

January 29, 2002

Mr. J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS
REGARDING ONE-TIME EXTENSION OF THE INTEGRATED LEAK RATE
TESTING INTERVAL (TAC NOS. MB3249 AND MB3250)

Dear Mr. Stall:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 218 to Facility Operating License No. DPR-31 and Amendment No. 212 to Facility Operating License No. DPR-41 for the Turkey Point Plant, Units Nos. 3 and 4, respectively. The amendments consist of changes to the Technical Specification 6.8.4.h in response to your application dated October 17, 2001.

The amendments would allow a one-time extension of the integrated leak rate testing (ILRT) interval to no more than 15 years after the last ILRT performed.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Kahtan N. Jabbour, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosures:

1. Amendment No. 218 to DPR-31
2. Amendment No. 212 to DPR-41
3. Safety Evaluation

cc w/enclosures: See next page

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FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 218
License No. DPR-31

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (the licensee) dated October 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 218, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days within issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 29, 2002

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 212
License No. DPR-41

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (the licensee) dated October 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-41 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 212, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- (C) This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 29, 2002

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 218 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 212 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

Remove pages

6-17

6-18

Insert pages

6-17

6-18

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 218 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 212 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated October 17, 2001, Florida Power and Light Company (the licensee), requested a change to the Technical Specifications (TS) for Turkey Point Plant, Units 3 and 4, which would allow a one-time change in its containment integrated leakage rate test interval from the required 10 years to a test interval of 15 years.

2.0 BACKGROUND

Turkey Point Units 3 and 4 are Westinghouse pressurized-water reactors with a large, shallow-dome, prestressed concrete containment structure. The containment pressure boundary consists of the steel containment liner, containment access penetrations, and process piping and electrical penetrations. Title 10 of the *Code of Federal Regulations* (10 CFR), Appendix J, Option B, requires tests to be performed to verify the essentially leak-tight characteristics of the containment structure at the design basis accident pressure. The overall integrity of the containment structure is verified through a Type A integrated leakage rate test. The integrity of the penetrations is verified through Type B and Type C local leak rate tests.

Appendix J, Option B, of 10 CFR 50, requires that Type A tests be conducted at a periodic interval based on historical performance of the overall containment system. Turkey Point TS 6.8.4.h requires that a program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. It further requires that this program shall be in accordance with the guidelines contained in Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by exceptions set forth in the TS. This regulatory guide endorses, with certain exceptions, Nuclear Energy Institute document NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J," dated July 26, 1995.

A Type A test is an overall (integrated) leakage rate test of the containment structure. NEI 94-01 specifies an initial test interval of 48 months for the Type A test, but allows an extended interval of 10 years, based upon two consecutive successful tests. There is also a provision for extending the test interval an additional 15 months in certain circumstances. The two most recent Type A tests at both Turkey Point 3 and 4 have been successful, so its current interval requirement is 10 years.

The licensee is requesting an addition to TS 6.8.4.h, "Containment Leakage Rate Testing Program," which would indicate that they are allowed to take an exception to the guidelines of RG 1.163 regarding the Type A test interval. Specifically, the proposed change to TS 6.8.4.h would require a Type A testing frequency in accordance with NEI 94-01, Revision 0, Section 9.2.3, except that for Unit 3, the first Type A test performed after the November 1992 Type A test shall be performed no later than November 2007, and for Unit 4, the first Type A test performed after October 1991 shall be performed no later than October 2006. This would make the interval 15 years between tests.

Because the leakage rate testing requirements of 10 CFR 50, Appendix J, Option B, and the containment inservice inspection (ISI) requirements mandated by 10 CFR 50.55a complement each other in ensuring the leak-tightness and structural integrity of the containment, the licensee's submittal provided information related to the ISI of the containment and potential areas of weaknesses in the containment that may not be apparent in the risk assessment. The licensee also provided information to explicitly address five general concerns raised during the U.S. Nuclear Regulatory Commission (NRC) staff's review of a previous request to extend the test interval at a plant of similar design.

