

Turkey Point 4

2Q/2012 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Mar 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Emergency lighting to auxiliary feedwater area disabled

The inspectors identified a non-cited violation of the Units 3 and 4 operating licenses condition 3.D, Fire Protection, when the licensee failed to provide emergency lighting in the common auxiliary feedwater (AFW) cage and other areas. The electrical panel that supported normal lighting in the area was taken out of service for maintenance thus placing the emergency lights on battery power until the batteries depleted and the areas became dark, impacting the ability of operators to complete manual actions in the area, if needed. The licensee documented the issue in the corrective action program (CAP) as AR 1738082.

The inspectors determined that the failure to provide emergency lighting in areas requiring local manual actions to safely mitigate certain fire events, and the associated access/egress routes, was a performance deficiency. The issue was more than minor because the objective of the Mitigating System Cornerstone to ensure the availability of fire protection equipment was affected when emergency lighting was not provided. The inspectors assessed the finding using NRC Manual Chapter 0609, Appendix F, "Fire Protection Significance Determination Process," and assigned a low degradation rating because of the reasonable likelihood that plant operators would obtain alternate lighting and complete the prescribed manual actions. The finding screened as having very low safety significance. The cross cutting aspect of Work Control – Planning, (H.3(a)), was assigned because the licensee did not use risk insights, did not assess environmental conditions (lighting) that may have impacted human performance, and did not plan for contingencies nor compensatory actions when the normal lighting was removed from service leading to loss of emergency lighting.

Inspection Report# : [2012002](#) (*pdf*)

Significance:  Mar 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Control power cables repeatedly submerged in ground water, contrary to design

A self-revealing non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified when FPL did not maintain safety-related power cables in the environment for which they were designed and tested. Specifically, 125 volt DC control power cables feeding various safety related components and cables supporting other risk significant equipment had been repeatedly submerged in ground water for extended periods of time and this submergence had the potential to affect the ability of the cables to perform safety related functions. The issue was entered into the licensee's CAP as AR 1717619. Although predominantly Unit 3 cables were submerged, because equipment is shared, both units were affected.

Allowing water accumulation in the manhole(s) after disabling of the sump pump without compensatory measures to keep the safety related and risk significant cables dry, resulted in subjecting the cables to an environment for which they were not designed, and was a performance deficiency. The finding was more than minor because it challenged the reliability of systems that respond to initiating events to prevent undesirable consequences, which is an attribute of

the Mitigating Systems cornerstone. The inspectors evaluated the finding in accordance with IMC 0609.04, Phase 1, "Initial Screening and Characterization of Findings." The finding was of very low safety significance because it did not represent an actual loss of safety function or contribute to external event core damage sequences. The finding had a cross-cutting aspect in Problem Identification and Resolution, Corrective Action Program, (P.1(c)), because FPL did not thoroughly evaluate submerged cables such that the resolutions addressed causes and extent of conditions, including evaluating for operability.

Inspection Report# : [2012002](#) (pdf)

Significance:  Dec 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Correct Valve Deficiency Results in Both Headers of Intake Cooling Water Inoperable

A self-revealing Non-cited violation of 10 CFR 50 Criterion XVI was identified when the licensee failed to correct a degraded butterfly valve in the Unit 3 intake cooling water system. On August 11, 2011, failure of this valve led to a loss of intake cooling water (ICW) flow to the component cooling water heat exchangers. The licensee documented the failure in their corrective action program as AR 01680272 and initiated a cause investigation. An NRC special inspection of this occurrence was documented in NRC Inspection Report 05000250/2011013.

The licensee's failure to take prompt corrective actions for a degraded valve, though it had been identified in 2007 as vibrating excessively, was a performance deficiency. This performance deficiency was considered more than minor because it could be reasonably viewed as a precursor to a significant event, the loss of all intake cooling water. A Senior Reactor Analyst in a Phase 3 risk assessment, determined the increase in risk to either unit was of very low risk significance i.e., Green. Unit 3 risk was assessed because the event occurred on that unit; however Unit 4 risk was also assessed because the same vulnerability existed on the ICW valves on that unit (e.g., similar design, maintenance history, etc.). The main contributors to the low risk results were: 1) the recovery probability of the ICW system, given the extended time available to operators before a RCP seal LOCA could occur; and 2) the multiple redundant sources available to cool the core should the CCW system fail. The dominant core damage scenarios were valid demands for a reactor trip followed by the failure to recover ICW proceeding to a RCP seal LOCA and core damage. The inspectors determined that the cause of this finding was related to the Problem Identification and Resolution cross cutting component when the licensee failed to take appropriate corrective action to address safety issues (valve fluttering) in a timely manner, commensurate with the safety significance.

