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MAY 06 2009

L-2009-110
10 CFR 50.36

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Wastewater Permit Number FL0001562
Request for Minor Revision Notification

In accordance with Section 3.2.3 of the Turkey Point Units 3 and 4 Environmental Protection Plan (Appendix B of Facility Operating Licenses DPR-31 and DPR-41), enclosed is a copy of the request to revise Wastewater Permit Number FL0001562.

A minor revision to the Turkey Point Wastewater Permit is requested to address the construction and operation of a Dry Used Fuel Storage Facility at the Turkey Point Nuclear Plant.

Should there be any questions, please contact us.

Very truly yours,

William Jefferson, Jr.
Vice President
Turkey Point Nuclear Plant

Enclosure

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

COO1
NRR

ENCLOSURE TO

L-2009-110



FPL

Nuclear Division

COPY

NP-ISFSI-09-762

April 30, 2009

Marc Harris, P.E.
Supervisor, Power Plant NPDES Permitting
Industrial Wastewater Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 3545
Tallahassee, Florida 32399-2400

**RE: FPL – Turkey Point Plant
State IWW Permit No. FL0001562
Request for Minor Revision – Construction and Operation of Dry Used Fuel Storage
Facility**

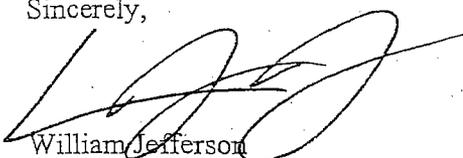
Dear Mr. Harris:

Attached please find the following items to support the request for a minor revision to the Florida Power & Light Company (FPL) Turkey Point Plant State IWW Permit No. FL0001562:

- 1) Four (4) signed, sealed copies of FDEP Form 62-620.910(9), "Application for a Minor Revision to a Wastewater facility of Activity Permit" including Attachment 1 which explains the details of the dry fuel storage facility and the impact of the facility on the IWW treatment facility
- 2) Attachment 2 – A copy of the April 3, 2009 FPL letter to the DEP Siting Coordination Office requesting approval of this Post Certification Amendment to the Power Plant Site Certification to include the Dry Used Fuel Storage Facility
- 3) An FPL Check payable to the Florida Department of Environmental Protection for the \$250 application fee.

If you have any questions or need additional information on this matter, please contact Ron Hix at (561) 691-7641.

Sincerely,


William Jefferson
Site Vice President – Turkey Point Nuclear Plant

Enclosures

cc:

FDEP – Tallahassee - Siting Office – Mike Halpin
USNRC Document Control Desk
FDEP – SE District – Tim Powell



APPLICATION FOR A MINOR REVISION TO A WASTEWATER FACILITY OR ACTIVITY PERMIT

1. Instructions

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- Each applicable item must be completed in full in order to avoid delay in processing of this form. Where attached sheets or other technical documentation are provided, indicate appropriate cross-references.
- Three (3) copies of this application with supporting documentation shall be submitted with this form.
- All information is to be typed or printed in ink. Dates are to be entered in MM/DD/YR format.
- This application and attachments shall be signed in accordance with Rule 62-620.305, F.A.C. Also, as applicable, this application and all attachments shall be signed and sealed by a professional engineer registered in Florida in accordance with Rule 62-620.310, F.A.C.

2. Facility Information

- a. Permit Number: FL0001562 b. Facility Identification Number: _____
- c. Project/Facility Name: Turkey Point Nuclear Power Plant
- d. Contact Name: Ron Hix
- Number and Street: 700 Universe Boulevard
- City/State/Zip Code: Juno Beach, Florida 33408
- Telephone: (561) 691-7641

3. Type of Revision

- Correct Typographical Errors¹** - Submit one copy of each page of the permit showing revisions being requested.
- Change Improvement Schedule¹** - Provide a description of the improvement, a list of the dates to be revised, and a reason for the proposed change in each date.
- Change Expiration Date of Permit¹** - Provide the current and proposed expiration dates for the permit and the reasons for the proposed change.
- Change Staffing Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-699, F.A.C.

¹A processing fee is not required.

²A processing fee is required with the application in accordance with Rule 62-4.050, F.A.C.

- Change Monitoring and Reporting Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-601, F.A.C.
- Modify Approved Pretreatment Program¹** - Describe the proposed modification and provide the information required by Rule 62-625.540, F.A.C.
- Delete Point Source Outfall¹** - Identify the outfall and explain why the outfall is being eliminated.
- Modify or Expand Approved Residuals Land Application Sites²** - Attach a new or updated Agricultural Use or Dedicated Site Plan as required by Chapter 62-640, F.A.C.
- Minor Modification to the Facility²** - Provide a description of the proposed modification. If applicable, attach any reports, plans, and specifications which have been developed to implement this modification.
- Other²** - Provide appropriate documentation. Describe.

4. Certifications

a. Applicant or Authorized Representative

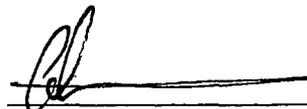
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

(Signature of Applicant or Authorized Representative ³)	(Date)
Name (please type) <u>William Jefferson</u>	Company Name <u>Florida Power & Light</u>
Title <u>Site Vice president</u>	Company Address: <u>9760 S.W. 344 Street</u>
Phone: <u>(305) 246-6113</u>	City/State/Zip Code: <u>Florida City, FL 34428</u>

b. Professional Engineer Registered in Florida

I certify that the engineering features of this project have been (designed) examined by me and found to conform to engineering principles applicable to such projects. In my professional judgement, this facility, when properly constructed, operated, and maintained, will comply with all applicable statutes of the State of Florida and rules of the Department.

