



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

September 2, 2014

Mr. Mano Nazar  
President and Chief Nuclear Officer  
Nuclear Division  
NextEra Energy  
P.O. Box 14000  
Juno Beach, FL 33408-0420

**SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR TURKEY POINT NUCLEAR  
GENERATING UNIT 3 AND UNIT 4 – NRC REPORT 05000250/2014006 AND  
05000251/2014006**

Dear Mr. Nazar:

On August 12, 2014, the NRC completed its mid-cycle performance review of Turkey Point Nuclear Generating Unit 3 and Unit 4. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2013, through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, Turkey Point Nuclear Generating Unit 3 and Unit 4 operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Turkey Point Nuclear Generating Unit 3 and Unit 4 during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The NRC issued an assessment follow-up letter (ADAMS accession number ML13127A106) to you on May 6, 2013, indicating that Turkey Point Unit 3 had moved to the Regulatory Response Column of the ROP Action Matrix as of the first quarter of 2013 due to three reactor trips that caused the PI to cross the Green-to-White threshold. On March 7, 2014, the NRC completed a supplemental inspection under Inspection Procedure 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area," which determined that your staff's evaluation identified the primary root and contributing causes for each of the reactor trips that contributed to the white performance indicator. The supplemental inspection report was issued on April 3, 2014, as Inspection Report 05000250/2014008 (ADAMS accession number ML14094A305). The NRC issued an assessment follow-up letter to you on May, 6, 2014, indicating that the performance at Turkey Point Unit 3 had returned to the Licensee Response Column of the ROP Action Matrix as of April 3, 2014.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The NRC identified a cross-cutting theme in the human performance area. Specifically, four findings spread across the Initiating Events and Mitigating Systems cornerstones were assigned the 'Procedural Adherence' cross-cutting aspect (H.8) during this assessment period. The NRC reviewed your staff's root cause evaluation and determined that a substantive cross-cutting issue (SCCI) associated with aspect H.8 does not exist. This conclusion was based on the recognition that the corrective action program needs a reasonable amount of time to implement the corrective actions identified by your staff as well as to determine if those corrective actions have been effective in addressing procedure adherence issues at Turkey Point. The NRC will continue to monitor your staff's effort and progress in addressing the theme until the theme criteria are no longer met.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

The NRC also plans on conducting one non-routine inspection. Temporary Instruction 2515/189, "Inspection to Determine Compliance of Dynamic Restraint (Snubber) Program with 10 CFR 50.55a, 'Regulatory Requirements for Inservice Examination and Testing of Snubbers'," will be conducted by regional inspectors and has been included in the attached inspection plan.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of a Safety Evaluation for the site.

The date for the onsite component at your site is being coordinated with your staff. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be 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).

Please contact David Dumbacher at (404) 997-4748 with any questions you have regarding this letter.

Sincerely,

**/RA/**

Joel T. Munday, Director  
Division of Reactor Projects

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

Enclosure: Turkey Point Inspection/Activity Plan  
(09/01/2014 – 12/31/2015)

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M. Nazar

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ADAMS: ☐ Yes ☐ No    ACCESSION NUMBER: \_\_\_\_\_    ☒ SUNSI REVIEW COMPLETE    ☒ FORM 665 ATTACHED

OFFICE	RII:DRP	RII:DRP	RII:DRP		
SIGNATURE	SAS /RA/	DED /RA/	JTM /RA/		
NAME	SSandal	DDumbacher	JMunday		
DATE	8/28/2014	8/28/2014	8/29/2014		
E-MAIL COPY?	YESNO	YESNO	YESNO	YESNO	YESNO

OFFICIAL RECORD COPY    DOCUMENT NAME: S:\DRP\PERIODIC ASSESSMENTS & REPORTS\EOC & MID-CYCLE\2014\MID-CYCLE\ADMIN WORKING FOLDER\LETTERS\TURKEY POINT MID-CYCLE LTR 2014.DOCX

Letter to Mano Nazar from Joel T. Munday dated September 2, 2014.