Inspection Report# : [2011005](#) (pdf)

Significance:  Aug 12, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Verify or Check the Adequacy of Design for Safety-Related Components with Four Examples

The team identified a Green non-cited violation (NCV) of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to verify or check the adequacy of design for with four examples. The licensee entered these issues into their corrective action program as ARs 1672459, 1676403, 1674790, 1675544 and 1679053, and performed evaluations to assure operability of components.

The licensee's failure to adequately perform engineering evaluations as described in the four examples was a performance deficiency. The performance deficiency was more than minor because it adversely affected the Mitigating Systems cornerstone attribute of Design Control 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 deficiencies described above, resulted in a reasonable doubt that safety-related equipment could perform their functions under the most limiting conditions. In accordance with NRC IMC 0609.04, "Initial Screening and Characterization of Findings", the inspectors conducted a Phase 1 Significance Determination Process (SDP) screening and determined the finding to be of very low safety significance (Green) because it was a design deficiency confirmed not to result in the loss of operability or functionality. Specifically, the licensee performed evaluations that provided reasonable assurance that the components would perform their required functions

when called upon. The team determined that no cross cutting aspect was applicable to this performance deficiency because this finding was not indicative of current licensee performance.

Inspection Report# : [2011008](#) (pdf)

G

Significance: Aug 12, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Maintain Adequate Records to Support Acceptance Criteria in Design Calculations

. The team identified a NCV of 10 CFR Part 50, Appendix B, Criterion

XVII, "Quality Assurance Records," for the licensee's failure to maintain sufficient records to furnish evidence of activities affecting quality. Specifically, the licensee was not able to retrieve test data and calculations supporting an acceptance criterion that assures the reliability and availability of minimum MCC voltage to provide adequate voltage to MCC control circuits. The licensee entered these issues into their corrective action program as AR 1676661 and has proposed actions to (1) implement a design modification to increase the control power transformer size for three motor operated valves (MOV), (2) add the control circuits for the 3 MOVs to the site's low margin list, and (3) re-create missing analysis and test data.

The inspectors determined that the failure to have retrievable test data and calculations to support acceptance criteria for MCC control circuit voltage was a performance deficiency. The finding was more than minor because it affected the Mitigating Systems Cornerstone attribute of Design Control, and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, there was reasonable doubt as to whether safety-related MCC control circuits would have sufficient voltage to function during a degraded voltage condition. The finding was considered to be of very low safety significance (Green) since this was a design deficiency confirmed not to have resulted in a loss of operability or functionality. The team determined that no cross cutting aspect was applicable to this performance deficiency because this finding was not indicative of current licensee performance.

Inspection Report# : [2011008](#) (pdf)

G

Significance: Aug 12, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Voltage Calculations

The team identified a NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to perform adequate voltage calculations for safety-related equipment with two examples. The licensee entered these issues into their corrective action program as ARs 1677149, 1677149-02, 1673843, 1677149-02, 1676754 and 01676641 and performed evaluations to provide reasonable assurance that components would have adequate voltage pending forma re-analysis.

The inspectors determined that the failure to perform adequate design calculations to support the setpoint of the degraded voltage relays and the failure to perform adequate design calculations for the 120Vac instrument system was a performance deficiency. The finding was more than minor because it affected the Mitigating Systems Cornerstone attribute of Design Control, and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, there was reasonable doubt as to whether the components would have adequate voltage to perform their safety function during a degraded voltage condition. The finding was considered to be of very low safety significance (Green) since this was a design deficiency confirmed not to have resulted in a loss of operability or functionality. The team determined that no cross cutting aspect was applicable to this performance deficiency because this finding was not indicative of current licensee performance.