Name (please type): Glenn Andrews
 Florida Registration Number: PE No. 65772
 Company Name: Florida Power & Light
 Company Address: 700 Universe Boulevard
 City/State/Zip Code: Juno Beach, FL 33408
 Phone Number: 561-694-3878


4/29/09 #65772
 (Seal, Signature, Date, and Registration Number)

³If signed by the authorized representative, attach a letter of authorization in accordance Rule 62-620.305, F.A.C.

FPL will be constructing a Dry Used Fuel Storage Facility (Facility) at the Turkey Point Nuclear Plant. A request for a "Post Certification Amendment" to address the construction and operation of the Facility was submitted to the FDEP Siting Coordination Office on April 3, 2009 (Attachment 2). This Facility will be similar in form and function to the Facility constructed for the same purpose at the St. Lucie Plant in 2006-07. The most significant difference between the two projects is that the stormwater run-off from the St. Lucie Plant Facility is collected and discharged to the plant's cooling water intake canal, and thus, eventually to the Atlantic Ocean, while stormwater collected during construction and operation from the Turkey Point Facility will be discharged directly to the Turkey Point Industrial Wastewater Treatment facility (closed-loop cooling canal system) which is not and does not discharge to Waters of the State. Per your direction, based on the information included below, we are requesting a minor permit revision for construction and operation of the Facility.

The Facility will be located on plant property, approximately 500 feet to the east of Units 3 and 4. The Facility will be situated on a peninsula of made-land (fill) surrounded by the Intake Canal on the north and west and the return cooling canal on the east.

The main components of the Facility will include: 1) two reinforced concrete pads to support storage of self-contained horizontal storage modules (HSMs); 2) concrete aprons located adjacent to the pads; and 3) a single-story storage building. Additional ancillary structures include an asphalt-paved haul path and security perimeter fencing.

The Facility will be constructed in two phases. Phase I will include construction of the northernmost pad and aprons, the haul path, the storage building, perimeter security fencing and related stormwater drainage structures. Phase II will be constructed as needed, and will consist of expansion of the pad and aprons.

A stormwater drainage analysis and design of the site grading and stormwater collection system for the Facility was completed. The stormwater from the Facility site currently drains to the existing Industrial Wastewater (IWW) treatment facility. The IWW treatment facility is an on-site closed loop, re-circulating cooling and water treatment system. The IWW treatment facility is permitted under FPL's existing National Pollutant Discharge Elimination System (NPDES) Permit No. FL0001562 and is not regulated as Waters of the United States or Waters of the State. After completion, stormwater from the facility will continue to be routed to the IWW treatment facility.

The State IWW/NPDES Permit No. FL0001562 includes in the description of the waste treatment system, "...Stormwater including stormwater associated with industrial activity and stormwater not associated with industrial activity." Stormwater from the Dry Used Fuel Facility would most likely be classified as stormwater not associated with industrial activity as the Facility pad and apron are just expanses of concrete with very little vehicular traffic. There are no raw or hazardous materials that would come in contact with storm water. The used fuel is stored "dry" (i.e. all moisture has been removed) inside of sealed, stainless steel containers that are, in turn, inside of concrete "overpacks" (See figure entitled, "Dry Used Fuel Storage Project" part of Appendix 1). Since discharges of stormwater are currently addressed by Permit No. FL0001562, and only insignificant changes in existing drainage patterns are proposed (see details below) only a minor revision to the permit is necessary to address stormwater discharges from the Facility.

Hydrologic and hydraulic analyses of the proposed Facility area were performed, including:

1. calculation of stormwater runoff flow rates for both the 100-year, 3-day and 25-year, 3-day design storms, for both the existing and proposed (i.e., developed) conditions; (Note: The increase in runoff rate is only two cubic feet per second between the existing and developed conditions after a 25-year storm);
2. calculation of the hydraulic characteristics (i.e., flow rate, trench drain and pipe dimensions, trench drain and pipe slopes, etc.) of the stormwater structures required to convey the run-off from the 25-year design storm;
3. a water quantity volume analysis, involving calculation of the water surface elevation change in the IWW treatment facility resulting from the discharge of stormwater from the Facility during the 100-year storm; and
4. a water quality treatment volume analysis, involving calculation of the capacity of the IWW treatment facility to contain the water quality treatment volume based on the South Florida Water Management District's Environmental Resource Permit Information Manual Volume IV, Basis of Review (BOR), Section 5.2.1 (Reference 10).

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A stormwater drainage system has been designed to convey runoff from the pad and apron to the permitted IWW treatment facility. In addition, grading of embankment slopes and adjacent areas has been designed to sheet flow runoff away from the Facility and into the adjacent permitted IWW treatment facility. The analyses determined that the surface grading and placement of structures can support conveyance and discharge of stormwater run-off from the design storms.

The available storage area of the IWW treatment facility is adequate to support: 1) the increase in runoff volume due to construction of the Facility; and 2) the required water quality treatment volume (i.e. required by SFWMD regulations). The 100-year, 3-day storm results in an incremental increase in water surface elevation of the IWW treatment facility of approximately 0.002 inch. Similarly, the required water quality treatment volume can be contained in the IWW treatment facility, with an increase in water surface elevation of approximately 0.002 inch. The increase in the IWW treatment facility water surface elevation due to contributions by the Facility is, therefore, insignificant.

