

From: [Thomas Saporito](#)
To: [Klett, Audrey](#)
Cc:
Subject: [External_Sender] 2.206 Petition TPN UHS TEMP
Date: Wednesday, August 05, 2015 5:32:06 AM

Ms. Klett:

This serves as a response to the NRC's July 27, 2015 Proposed Director's Decision related to the 2.206 Enforcement Petition which sought NRC enforcement action against the licensee of the Turkey Point Nuclear Plant (TPN) regarding the UHS temperature via the cooling canal system.

The NRC's Proposed Director's Decision is "flawed" inaccurate and incomplete - as the proposed decision relied on an NRC field inspection report "ML14199A107" - as referenced by the NRC in its July 27, 2015 Proposed Director's Decision - at pp. 4-5 - documenting that **"The licensee determined the root cause of the event was a lack of monitoring the overall 'health' of the cooling canal system and its impact on the UHS TS temperature limit"**. (emphasis added)

However, during a teleconference call with the NRC PRB - I provided the NRC with documents showing a significant increase in the cooling canal water temperature (UHS) - following the power uprate of the TPN facility. The increased UHS water temperature was documented in a chart provided to the NRC PRB and was apparently related directly to the power uprate. To the extent that introduction of additional "heat" to the UHS was the likely cause of increased algae growth in the UHS cooling canal system - the licensee failed to correctly diagnose and correct the "root cause" of the increase in the UHS temperature - related to algae growth. Thus, the NRC's field inspection and the NRC's Proposed Director's Decision are "flawed" and not conclusive and dispositive of the 2.206 Enforcement Petition.

In closing, I request that the NRC conduct further inspection activities at the licensee's facility regarding the above nuclear safety issue - and require the licensee to conduct further "root cause" determination related to the increased algae growth - and increased UHS temperature - following the power upgrade of the TPN facility.

To the extent that the NRC's actions in this matter are currently the subject of an ongoing NRC Inspector General investigation - I request that a copy of this electronic communication be provided to the NRC OIG accordingly.

Should you have any questions regarding the above, please do not hesitate to contact me at your convenience.

Regards,
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