3.0 EVALUATION

In its October 17, 2001, submittal, the licensee performed a risk impact assessment of extending the Type A test interval to 15 years. The licensee considered the guidelines of NEI 94-01, the methodology used in Electric Power Research Institute document EPRI TR-104285, "Risk Impact Assessment of Revised Containment Leak Rate Testing," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

The basis for the current 10-year test interval is provided in Section 11.0 of NEI 94-01, Revision 0, and was established in 1995 during development of the performance-based Option B to Appendix J. Section 11.0 of NEI 94-01 states that NUREG-1493, "Performance-Based Containment Leak-Test Program," September 1995, provided the technical basis to support rulemaking to revise leakage rate testing requirements contained in Option B to Appendix J. The basis consisted of qualitative and quantitative assessments of the risk impact (in terms of increased public dose) associated with a range of extended leakage rate test intervals. To supplement the NRC's rulemaking basis, NEI undertook a similar study. The results of that study are documented in EPRI Research Project Report TR-104285.

The EPRI study used an analytical approach similar to that presented in NUREG-1493 for evaluating the incremental risk associated with increasing the interval for Type A tests. The EPRI study estimated that relaxing the test frequency from 3 in 10 years to 1 in 10 years, will increase the average time that a leak detectable only by a Type A test goes undetected from 18 to 60 months. Since Type A tests only detect about 3 percent of leaks (the rest are identified during local leak rate tests based on industry leakage rate data gathered from 1987 to 1993), this results in a 10 percent increase in the overall probability of leakage. The risk contribution of pre-existing leakage, in percent of person-rem/year, for the representative pressurized water reactor plant was estimated to increase from .032 percent to .035 percent. This confirmed the NUREG-1493 conclusion that a reduction in the frequency of Type A tests from 3 per 10 years to 1 per 10 years leads to an "imperceptible" increase in risk.

Building upon the methodology of the EPRI study, the licensee assessed the change in the predicted person-rem/year frequency. The licensee quantified the leakage from sequences that have the potential to result in large releases if a pre-existing leak were present. Since the Option B rulemaking in 1995, the NRC staff has issued RG 1.174 on the use of probabilistic risk assessment in risk-informed changes to a plant's licensing basis. The licensee has proposed using RG 1.174 to assess the acceptability of extending the Type A test interval beyond that established during the Option B rulemaking. RG 1.174 defines very small changes in the risk-acceptance guidelines as increases in core damage frequency (CDF) less than 10^{-6} per reactor year and increases in large early release frequency (LERF) less than 10^{-7} per reactor year. Since the Type A test does not impact CDF the relevant criterion is the change in LERF which the licensee estimated. The licensee has estimated the change in LERF for the proposed change and the cumulative change from the original 3 in 10 year interval. RG 1.174 also discusses defense-in-depth and encourages the use of risk analysis techniques to help ensure and show that key principles, such as the defense-in-depth philosophy, are met. The licensee has provided information for estimating the change in the conditional containment failure probability to demonstrate that the defense-in-depth philosophy is met.

The licensee provided an analysis which estimated all of these risk metrics and whose methodology is consistent with previously approved submittals. The following conclusions can be drawn from the analysis associated with extending the Type A test frequency:

1. A slight increase in risk is predicted when compared to that estimated from current requirements. Given the change from a 10 year test interval to a 15 year test interval, the increase in the total integrated plant risk is estimated to be 0.05 percent. The increase in the total integrated plant risk, given the change from a 3 in 10 year test interval to a 15 year test interval, was 0.05 percent. This is reasonable when compared to the range of risk increase, 0.02 to 0.14 percent, estimated in NUREG-1493 when going from a 3 in 10 year test interval to a 10 year interval. NUREG-1493 concluded that a reduction in the frequency of tests from 3 per 10 years to 1 per 10 years leads to an "imperceptible" increase in risk. Therefore, the increase in the total integrated plant risk for the proposed change is considered small and supportive of the proposed change.
2. RG 1.174 provides guidance for determining the risk impact of plant-specific changes to the licensing basis. RG 1.174 defines very small changes in the risk-acceptance guidelines as increases in CDF less than 10^{-6} per reactor year and increases in LERF less than 10^{-7} per reactor year. Since the Type A test does not impact CDF, the relevant criterion is LERF. The increase in LERF resulting from a change in the Type A test interval from 1 in 10 years to 1 in 15 years is estimated to be 1.0×10^{-8} /year. The increase in LERF resulting from a change in the Type A test interval from the original 3 in 10 years to 1 in 15 years is estimated to be 3.0×10^{-8} /year. Increasing the Type A interval to 15 years is considered to be a very small change in LERF.
3. RG 1.174 also encourages the use of risk analysis techniques to help ensure and show that the proposed change is consistent with the defense-in-depth philosophy. Consistency with the defense-in-depth philosophy is maintained if a reasonable balance is preserved among prevention of core damage, prevention of containment failure, and consequence mitigation. The change in the conditional containment failure probability was estimated to increase by 0.0009 for the proposed change and 0.0029 for the

cumulative change of going from a test interval of 3 in 10 years to 1 in 15 years. The NRC staff finds that the defense-in-depth philosophy is maintained based on the very small change in the conditional containment failure probability for the proposed change.

The staff recognizes the limitations of a conditional containment failure probability approach. For plants, such as Turkey Point, with core damage frequency estimates well below 10^{-4} , the ability of the containment to withstand events of even lower probability becomes less clear. Therefore, it is important to consider other risk metrics in conjunction with the conditional containment failure probability, such as total LERF. The licensee has sufficiently demonstrated that the total LERF is less than 10^{-5} for the purpose of this evaluation.

The staff finds that the above conclusions indicate that the increase in predicted risk due to the proposed change is within the acceptance criteria while maintaining the defense-in-depth philosophy of RG 1.174.

The staff also evaluated the licensee's actions taken to address aging degradation of the containment pressure boundary as it relates to the proposed one-time TS amendment of extending the time interval for performing the containment Type A tests from the currently required 10 years to 15 years. In Attachment 4 to its submittal, the licensee addressed five questions, which reflect general concerns raised by the staff during review of a previous submittal for a similar plant. The licensee stated that the ISI, including areas of augmented inspections, of steel liner and penetrations performed at Turkey Point 3 and 4 was based on its Containment Building Liner Inservice Inspection Program which was finalized, in accordance with ASME Section XI, Subsection IWE, 1992 Edition with 1992 Addenda, in December 1999. Any conditions found to be unacceptable were reported and dispositioned in accordance with the plant's corrective action program to assure the containment structural integrity and leak-tight integrity. The licensee also conducted the ISI on the concrete portion of the containment based on the requirements documented in TS Section 3.6.1.6, "Containment Structural Integrity," which was developed in accordance with ASME Code, Section XI, Subsection IWL. The ISI on the concrete portion of the containment includes tendon surveillance activities, exterior concrete surface examinations, and the repair and replacement provisions of Subsection IWL. Based on the results of the inspections and the maintenance performed, the licensee concluded that the containment structures are in excellent condition and will perform well within their structural design parameters.

Regarding the ISI of seals, gaskets, and pressure retaining bolted connections, the licensee stated that with the NRC-approved relief requests, the seals and gaskets of bolted penetrations are examined by a Type B or Type C local leak-rate test prior to any maintenance that could affect containment integrity. Prior to assembly, the seals and gaskets are examined, and if necessary replaced. After the re-assembly, an as-left test is performed to ensure that the penetration leakage meets the administrative limits. Plant procedures establish the maximum frequency based on acceptable performance as once every 60 months. For pressure retaining bolting, examinations are performed in accordance with Table IWE-2500-1, Examination Category E-G, Item E8.10. Bolted connections shall meet the pressure test requirements of Table IWE-2500-1, Examination Category E-P, Item E9.40. Because the extension requested for Type A testing frequency will not affect the examination frequency for penetrations, and the Type B testing frequency for all penetrations meets the guidelines of NEI 94-01 and RG 1.163, the staff finds that the licensee's ISI program provides reasonable assurance that the integrity

of the containment pressure boundary will be maintained during the period of the Type A test extension.