In summary, the construction and operation of the Facility meets the definition of a "minor modification" per Section 62-620.200 (24) as it is not expected to lead to a substantially different environmental impact and will not involve a substantially different type of wastewater. Furthermore, the characteristics of the effluent (actually there are no discharges to surface water) will not change and the current industrial wastewater treatment facility is more than adequately sized to accept the de minimus amount of additional stormwater resulting from Facility operation. Therefore, based on this information, FPL is requesting a minor revision to State IWW/NPDES Permit No. FL0001561 for the construction and operation of this Facility.

As always, time is of the essence. We are expecting to get a decision from the Siting Coordination Office regarding our request for a Post Site Certification Amendment by May 18, 2009, and, assuming that amendment is approved, we would like to begin construction as soon as possible after that date.



APPLICATION FOR A MINOR REVISION TO A WASTEWATER FACILITY OR ACTIVITY PERMIT

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Attachment 1 to Form 62-620.910 (9)

FPL will be constructing a Dry Used Fuel Storage Facility (Facility) at the Turkey Point Nuclear Plant. A request for a "Post Certification Amendment" to address the construction and operation of the Facility was submitted to the FDEP Siting Coordination Office on April 3, 2009 (Attachment 2). This Facility will be similar in form and function to the Facility constructed for the same purpose at the St. Lucie Plant in 2006-07. The most significant difference between the two projects is that the stormwater run-off from the St. Lucie Plant Facility is collected and discharged to the plant's cooling water intake canal, and thus, eventually to the Atlantic Ocean, while stormwater collected during construction and operation from the Turkey Point Facility will be discharged directly to the Turkey Point Industrial Wastewater Treatment facility (closed-loop cooling canal system) which is not and does not discharge to Waters of the State. Per your direction, based on the information included below, we are requesting a minor permit revision for construction and operation of the Facility.

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3. Type of Revision

- Correct Typographical Errors¹** - Submit one copy of each page of the permit showing revisions being requested.
- Change Improvement Schedule¹** - Provide a description of the improvement, a list of the dates to be revised, and a reason for the proposed change in each date.
- Change Expiration Date of Permit¹** - Provide the current and proposed expiration dates for the permit and the reasons for the proposed change.
- Change Staffing Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-699, F.A.C.

¹A processing fee is not required.

²A processing fee is required with the application in accordance with Rule 62-4.050, F.A.C.

Attachment 1 to Form 62-620.910 (9)

FPL will be constructing a Dry Used Fuel Storage Facility (Facility) at the Turkey Point Nuclear Plant. A request for a "Post Certification Amendment" to address the construction and operation of the Facility was submitted to the FDEP Siting Coordination Office on April 3, 2009 (Attachment 2). This Facility will be similar in form and function to the Facility constructed for the same purpose at the St. Lucie Plant in 2006-07. The most significant difference between the two projects is that the stormwater run-off from the St. Lucie Plant Facility is collected and discharged to the plant's cooling water intake canal, and thus, eventually to the Atlantic Ocean, while stormwater collected during construction and operation from the Turkey Point Facility will be discharged directly to the Turkey Point Industrial Wastewater Treatment facility (closed-loop cooling canal system) which is not and does not discharge to Waters of the State. Per your direction, based on the information included below, we are requesting a minor permit revision for construction and operation of the Facility.

The Facility will be located on plant property, approximately 500 feet to the east of Units 3 and 4. The Facility will be situated on a peninsula of made-land (fill) surrounded by the Intake Canal on the north and west and the return cooling canal on the east.

The main components of the Facility will include: 1) two reinforced concrete pads to support storage of self-contained horizontal storage modules (HSMs); 2) concrete aprons located adjacent to the pads; and 3) a single-story storage building. Additional ancillary structures include an asphalt-paved haul path and security perimeter fencing.

The Facility will be constructed in two phases. Phase I will include construction of the northernmost pad and aprons, the haul path, the storage building, perimeter security fencing and related stormwater drainage structures. Phase II will be constructed as needed, and will consist of expansion of the pad and aprons.

A stormwater drainage analysis and design of the site grading and stormwater collection system for the Facility was completed. The stormwater from the Facility site currently drains to the existing Industrial Wastewater (IWW) treatment facility. The IWW treatment facility is an on-site closed loop, re-circulating cooling and water treatment system. The IWW treatment facility is permitted under FPL's existing National Pollutant Discharge Elimination System (NPDES) Permit No. FL0001562 and is not regulated as Waters of the United States or Waters of the State. After completion, stormwater from the facility will continue to be routed to the IWW treatment facility.

The State IWW/NPDES Permit No. FL0001562 includes in the description of the waste treatment system, "...Stormwater including stormwater associated with industrial activity and stormwater not associated with industrial activity." Stormwater from the Dry Used Fuel Facility would most likely be classified as stormwater not associated with industrial activity as the Facility pad and apron are just expanses of concrete with very little vehicular traffic. There are no raw or hazardous materials that would come in contact with storm water. The used fuel is stored "dry" (i.e. all moisture has been removed) inside of sealed, stainless steel containers that are, in turn, inside of concrete "overpacks" (See figure entitled, "Dry Used Fuel Storage Project" part of Appendix 1). Since discharges of stormwater are currently addressed by Permit No. FL0001562, and only insignificant changes in existing drainage patterns are proposed (see details below) only a minor revision to the permit is necessary to address stormwater discharges from the Facility.

