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February 16, 2011

L-2011-060

10 CFR 55.31

Victor M. McCree
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Marquis One Tower
245 Peachtree Center Ave., NE Suite 1200
Atlanta, GA 30303-1257

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Preliminary License Re-application for Mr. Marshall W. Morris

On December 2, 2010, the Nuclear Regulatory Commission (NRC) informed Mr. Marshall W. Morris that he did not pass the Administrative Topics portion of the SRO examination taken during the week of November 10, 2010, at the Turkey Point Nuclear Plant and as a result the NRC denied his application. As stated in the NRC letter dated December 2, 2010, and in accordance with 10 CFR 55.35, Re-application, Mr. Morris is eligible to re-apply for a license two months after the date of the denial.

Additionally, since Mr. Morris has passed the Written Examination, the Systems Job Performance Measures (JPMs) and the Simulator Operating Tests, Mr. Morris is eligible to request a routine waiver from those portions of the SRO examination. Accordingly, on January 18, 2011, FPL submitted a waiver request for Mr. Morris to re-take the Administrative Topic portion of the SRO Examination.

The purpose of this letter is to provide the preliminary License Application and sufficient details on the additional training that Mr. Morris has completed to prepare for the re-take of the Administrative Topic portion of the SRO examination.

Enclosure 1 provides the preliminary License Application (NRC Forms 396 and NRC Forms 398 for:

Operator:	License #:	Docket #:
Morris, M.W.	N/A	██████████

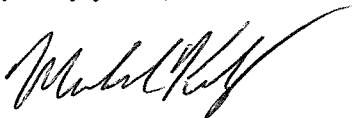
Enclosure 1 to this letter contains personal information, the disclosure of which would clearly constitute an unwarranted invasion of personal privacy. Pursuant to 10 CFR 2.390(a)(6), we request that Enclosure 1 of this letter be withheld from public disclosure.

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The details on the additional training taken by Mr. Morris are provided in Enclosure 2.

Should there be any questions, please contact Mr. Greg Laughlin at (305) 246-6274.

Very truly yours,



Michael Kiley
Vice President
Turkey Point Nuclear Plant

SM

Enclosures

cc: Chief, Operations Branch, Division of Reactor Safety, Region II, USNRC (original and two copies)
Senior Resident Inspector, USNRC, Turkey Point Plant (w/o enclosures)
Document Control Desk, USNRC, Washington, D.C. (w/o enclosures)

L-2011-060
Enclosure 2

1. Background and Details on the Re-application of Mr. Marshall W. Morris

Mr. Marshall Morris had previously applied and taken the Senior Reactor Operator (SRO) licensing examination during the week of 10/25/2010. Mr. Morris passed all portions of the NRC SRO exam, with the exception of the Administrative JPMs. He passed two of the administrative JPMs; the requirement is to pass three. In accordance with 10 CFR 55.35, a re-application that includes a waiver of the other portions of the NRC examination has been submitted for Mr. Morris.

Mr. Morris failed three of the five required Administrative JPMs. He passed all other simulator exams, written exams and JPMs. In JPM "Admin A," the measure was to "Determine if shift manning, 0-ONOP-105, and fire brigade requirements are met." The candidate incorrectly assigned an ANPO to perform attachment 6 of ONOP-105. All other assignments for all other personnel were satisfactory. Mr. Morris incorrectly assumed that the ANPO was also qualified as turbine operator.

In "Admin B" the assignment was to "identify the minimum required contingency action contained in 0-ADM-051, Outage risk assessment and Control." The candidate incorrectly applied the Required Equipment in the procedure. The candidate applied the requirement as two independently powered charging pumps vs. the correct application of two charging pumps capable of being supplied from an EDG. All other actions were properly determined.

In "Admin C" the requirement was to "Determine any required Technical Specification actions, any required notifications, and any administrative actions." The candidate properly performed all actions with the exception of ADM-115 notifications.

An analysis of these three failures as a group indicates that the candidate made assumptions that were not provided in the data, or, interpreted requirements in a more conservative approach than was accounted for in the procedure. Mr. Morris did not possess sufficient administrative procedure knowledge, particularly some incidental details or knowledge gaps that come with time and practice in performing administrative activities, to properly apply the requirements to the situations presented in the JPMs. Based on this analysis, a remediation program was designed and implemented for his improvement.