As for the integrity of stainless-steel bellows, the licensee stated that Turkey Point 3 and 4 do not have containment penetration bellows. Therefore, this concern does not apply to Turkey Point 3 and 4.

Because Type A tests help to identify areas of through-wall degradations when the containment vessel is pressurized, the NRC staff had a concern regarding how the potential leakages due to age-related degradation in the uninspectable areas (areas that cannot be visually examined) were considered in risk assessment of the extended test interval. With respect to this concern, the licensee stated that the potential for containment leakage was explicitly included in the risk assessment. By definition, the intact containment case, EPRI Containment Failure Class 1, includes a leakage term that is independent of the source of the leak. The assessment also includes specific containment failure classes due to extending the test interval (Classes 3a and 3b). These cases include the potential that the leakage is caused by a liner failure. The assessment shows that even with the increased potential to have an undetected containment flaw or leak path, the increase in risk is small.

Based on the justification provided in the TS change request and the information provided to address the five general questions, the staff finds that (1) the structural integrity of the containment vessel is verified through the periodic inservice inspections conducted as required by Subsections IWE and IWL of the ASME Code, Section XI, (2) the integrity of the penetrations and containment isolation valves are periodically verified through Type B and Type C tests as required by 10 CFR Part 50, Appendix J and Turkey Point 3 and 4 TS, and (3) the potential for large leakage from the areas that cannot be examined by the ISI has been explicitly modeled in performing the risk assessment. In addition, the system pressure tests for the containment pressure boundary (i.e., Appendix J tests, as applicable) are required to be performed following repair and replacement activities in accordance with Article IWE-5000 of the ASME Code, Section XI. Serious degradation of the primary containment pressure boundary is required to be reported under 10 CFR 50.72 and 10 CFR 50.73.

Based on the foregoing evaluation, the staff finds that the proposed one-time extension of performing the Type A testing is acceptable, and the interval until the next Type A tests at Turkey Point Units 3 and 4 may be extended to 15 years. Therefore, the proposed changes to TS 6.8.4.h are acceptable.

4.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. Nuclear Regulatory Commission, the State of Florida does not desire notification of issuance of license amendments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (66 FR 59507). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Michael Snodderly, NRR
James Pulsipher, NRR
Thomas Cheng, NRR

Date: January 29, 2002

Mr. J. A. Stall
Florida Power and Light Company

TURKEY POINT PLANT

cc:

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

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Mr. John P. McElwain, Site Vice President
Turkey Point Nuclear Plant
Florida Power and Light Company
9760 SW. 344th Street
Florida City, FL 33035

T. O. Jones, Plant General Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
9760 SW. 344th Street
Florida City, FL 33035

County Manager
Miami-Dade County
111 NW 1 Street, 29th Floor
Miami, Florida 33128

Ms. Olga Hanek
Acting Licensing Manager
Turkey Point Nuclear Plant
9760 SW 344th Street
Florida City, FL 33035

Senior Resident Inspector
Turkey Point Nuclear Plant
U.S. Nuclear Regulatory Commission
9762 SW. 344th Street
Florida City, Florida 33035

Mr. Don Mothena
Manager, Nuclear Plant Support Services
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. William A. Passetti, Chief
Department of Health
Bureau of Radiation Control
2020 Capital Circle, SE, Bin #C21
Tallahassee, Florida 32399-1741

Mr. Rajiv S. Kundalkar
Vice President - Nuclear Engineering
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. Craig Fugate, Director
Division of Emergency Preparedness
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100