Hydrologic and hydraulic analyses of the proposed Facility area were performed, including:

1. calculation of stormwater runoff flow rates for both the 100-year, 3-day and 25-year, 3-day design storms, for both the existing and proposed (i.e., developed) conditions; (Note: The increase in runoff rate is only two cubic feet per second between the existing and developed conditions after a 25-year storm);
2. calculation of the hydraulic characteristics (i.e., flow rate, trench drain and pipe dimensions, trench drain and pipe slopes, etc.) of the stormwater structures required to convey the run-off from the 25-year design storm;
3. a water quantity volume analysis, involving calculation of the water surface elevation change in the IWW treatment facility resulting from the discharge of stormwater from the Facility during the 100-year storm; and
4. a water quality treatment volume analysis, involving calculation of the capacity of the IWW treatment facility to contain the water quality treatment volume based on the South Florida Water Management District's Environmental Resource Permit Information Manual Volume IV, Basis of Review (BOR), Section 5.2.1 (Reference 10).

A stormwater drainage system has been designed to convey runoff from the pad and apron to the permitted IWW treatment facility. In addition, grading of embankment slopes and adjacent areas has been designed to sheet flow runoff away from the Facility and into the adjacent permitted IWW treatment facility. The analyses determined that the surface grading and placement of structures can support conveyance and discharge of stormwater run-off from the design storms.

The available storage area of the IWW treatment facility is adequate to support: 1) the increase in runoff volume due to construction of the Facility; and 2) the required water quality treatment volume (i.e. required by SFWMD regulations). The 100-year, 3-day storm results in an incremental increase in water surface elevation of the IWW treatment facility of approximately 0.002 inch. Similarly, the required water quality treatment volume can be contained in the IWW treatment facility, with an increase in water surface elevation of approximately 0.002 inch. The increase in the IWW treatment facility water surface elevation due to contributions by the Facility is, therefore, insignificant.

In summary, the construction and operation of the Facility meets the definition of a "minor modification" per Section 62-620.200 (24) as it is not expected to lead to a substantially different environmental impact and will not involve a substantially different type of wastewater. Furthermore, the characteristics of the effluent (actually there are no discharges to surface water) will not change and the current industrial wastewater treatment facility is more than adequately sized to accept the de minimus amount of additional stormwater resulting from Facility operation. Therefore, based on this information, FPL is requesting a minor revision to State IWW/NPDES Permit No. FL0001561 for the construction and operation of this Facility.

As always, time is of the essence. We are expecting to get a decision from the Siting Coordination Office regarding our request for a Post Site Certification Amendment by May 18, 2009, and, assuming that amendment is approved, we would like to begin construction as soon as possible after that date.



April 3, 2009

Mr. Michael Halpin, Administrator
Siting Coordination Office
Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399

Re: Florida Power & Light Company
Turkey Point Units 3 & 4
Power Plant Site Certification No. 03-45A2
Post Certification Amendment

Dear Mr. Halpin:

Pursuant to Section 403.5113, Florida Statutes (F.S.) and Rule 62-17.205, Florida Administrative Code (F.A.C.), please accept this letter and the attachments as a post-certification amendment to Florida Power & Light Company's (FPL) original Site Certification Application (SCA) for the Turkey Point Uprate Project in Miami-Dade County, Florida.

This post-certification amendment to that SCA addresses installation of a dry used fuel storage facility at the FPL Turkey Point Plant. The facility would serve the now-certified Units 3 and 4 which are nuclear-powered electric generating units. These units were certified in 2008 for an increase in the electric generating capacity of each unit.

The requested amendment would add a six-acre parcel near to the certified site for construction and operation of a dry used fuel storage facility. This facility contains a concrete pad, horizontal storage modules, a storage building and security system. The horizontal storage modules enclose and protect the used fuel. These massive reinforced concrete structures meet NRC requirements to store dry used fuel from the Turkey Point Units 3 and 4. The proposed facility will store used fuel from the reactor core to make room for additional used fuel in the existing used fuel pools at the site. The site for the proposed facility is east of and outside of the existing Turkey Point Units 3 and 4 certified boundaries, but is on plant property and within the Industrial Wastewater (IWW) treatment facility. A map showing the planned location of the used fuel storage facility is attached. A photograph generally depicting the proposed dry used fuel storage facility is also attached.

The facility location is on the eastern edge of the cooling water intake canal that serves Units 3 and 4. The facility location is a previously cleared and partially paved area consisting of storage and parking facilities. It is devoid of vegetation except for some upland grasses. The facility location contains very little ecological value due to its existing use and the fact that it consists of

Florida Power & Light Company

700 Universe Blvd

Juno Beach, FL 33408

man-made fill from the original construction of the Turkey Point plant. Site stormwater will continue to be routed to the permitted IWW treatment facility (closed-cooling canal system).

Surface improvements to an existing internal haul road will be required to access the new dry used fuel storage facility. The facility will be elevated above existing grade to 18.3 feet.

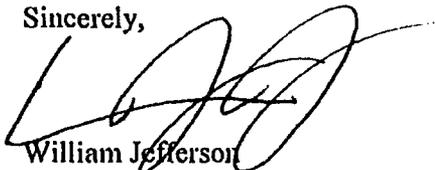
The Project also involves upgrades to the existing crane system that serves existing Units 3 and 4. The upgrades to the crane system are necessary to handle the casks in which the used fuel will be placed for transport by truck to the dry used fuel storage facility. These crane modifications will be entirely within the existing certified site and will not have any effect on ecological or other resources.