Inspection Report# : [2011008](#) (pdf)

G

Significance: Aug 12, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Test the SBO Cross-Tie under Loaded Conditions

The team identified a NCV of 10 CFR 50.63 for the licensee's failure to test the station blackout (SBO) cross-tie components under loaded conditions. Since 1991, the licensee failed to verify the capability of the SBO cross-tie and associated components to carry the required amperage during post installation tests or subsequent periodic maintenance tests. The licensee entered these issues into their corrective action program as ARs 1676402 and 1680428 with an action to establish a method and frequency for loading the SBO cross-tie components.

The team determined that the licensee's failure to perform adequate post installation testing and periodic testing as required by the licensee's commitment to RG 1.155, "Station Blackout," was a performance deficiency. This finding was more than minor because it affected the Mitigating Systems cornerstone attribute of Equipment Performance and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems and components that respond to initiating events to preclude undesirable consequences (i.e. core damage). Specifically, since the installation of cross-tie components to meet SBO requirements, the licensee failed to test the components in a loaded condition. The lack of testing resulted in a reduced reliability of the SBO cross-tie. In accordance with NRC IMC 0609.04, "Initial Screening and Characterization of Findings," the team conducted a Phase 1 SDP screening and determined the finding to be of very low safety significance (Green) because it was not a design issue resulting in loss of function, did not represent an actual loss of a system safety function, did not result in exceeding a TS allowed outage time, and did not affect external event mitigation. The team determined that no cross cutting aspect was applicable to this performance deficiency because this finding was not indicative of current licensee performance.

Inspection Report# : [2011008](#) (pdf)

Barrier Integrity

Emergency Preparedness

Significance: **W** Dec 31, 2011

Identified By: NRC

Item Type: VIO Violation

Failure to maintain TSC habitability

The licensee identified an Apparent Violation (AV) of 10 CFR Part 50.54(q), which requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained. During the periods from December 4, 2010 to July 13, 2011, and from October 10 to October 28, 2011, the licensee failed to maintain in effect a provision of its emergency plan in that adequate emergency facilities and equipment to support emergency response were not provided when portions of the Technical Support Center ventilation system were removed from service by tagging open the ventilation system damper poser supply without compensatory measures and without an evaluation that described how effectiveness of the emergency plan was not decreased. As a result, had the facility been activated, protection of personnel assigned to respond in the TSC would not have been protected from radiological hazards that could occur in some accidents. The licensee documented this occurrence in the corrective actions program as AR 1701357.

The finding was greater than minor because it affected the Emergency Preparedness Cornerstone objective of ensuring that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The Emergency Preparedness cornerstone was affected in that during the time the Technical Support Center was not functional, it did not meet 10 CFR 50.47(b) Planning Standards program elements and personnel assigned to the TSC during an emergency may not have been protected from radiological hazards. This finding was evaluated in accordance with Manual Chapter 0609, Appendix B, Emergency Preparedness Significance Determination Process, Section 4.8 and Emergency Preparedness Significance Determination Process, Sheet 1, Failure to Comply, and determined to be a finding of low to moderate safety significance (White) because there was a loss of

the planning standard function “Adequate facilities and equipment are maintained to support emergency response”. The NRC considered that protection of personnel from radiological hazards could not be assured in all cases when the ventilation system was degraded. The inspectors determined that the Technical Support Center was not functional for a period of longer than 7 days from time of discovery of the ventilation system outage, to the extent that any key ERO member would not be protected from radiological hazards when completing assigned emergency response plan functions in the absence of compensatory measures. This condition occurred twice in December 2010 to July 2011 and again in October 2011. The inspectors determined that the planning standard function failure was a loss of planning standard function, “Adequate facilities and equipment are maintained to support emergency response,” as described in Section 4.8 of Manual Chapter 0609, Appendix B. Using Sheet 1, Failure to Comply, significance determination process flow chart, the failure to comply, with a planning standard problem, no risk significant planning standard problem, with a planning standard function failure, results in a White significance. The two events, December 2010 to July 2011 and October 2011 were assessed as a single finding with a common performance deficiency. The cross cutting component in Problem Identification and Resolution was proposed when the licensee did not thoroughly evaluate problems with the TSC ventilation system as necessary, including properly classifying, prioritizing, and evaluating for operability and reportability, conditions adverse to quality.