2. Remediation Plan for Mr. Marshall W. Morris Re-take of the Administrative Topic Portion of the SRO Examination

1. Candidate to independently review and study the below listed Administrative Procedures. This review should include a determination of possible hypothetical conditions and development of "JPM" style scenarios. This is designed to help the candidate establish a correct mental model and interpretation requirements. Any questions to be discussed with the class Mentor/Instructors.
2. Candidate to perform ten (10) practice Administrative JPMs. Each JPM should be followed by a verbal explanation of why he took each step of the JPM and why that is correct for the conditions given.
3. Candidate to successfully perform two (2) practice exam sets of five (5) Administrative JPMs each.
4. Candidate to successfully pass an Audit Exam of five (5) Administrative JPMs.

The applicant has completed the remedial training as designed since the original exam:

1. Candidate independently reviewed and studied the designated Administrative Procedures. As planned, this review included a determination of possible hypothetical conditions and development of "JPM" style scenarios. Questions were discussed with the class Mentor or SRO Certified Instructors.
2. Candidate performed ten (10) practice Administrative JPMs in accordance with the remediation plan.
3. Candidate successfully completed two (2) practice exam sets of five (5) Administrative JPMs each.
4. Candidate successfully passed an Audit Exam of five (5) Administrative JPMs.

3. Remedial Assessment:

Mr. Morris has completed the above remedial plan required activities. Mr. Morris is continuing to perform practice JPMs and review of other Administrative duties in preparation for his SRO re-take examination and is showing a great improvement in his ability to understand the initial conditions, utilize the appropriate procedure and verbalize his reasoning for each step of the JPMs. We are confident in that Mr. Morris will be successful on his re-take of the Administrative portion of the NRC exam.

4. List of Procedures and discussions performed during the remediation process.

Procedure	Title	Hypothetical Conditions
0-ONOP-105 Staffing, Tech Spec minimum staffing	Control Room Evacuation and Tech Specs	Oncoming shift operator calls in sick.
NAP-402 &ADM-200	Conduct of Operations	Procedure cannot be performed as written. Reactivity management for equipment failures.
0-ADM-031	Independent verification	Usage of IV versus CDV
0-ADM-212 and 212.1	In-Plant Equipment Clearance Orders	Inadequate ECO, boundary modification, computer system fails.
0-ADM-115	Notification of Plant Events	Notifications for FFD, tech spec actions due to equipment failure, RPS actuation.
¾-OSP-024.2	Emergency Bus Load Sequencers Manual Test	Failure of sequencer test and impact on tech specs.
¾-OSP-022.4	EDG Fuel oil Transfer Pump and Valve Test	Test failure impact on tech specs.
¾-OSP 049.1	Reactor Protection System Logic Test	Implications of relay failures, breaker function failures, unsat time response.
0-OSP-023.3	Equipment operability verification with an EDG inoperable.	Impact of missed performance.
0-NOP-061.14A	Waste Gas Disposal System controlled release of gas decay tank A.	Alarm during performance, R-14 OOS, permit review
0-NOP-061,11C	Controlled liquid release from waste monitor tank A	Alarm during performance, R-18 OOS, permit review
0-NCOP-003	Preparation of liquid release Permits	Inaccuracies in permit
0-NCOP-004	Preparation of gas release permits	Inaccuracies in permit
¾-OSP-028.6	RCCA Periodic Exercise	Impact of dropped rod, stuck rod, slow rod, rod out of alignment during performance.
¾-OSP-041.1	Reactor Coolant System Leak Rate Calculation	Use of improper sign polarity during calculations.
0-ADM-009	Containment entries when containment integrity is established.	Failed containment door during containment entry at power.
AD-AA-101-1004	Work Hour Controls	Callout to fill position.

Procedure	Title	Hypothetical Conditions
0-OP-028.2	Shutdown Margin Calculation	Wrong curve book used and incorrect values.
0-OSP-040.4	Estimated Critical Condition	Wrong curve book, incorrect time in core life used and incorrect value polarity.
³ / ₄ -OSP-053.4	Containment Integrity Penetration Alignment Verification.	Incorrect as found position.
0-ADM-205	Administrative control of valves, locks, and switches	Incorrect alignment or position.
0-ADM-503	Temporary System Alteration.	Incorrect application of process.
AD-AA-100-1004	Preparation, revision, review/approval of procedures.	Improper application of process.
0-EPIP-20101	Duties of Emergency Coordinator	Incorrect event classification.
0-EPIP-20111	Re-Entry	Incorrect application of exposure limits.
0-EPIP-20134	Offsite notifications and protective action recommendations.	Incorrect or incomplete notification or PARS.
0-ADM-600	Radiation Protection Manual.	Incorrect RWP used, incorrect classification of rad area, incorrect dose rate calculation
AD-AA-100-1005	Temporary changes to procedures.	Improper application of process.
³ / ₄ -OSP-204	Accident monitoring instrumentation channel checks	Unsat acceptance criteria impact.