Upon review of the existing conditions of certification, the dry used fuel storage facility Project, including the crane improvements, can be undertaken consistent and in compliance with the existing conditions of certification for the Turkey Point Units 3 and 4, including the applicable General and Construction conditions. No changes or additions to the existing conditions of certification are required for FPL to undertake this project. Other than this post-certification amendment, there are no other state, regional or local permits or approvals that would normally be required for this facility, except for possible local building type permits for a non-nuclear storage warehouse, security fencing and associated electrical activities. The attachments identify the Project location and reflect appropriate revisions to the SCA.

This amendment to the SCA is being submitted so that the application will reflect the pertinent aspects of the design of the dry used fuel storage facility. Pursuant to Section 403.5113(1), F.S., FPL requests that your office confirm within 30 days of receipt of this letter that these proposed changes to the Application constitute an amendment to the Application and provide notice of that confirmation to all parties and agencies to this proceeding.

Should you have any questions concerning this matter or require additional information, please contact Stacy Foster at 561-691-7065.

Sincerely,

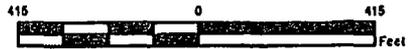
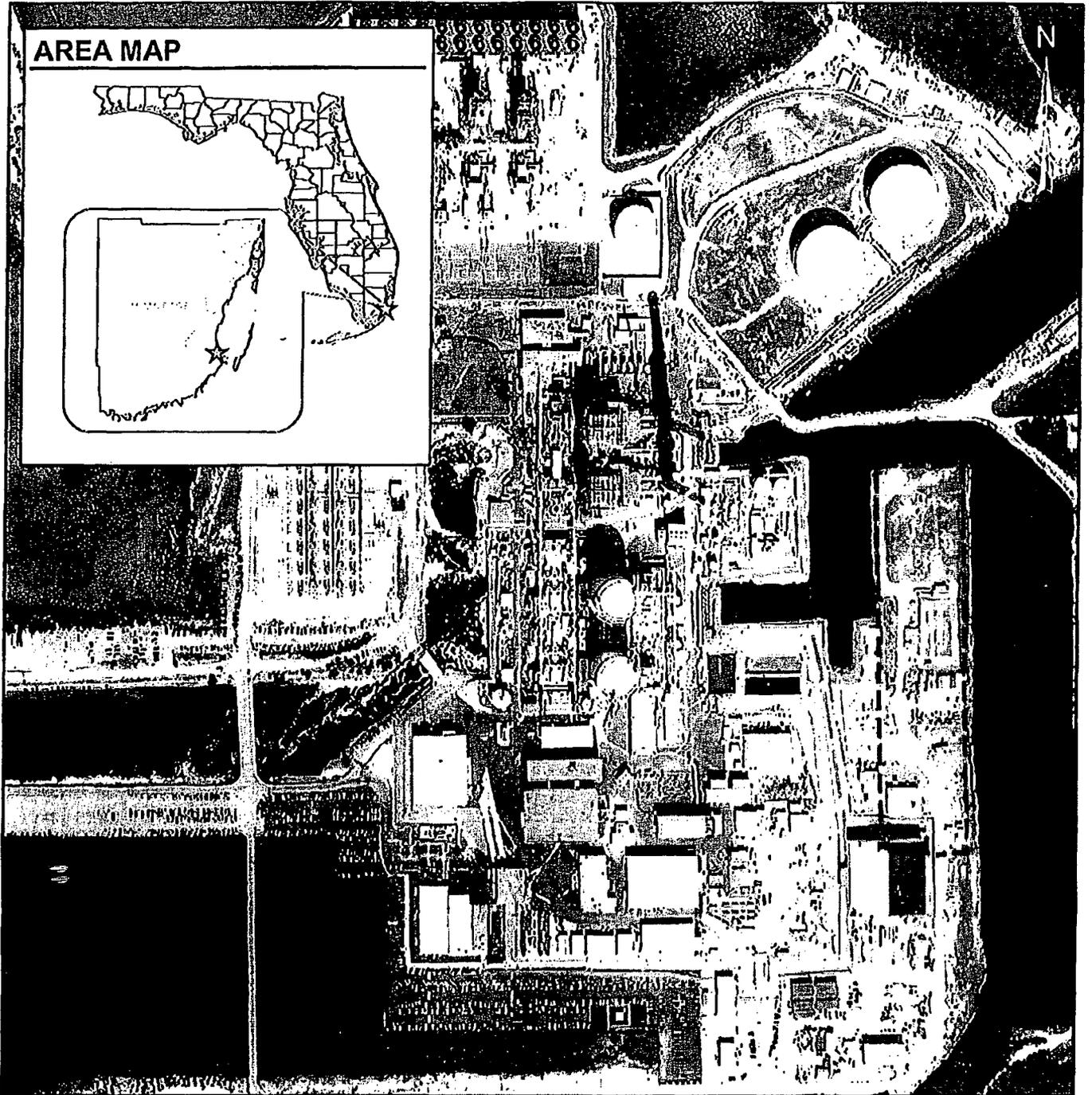
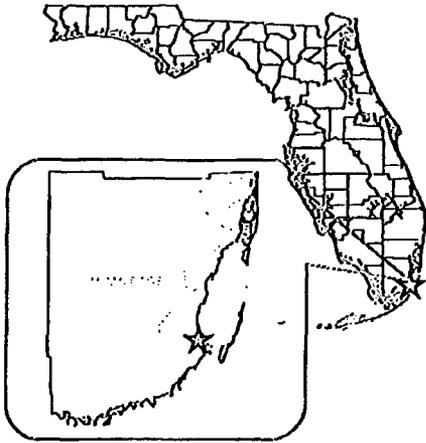


