments and carry out specific duties aimed at reducing the backlog of work orders and condition reports. The inspectors noted multiple examples where selected CAPCOs had not completed formal training qualifications and, in other cases, the CROG had not completed a timely review and approval process for several recently qualified CAPCOs that were actively attending and participating in meetings and perform certain condition report evaluations. While most of these CAPCOS had numerous years of nuclear industry experience, most had little

familiarity with Turkey Point plant specific operation or knowledge of its programs and operating history before being assigned.

The NRC has also identified more than three Green inspection findings with documented cross-cutting aspects in problem identification and resolution and an increasing trend in the cross-cutting theme of appropriate and timely corrective action (P.1.d). This increasing trend indicates that the underlying weaknesses within the PI&R cross-cutting area may not yet have been addressed or fully understood to assure consistent and sustainable future performance. Based on these observations, the staff noted that sustained licensee progress will require continued strong management involvement given the number of findings in the problem identification and resolution area. Therefore, this cross-cutting issue will remain open.

Since this is the fourth consecutive assessment letter identifying the same substantive cross-cutting issue, the NRC would normally request that you conduct a safety culture assessment. However, we are aware that a safety culture survey was already completed at Turkey Point during this assessment period. Therefore, we request that you conduct an independent assessment of the effectiveness of your implementation of key CAPRs and the causes behind the failure to complete required training for key individuals assigned responsibility to assess and recommend actions to resolve backlogged, longstanding issues at Turkey Point. This independent assessment should be conducted by individuals that are not associated with the CAP at Turkey Point Nuclear Station or the FP&L corporate office. We also request that you provide the regional office with a schedule for completion of this evaluation, so that we may plan and schedule a follow-up visit to evaluate the scope and results of your review. The NRC will also conduct additional onsite reviews within the upcoming assessment period to continue to evaluate the overall effectiveness of the newly implemented programs. These evaluations will be conducted mainly during planned inspections scheduled for March and June 2008.

The enclosed inspection plan details the inspections, less those related to physical protection scheduled through September 30, 2009. In addition to the ROP baseline inspections, we plan to conduct several non-ROP inspections which include TI 2515/171, Verification of Site Specific (B.5.b) Phase 2 and 3 Mitigation Strategies*- and TI 2515/172, Reactor Coolant System Dissimilar Metal.

The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the mid-cycle review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

FP&L

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If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Marvin Sykes at (404) 562-4629 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA By H. Christensen For/

Joseph W. Shea, Acting Director
Division of Reactor Projects

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

Enclosure: Turkey Point Inspection/Activity Plan (03/01/08 - 09/30/09)

cc w/encl: (See page 3)

cc w/encl:

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Turkey Point
Inspection / Activity Plan
03/03/2008 - 09/30/2009

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	EB3-ISI - U4 INSERVICE INSPECTION		1			
4	IP 7111108P	Inservice Inspection Activities - PWR		04/14/2008	04/18/2008	Baseline Inspections
	PI&R - PREP TRIP-PROBLEM ID AND RESOL		1			
3,4	IP 71152B	Identification and Resolution of Problems		04/28/2008	05/02/2008	Baseline Inspections
	PSB1-RP - RADIATION PROTECTION-ACCESS CONTROLS		1			
3,4	IP 7112101	Access Control to Radiologically Significant Areas		04/28/2008	05/02/2008	Baseline Inspections
3,4	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		04/28/2008	05/02/2008	Baseline Inspections
	EB1-SUMP - TI 2515/166 CONTAINMENT SUMP INSPECTION		1			
4	IP 2515/166	Pressurized Water Reactor Containment Sump Blockage [NRC GENERIC LETTER 2004-02]		05/05/2008	05/09/2008	Safety Issues
	PI&R - PROBLEM IDENTIFICATION AND RESOLUTION		6			
3,4	IP 71152B	Identification and Resolution of Problems		06/09/2008	06/13/2008	Baseline Inspections
3,4	IP 71152B	Identification and Resolution of Problems		06/23/2008	06/27/2008	Baseline Inspections
	EB3TI172 - TI-172		2			
3,4	IP 2515/172	Reactor Coolant System Dissimilar Metal Butt Welds		06/16/2008	06/20/2008	Generic Safety Inspectio
	TI-171 - B.5.B PHASE 2&3		3			
3,4	IP 2515/171	Verification of Site Specific Implementation Of B.5.b Phase 2 & 3 Mitigating Strategies		07/28/2008	08/01/2008	Generic Safety Inspectio
	EB1-CDBI - COMPONENT DESIGN BASIS INSPECTION		9			
3,4	IP 7111121	Component Design Bases Inspection		08/25/2008	08/29/2008	Baseline Inspections
3,4	IP 7111121	Component Design Bases Inspection		09/08/2008	09/12/2008	Baseline Inspections
3,4	IP 7111121	Component Design Bases Inspection		09/22/2008	09/26/2008	Baseline Inspections
3,4	IP 7111121	Component Design Bases Inspection		10/06/2008	10/10/2008	Baseline Inspections
	OL EXAM - INITIAL EXAM PREP		3			
3	V23299	TURKEY POINT/FEBRUARY 2009 EXAM AT POWER FACILITIES		02/02/2009	02/06/2009	Not Applicable
	PSB1EP - EP EXERCISE		3			
3,4	IP 7111401	Exercise Evaluation		02/16/2009	02/20/2009	EP Baseline Inspection
3,4	IP 7111404	Emergency Action Level and Emergency Plan Changes		02/16/2009	02/20/2009	EP Baseline Inspection
3,4	IP 71151-EP01	Drill/Exercise Performance		02/16/2009	02/20/2009	Baseline Inspections
3,4	IP 71151-EP02	ERO Drill Participation		02/16/2009	02/20/2009	Baseline Inspections
3,4	IP 71151-EP03	Alert & Notification System		02/16/2009	02/20/2009	Baseline Inspections
	OL EXAM - INITIAL EXAM		3			
3	V23299	TURKEY POINT/FEBRUARY 2009 EXAM AT POWER FACILITIES		02/23/2009	03/06/2009	Not Applicable
	EB3ISI - UNIT 3 ISI		1			
3	IP 7111108P	Inservice Inspection Activities - PWR		03/16/2009	03/20/2009	Baseline Inspections
	PI&R - PROBLEM IDENTIFICATION AND RESOLUTION		5			
3	IP 71152B	Identification and Resolution of Problems		05/18/2009	05/22/2009	Baseline Inspections

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Turkey Point
Inspection / Activity Plan
03/03/2008 - 09/30/2009

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	PI&R	- PROBLEM IDENTIFICATION AND RESOLUTION	5			
3	IP 71152B	Identification and Resolution of Problems		06/01/2009	06/05/2009	Baseline Inspections
	OL EXAM	- INITIAL EXAM PREP	3			
3	V23313	TURKEY POINT/AUGUST 2009 EXAM AT POWER FACILITIES		07/27/2009	07/31/2009	Not Applicable
	OL EXAM	- INITIAL EXAM - WEEK 1	3			
3	V23313	TURKEY POINT/AUGUST 2009 EXAM AT POWER FACILITIES		08/17/2009	08/21/2009	Not Applicable
	OL EXAM	- INITIAL EXAM - WEEK 2	3			
3	V23313	TURKEY POINT/AUGUST 2009 EXAM AT POWER FACILITIES		08/31/2009	09/04/2009	Not Applicable
	OL EXAM	- INITIAL EXAM - WEEK 3	3			
3	V23313	TURKEY POINT/AUGUST 2009 EXAM AT POWER FACILITIES		09/14/2009	09/18/2009	Not Applicable