10 CFR 50.54(q) requires, in part, that a licensee authorized to operate a nuclear power reactor shall follow and maintain the effectiveness of an emergency plan which meet the standards of 10 CFR 50.47(b). Planning standard 10 CFR 50.47(b)(8) specifies as a required element of a licensee’s emergency response plan that adequate emergency facilities and equipment to support the emergency response are provided and maintained.

Contrary to the above, from December 4, 2010, to July 13, 2011, and from October 10 to October 28, 2011, the licensee failed to maintain the effectiveness of its emergency plan in that adequate emergency facilities and equipment to support emergency response were not provided and maintained. Specifically, the licensee failed to follow and maintain the effectiveness of its emergency plan when portions of the Technical Support Center (TSC) ventilation system were removed from service for maintenance, without compensatory measures. Removal of the TSC ventilation system from service without implementation of compensatory measures during these periods constituted a failure to provide and maintain an adequate emergency facility. This violation is associated with a White Significance Determination Process finding in the Emergency Preparedness cornerstone.

Inspection Report# : [2011005](#) (pdf)

Inspection Report# : [2012010](#) (pdf)

Significance: N/A Dec 31, 2011

Identified By: NRC

Item Type: VIO Violation

Failure to make a required 8 hour NRC report for major loss of emergency assessment capability

The inspectors identified an Apparent Violation of 10 CFR 50.72(b)(3)(xiii) when a major loss of emergency assessment capability was not reported to the NRC within 8 hours as required, impacting NRC’s regulatory function. The TSC ventilation system was removed from service from December 4, 2010 until July 13, 2011, affecting the habitability of the TSC for emergency responders, and the occurrence was not reported. The issue was identified to the licensee by the inspectors after review of NRC Event Number 47387.

The finding was more than minor because it impacted the NRC’s regulatory process, which relies on certain plant conditions being properly reported to the NRC. Because this finding impacted the regulatory process, it was evaluated using traditional enforcement and is being considered for escalated enforcement action in accordance with NRC’s Enforcement Policy. No cross-cutting aspect associated with this issue was identified. 10 CFR 50.72(b)(3)(xiii) states that a licensee shall notify the NRC as soon as practical and in all cases within eight hours of the occurrence of any event that results in a major loss of emergency assessment capability, offsite response capability, or offsite communications capability (e.g., significant portion of control room indication,

Emergency Notification System, or offsite notification system).

Contrary to the above, from December 4, 2010, to July 13, 2011, the licensee failed to report the occurrence of a major loss of emergency assessment capability. Specifically, the licensee failed to maintain an adequate emergency facility when portions of the TSC ventilation system were removed from service without compensatory measures, and the licensee failed to report the occurrence as required.

This is a Severity Level III violation (Enforcement Policy paragraph 6.6)
Civil Penalty - \$ 140,000

Inspection Report# : [2011005](#) (*pdf*)

Inspection Report# : [2012010](#) (*pdf*)

Occupational Radiation Safety

Public Radiation Safety

Security

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

Significance: SL-IV Aug 12, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Update the UFSAR to Reflect Changes to the Unit 3 Fuel Oil Storage and Transfer System

The team identified a SL-IV NCV for the licensee's failure to update the Updated Final Safety Analysis Report (FSAR) for a modification affecting the Unit 3 emergency diesel generator fuel oil storage tank. Specifically, a common-mode failure method was not described in the UFSAR that required proceduralized manual actions during design bases rain events. The licensee entered these issues into their corrective action program as AR 1679078.

The failure to update the UFSAR as required by procedure ENG Q1-3.4 and 10 CFR 50.71(e) was a performance deficiency. This performance deficiency was considered as traditional enforcement because, not having an adequately updated UFSAR hinders the licensee's ability to perform adequate 10 CFR 50.59 evaluations and can impact the NRC's ability to perform its regulatory function such as, license amendment reviews and inspections. In addition, the team determined that the performance deficiency was material to safety because the modification resulted in a common-mode failure method that required proceduralized manual actions for the Unit 3 EDGs to meet their mission time during design bases rain events. This violation was determined to be a SL-IV violation using Section 6.1 of the NRC's Enforcement Policy because the erroneous information was not used to make an unacceptable change to the

facility or procedures. Cross-cutting aspects are not assigned for traditional enforcement violations.

Inspection Report# : [2011008](#) (*pdf*)

Last modified : September 12, 2012