William Jefferson
Vice President
Turkey Point Nuclear Power Plant

Attachments: Figure 1, FPL Turkey Point Dry Used Fuel Storage Project

Cc: Barbara Linkiewicz, FPL
Toni Sturtevant, Esq., DEP
Douglas S. Roberts, Esq., HGS
All Parties, PA03-45A2

AREA MAP



LEGEND

- Project Site
- Turkey Point Units 3 & 4 Certified Boundary

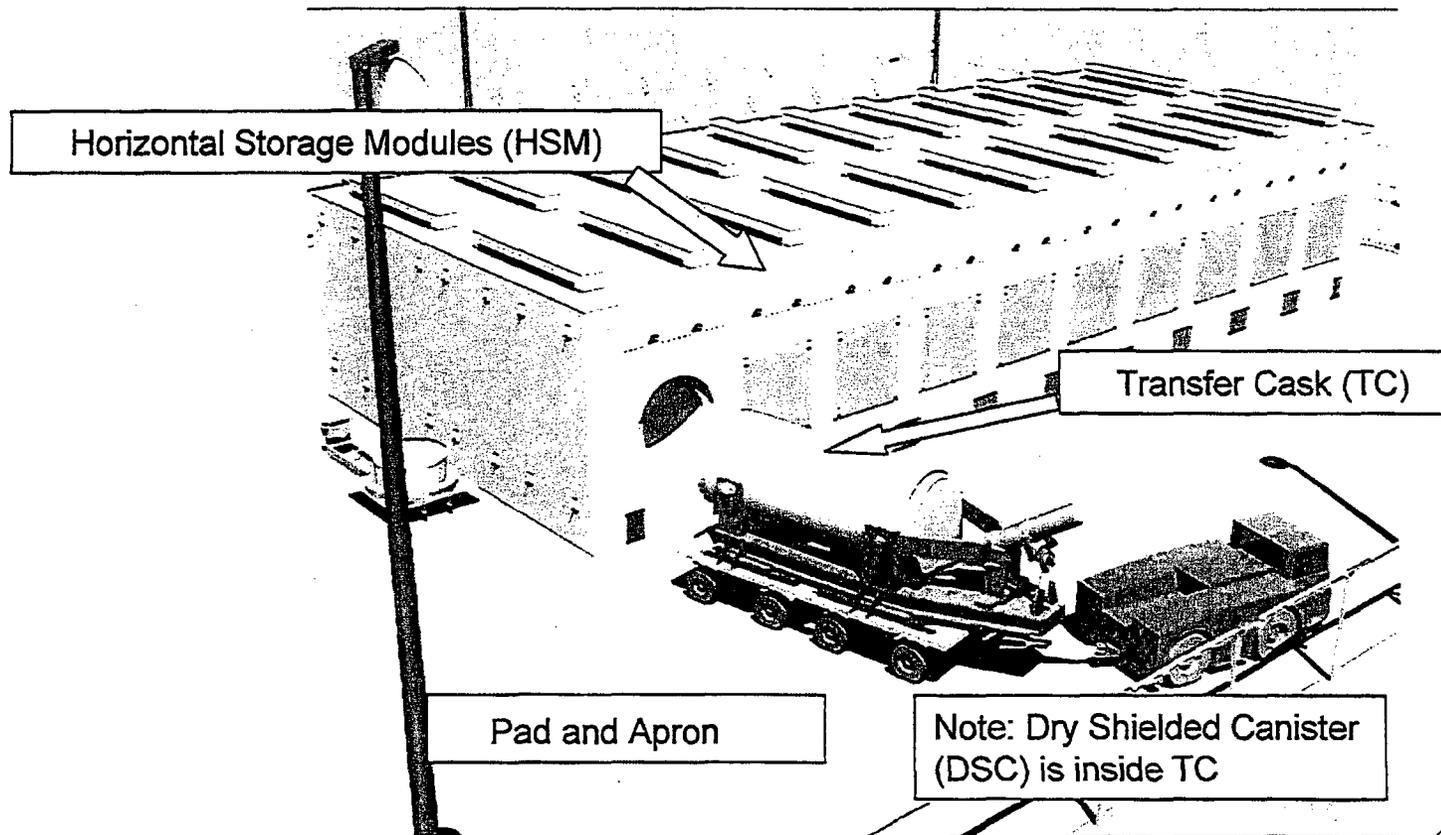
REFERENCES

1. Turkey Point Units 3 & 4 Certified Area, FPL, 2009.

REV.	DATE	DES.	REVISION DESCRIPTION	GIS	CHK	RVW	
PROJECT							
FPL TURKEY POINT DRY USED FUEL STORAGE PROJECT							
TITLE							
TURKEY POINT UNITS 3 & 4							
		PROJECT No.	093-85324	FILE No.	09389324A001		
		DESIGN	KFK	3/3/2009	SCALE: AS SHOWN	REV. 0	
		GIS	NRL	3/18/2009	FIGURE 1		
		CHECK	KJK	3/24/2009			
		REVIEW	JXX	8/13/2009			

Dry Used Fuel Storage Project

Dry Used Fuel Storage System Components





FPL.