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR TURKEY POINT NUCLEAR  
GENERATING UNIT 3 AND UNIT 4 – NRC REPORT 05000250/2014006 AND  
05000251/2014006

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ROP Assessment

Institute of Nuclear Power Operations (INPO)

**Turkey Point**  
**Inspection / Activity Plan**  
**09/01/2014 - 12/31/2015**

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
Start	End				
			<b>ISI - UNIT 4 IN-SERVICE INSPECTION &amp; RVH EXAM</b>		<b>2</b>
4	10/06/2014	10/10/2014	IP 7111108P	Inservice Inspection Activities - PWR	
			<b>TI-189 - DYNAMIC RESTRAINT (SNUBBER) PROGRAM</b>		<b>1</b>
3,4	10/06/2014	10/10/2014	IP 2515/189	Inspection to Determine Compliance of Dynamic Restraint (Snubber) Program with 10 CFR 50.55a	
			<b>RP - RADIOLOGICAL HAZARDS AND TRANSPORTATION</b>		<b>2</b>
3,4	10/06/2014	10/10/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
3,4	10/06/2014	10/10/2014	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
3,4	10/06/2014	10/10/2014	IP 71151	Performance Indicator Verification	
			<b>RP - RP PUBLIC RADIATION SAFETY BASELINE</b>		<b>3</b>
3,4	11/17/2014	11/21/2014	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
3,4	11/17/2014	11/21/2014	IP 71124.07	Radiological Environmental Monitoring Program	
3,4	11/17/2014	11/21/2014	IP 71151	Performance Indicator Verification	
			<b>OL EXAM - INITIAL LICENSE EXAM PREP</b>		<b>3</b>
3	12/15/2014	12/19/2014	V23450	TURKEY POINT/JANUARY 2015 INITIAL EXAM AT POWER FACILITIES	
			<b>OL EXAM - INITIAL LICENSE EXAM</b>		<b>3</b>
3	01/19/2015	01/23/2015	V23450	TURKEY POINT/JANUARY 2015 INITIAL EXAM AT POWER FACILITIES	
			<b>MODS - PLANT MODIFICATION INSPECTION</b>		<b>6</b>
3,4	01/26/2015	01/30/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
3,4	02/02/2015	02/06/2015	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
			<b>EP - EP EXERCISE</b>		<b>5</b>
3,4	02/23/2015	02/27/2015	IP 7111404	Emergency Action Level and Emergency Plan Changes	
3,4	02/23/2015	02/27/2015	IP 7111407	Exercise Evaluation - Hostile Action (HA) Event	
3,4	02/23/2015	02/27/2015	IP 71151	Performance Indicator Verification	
			<b>OL RQ - RQ INSP</b>		<b>2</b>
3,4	08/31/2015	09/04/2015	IP 7111111B	Licensed Operator Requalification Program	
			<b>ISI - UNIT 3 IN-SERVICE INSPECTION</b>		<b>1</b>
3	10/26/2015	10/30/2015	IP 7111108P	Inservice Inspection Activities - PWR	
			<b>RP - RP OCCUPATIONAL BASELINE WEEK 1</b>		<b>2</b>
3,4	11/02/2015	11/06/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
3,4	11/02/2015	11/06/2015	IP 71124.02	Occupational ALARA Planning and Controls	
3,4	11/02/2015	11/06/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
3,4	11/02/2015	11/06/2015	IP 71124.04	Occupational Dose Assessment	
3,4	11/02/2015	11/06/2015	IP 71124.05	Radiation Monitoring Instrumentation	

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

Enclosure

**Turkey Point**  
**Inspection / Activity Plan**  
**09/01/2014 - 12/31/2015**

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
RP - RP OCCUPATIONAL BASELINE WEEK 1					2
3, 4	11/02/2015	11/06/2015	IP 71151	Performance Indicator Verification	
RP - RP OCCUPATIONAL BASELINE WEEK 2					3
3, 4	11/16/2015	11/20/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
3, 4	11/16/2015	11/20/2015	IP 71124.02	Occupational ALARA Planning and Controls	
3, 4	11/16/2015	11/20/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
3, 4	11/16/2015	11/20/2015	IP 71124.04	Occupational Dose Assessment	
3, 4	11/16/2015	11/20/2015	IP 71124.05	Radiation Monitoring Instrumentation	
3, 4	11/16/2015	11/20/2015	IP 71151	Performance Indicator Verification	