

DOCKET NUMBER

PETITION RULE PRM 54-1

Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420

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FPL

(65FR 42305) DOCKETED USNPC

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Ms. Annette Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Florida Power & Light Company Comments
Petition for Rulemaking by Union of Concerned Scientists on 10 CFR Part 54
and 10 CFR Part 51 License Renewal Requirements (Fed. Reg. 65FR42305)

Dear Ms. Vietti-Cook

Florida Power & Light Company (FPL), the owner and operator of the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, hereby submits the following comments on the subject petition for rulemaking. The petition seeks to expand the scope of the license renewal requirements to include the liquid and gaseous radioactive waste systems.

FPL opposes this petition and concurs with the letter of opposition issued by the Nuclear Energy Institute. The NRC should deny the request to amend the license renewal regulations based on the following:

The design and licensing basis of the liquid and gaseous radioactive waste systems are sufficiently conservative such that the assumed catastrophic failure of components in the systems will result in doses substantially below 10 CFR Part 100 guidelines and consistent with 10 CFR Part 20 guidelines. For example, the Turkey Point and St. Lucie Updated Final Safety Analysis Reports (UFSAR) and the Turkey Point License Renewal Application conclude that the offsite radiological consequences of the design basis accidental liquid or gaseous release for Turkey Point are small fractions of the 10 CFR Part 100 guidelines. The radiological inventory in these systems is controlled and limited, and a postulated event or malfunction will not adversely impact public health or safety.

Portions of the Turkey Point liquid and gaseous radioactive waste systems may be included within the scope of license renewal based on criteria stated in 10 CFR Part 54. Components may be included based on intended functions, such as containment isolation or non-safety related components whose failure could affect safety-related components. There is no safety benefit to include the liquid and gaseous radioactive waste systems within the scope of the license renewal rule based on the controlled and limited radioactive inventory in those systems and the very small potential for significant offsite exposure.

We appreciate the opportunity to comment on the petition for rulemaking.

Sincerely yours,

J. A. Stall
Vice President
Engineering

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