POWERING TODAY.
EMPOWERING TOMORROW.®

MAY 06 2009

L-2009-109
10 CFR 50.36

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Industrial Wastewater Permit Number FL0001562
Minor Modification Approval Notification

By letter L-2008-140, dated June 20, 2008, Florida Power & Light (FPL) notified the NRC of a request for a minor modification to Industrial Wastewater Permit Number FL0001562. The minor revision was requested to change the currently approved GE chemicals utilized for process water treatment in Units 1, 2 and 5 plant operations, to equivalent Nalco products. Additionally, FPL requested approval for the use of PT-7000 monoethanolamine (MEA) as an alternative to 19% Ammonia in the Unit 5 Heat Recovery Steam Generators only.

On April 15, 2009, the Florida Department of Environmental Protection issued the minor revision (revision C) to the Industrial Wastewater Permit Number FL0001562 authorizing the use of the requested specialty chemicals. In accordance with Section 3.2.2 of the Turkey Point Units 3 and 4 Environmental Protection Plan (Appendix B of Facility Operating Licenses DPR-31 and DPR-41), enclosed is a copy of the revised Industrial Wastewater Permit Number FL0001562.

Should there be any questions, please contact us.

Very truly yours,

William Jefferson, Jr.
Vice President
Turkey Point Nuclear Plant

Enclosure

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

ENCLOSURE TO

L-2009-109



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 15, 2009

BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Jefferson
Vice President, Turkey Point Plant
Florida Power & Light Company
9760 S.W. 344 Street
Florida City, Florida 33035

RE: Florida Power & Light Company
Turkey Point Power Plant, Dade County
DEP File FL0001562-009-IWB/MR.
Minor Permit Revision For Use of Equivalent Chemical Products

Dear Mr. Jefferson:

On June 20, 2008, the Department received a minor permit revision application for Florida Power & Light Company (FPL) Turkey Point Plant. The minor revision authorizes the use of the requested specialty chemicals at the doses and frequencies specified in the application and supplemental information. The Department has determined that this activity qualifies as a minor modification of the operations at the Turkey Point Power Plant pursuant to Rule 62-620.200(24), Florida Administrative Code (F.A.C.), and can be authorized by a minor permit revision pursuant to Rule 62-620.325(2), F.A.C. This letter and attachment constitute a minor revision to the referenced wastewater permit.

This letter and attachment shall be attached to Permit FL0001562. All other conditions of this permit shall remain in effect. The permit is modified as stated in the attached revised permit pages unless FPL decides to file a timely, sufficient petition for an administrative hearing under Section 120.57, Florida Statutes. The procedures for petitioning for a hearing are set forth in the attachment titled "Notice of Rights." If you have any questions regarding this permit revision, please contact Marc Harris, P.E., in the Industrial Wastewater Section at (850) 245-8589.

Sincerely,

Janet G. Llewellyn
Director
Division of Water Resource Management

JGL/wrf/mh
Attachments

cc: Tim Powell, P.E., DEP West Palm Beach
Nancy Ross, DEP Tallahassee
Andy Flajole, Florida Power and Light

NOTICE OF RIGHTS

A person whose substantial interests are affected by this permit revision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 14 days of receipt of this Permit. A petitioner, other than the applicant, shall mail a copy of the petition to the applicant at the address indicated in the attached letter at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any; the Department case identification number and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Department action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A statement of facts that the petitioner contends warrant reversal or modification of the Department action;
- (f) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

**STATE OF FLORIDA
INDUSTRIAL WASTEWATER FACILITY PERMIT**

PERMITTEE:

Florida Power & Light Company
9760 S.W. 344 Street
Florida City, FL 33035

PERMIT NUMBER:

FL0001562 (Major)

PA FILE NUMBER:

FL0001562-004-IW1N (Revision C)

ISSUANCE DATE:

May 6, 2005

REVISION DATE:

April 15, 2009

EXPIRATION DATE:

May 5, 2010

RESPONSIBLE AUTHORITY:

Mr. Terry O. Jones
Vice President

FACILITY:

FPL Turkey Point Power Plant
9760 S.W. 344 Street
Florida City, FL 33035
Dade County

Latitude: See Note Below Longitude: See Note Below

Note: Latitude and longitude are not shown at Permittee's request, for purposes of Homeland Security pursuant to federal regulations found at 18 CFR 388.113(c)(i) and (ii) and by Presidential Directive dated December 17, 2003.

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and applicable rules of the Florida Administrative Code (F.A.C.), and constitutes authorization to discharge to waters of the state under the National Pollutant Discharge Elimination System (NPDES). The above named permittee is hereby authorized to operate the facilities shown on the application and other *in accordance with the* documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

The facility consists of four steam-electric generating units: Two fossil fuel oil-fired units (Units 1&2) and two nuclear units (Units 3&4). Units 1&2 each have a continuous generating capability of 404 megawatts (MW), and Units 3&4 each have a continuous generating capability of 693 MW.

WASTEWATER TREATMENT:

Wastewater from the Turkey Point facility consists of a non-contact once-through condenser cooling water (OTCW), auxiliary equipment cooling water (AECW), low-volume waste (LVW), and stormwater. LVW consists of chemical treatment system wastewater, boiler blowdown, reverse osmosis concentrate, condensate polishing system backwash water, and other process wastestreams. Stormwater includes stormwater associated with industrial activity and stormwater not associated with industrial activity.

OTCW and AECW discharge to the facility's approximately 6,700 acre onsite closed loop cooling canal system. LVW, equipment area stormwater, and non-equipment area stormwater/drainage discharge either directly to the onsite closed loop cooling canal system or indirectly to the same system via solids settling basins and/or neutralization basin. The cooling canal system is not lined, and therefore, discharges to Class G-III groundwater. The cooling canal system does not discharge to surface waters of the state.

PERMITTEE:
 Florida Power & Light Company
 9760 S.W. 344 Street
 Florida City, FL 33035

PERMIT NUMBER: FL0001562 Major Revision C
 Issuance date: May 6, 2005
 Expiration date: May 5, 2010

Additions to the permit are identified by *italics* and underline.

with the frequencies specified by the REPORT type (i.e., monthly, toxicity, quarterly, semiannual, annual, etc.) indicated on the DMR forms attached to this permit. Monitoring results for each monitoring period shall be submitted in accordance with the associated DMR due dates below.

REPORT Type on DMR	Monitoring Period	DMR Due Date
Monthly or Toxicity	first day of month – last day of month	28 th day of following month
Quarterly	January 1 - March 31 April 1 – June 30 July 1 – September 30. October 1 – December 31	April 28 July 28 October 28 January 28
Semiannual	January 1 – June 30 July 1 – December 31	July 28 January 28
Annual	January 1 – December 31	January 28

DMRs shall be submitted for each required monitoring period including months of no discharge.

The permittee shall make copies of the attached DMR form(s) and shall submit the completed DMR form(s) to the Department's Southeast District Office at the address specified in Permit Condition I.E.2.

2. Unless specified otherwise in this permit, all reports and notifications required by this permit, including twenty-four hour notifications, shall be submitted to or reported to the Southeast District Office at the address specified below:

Southeast District Office
 400 North Congress, Suite 200
 West Palm Beach, FL 33401-3303
 Phone Number - (561) 681-6702
3. All reports and other information shall be signed in accordance with requirements of Rule 62-620.305, F.A.C.
4. The permittee shall provide safe access points for obtaining representative samples which are required by this permit.
5. If there is no discharge from the facility on a day scheduled for sampling, the sample shall be collected on the day of the next discharge.
6. Bypasses subject to General Conditions VIII.20 and VIII.22 shall be monitored or estimated daily, or as approved by the Department for flow and other parameters required for the specific outfall that is bypassed. Monitoring results shall be reported to the Department.
7. There shall be no discharge of polychlorinated biphenyl compounds such as those commonly used for transformer fluid.
8. This permit authorizes the use of the following biocides, or their generic equivalents, in various closed cooling water systems without limitations or monitoring; BULAB 6001/6002, BETZ POWERLINE 3610, and NALCO products 3DT-187, 19H, 1336, 1389, 1393, 7338, 7330, 7348, 7357, 7468, 8322, 73286, BT-3000, Eliminox, PT-7000, Y302105, and Y302104. The Permittee shall notify the Department if there is a discharge of any of these products into the closed cycle cooling canal system in other than de-minimus amounts which contain concentrations of active ingredients above the MDLs for those ingredients.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

STATEMENT OF BASIS FOR MINOR PERMIT REVISION FOR
USE OF EQUIVALENT CHEMICAL PRODUCTS

Permit Number: FL0001562
DEP File Number: FL0001562-009-IWB/MR
Designation: Major
Permit Writer: Bala Nori

Application Date: June 20, 2008 (Revision C)

A. Name and Address of Applicant

Florida Power & Light Company
Post Office Box 14000
Juno Beach, Florida 33408

For:

Turkey Point Power Plant
9760 S.W. 344 Street
Florida City, Florida 330355
Dade County

B. Description of Modification

The Department received a minor revision application requesting the use of NALCO Company water treatment products that are equivalent in ingredients to the General Electric (GE) water treatment products already approved for use at the Florida Power & Light (FPL) Company Turkey Point Power Plant.

The GE chemicals approved for use in the closed cooling water canals include AZ8101, MD1406, MD4106, and Corn Shield. FPL has requested to replace these chemicals with NALCO products 7357, 8322, 1336, and 7330. The estimated NALCO chemical dosages are 200 mg/L, 0.25oz/gallon, 50 mg/L, and 50 mg/L, respectively.

The GE chemicals approved for use in the steam generator include Optisperse HP 3102 and HP 9431. FPL has requested to replace these chemicals with to be replaced with NALCO products BT-3000 and Y302105, respectively. The estimated NALCO chemical dosages are 0.2-2.6 mg/L and 0.2-2.6 mg/L, respectively.

The GE chemicals approved for use in the boiler feedwater control include OS 5005 and OS 5007. FPL has requested to replace these chemicals with NALCO products Y30214, PT-7000, 19H and ELIMIN-OX. The estimated NALCO chemical dosages are to maintain pH of 9.0, to maintain pH of 9.0, to maintain residual of 10 ug/L and 10ug/L, respectively.

The GE chemicals approved for use in the cooling tower include AEC 3145, AZ8104, AEC 3145, AZ 8104, OP 8413, CT 1300, and Foamtrol AF2290. FPL has requested to replace these chemicals with NALCO products 1389, 1393, 3DT-187, 73286, 7330, and 7468. The estimated NALCO chemical dosages are 2.7 mg/L, 1 mg/L, 19 mg/L, 4.2 mg/L, and as needed, respectively.

Because FPL Turkey Point is a no discharge facility, the Department's Toxicity Coordinator has indicated that there would no adverse impact to environment by using the aforementioned chemicals at the facility.

This constitutes Revision C (Rev. C) to the permit. All changes to the permit are noted in Rev. C by underline or strike-through where changes have been made for this revision.