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10 CFR 50.90
L-2009-258
November 5, 2009

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

Re: Turkey Point Unit 4
Docket No. 50-251
Issuance of Amendment Regarding Spent Fuel Boraflex Remedy
Supplement 4 to Request for a Change in Implementation Date

References:

1. Letter from Michael Kiley (FPL) to USNRC, "Implementation Date Change for License Amendments 234 and 229," L-2009-200, September 1, 2009.

2. Letter from Michael Kiley (FPL) to USNRC, "Issuance of Amendment Regarding Spent Fuel Boraflex Remedy – Supplement 3 to Request for a Change in Implementation Date," L-2009-249, October 31, 2009.

3. Westinghouse Nuclear Safety Advisory Letter NSAL-00-015, Axial Burnup Shape Reactivity Bias, November 2, 2000.

Florida Power and Light Company (FPL) submitted an application for amendment of the Unit 3 and 4 licenses in Reference 1. The application was supplemented by FPL for Unit 4 in Reference 2. This letter provides additional information regarding Unit 4 in response to an NRC staff request, via email, regarding the implementation date change requested for Unit 4 License Amendment No. 229 in Reference 1. The NRC request for additional information and the FPL response is provided below.

NRC Question 1

At the end of the Westinghouse NSAL-00-015, the document states, "The affected plants received a plant-specific margin summary (rack up) as an attachment with the transmittal of this NSAL." Provide this attachment that was prepared for Turkey Point.

FPL Response 1

The Westinghouse summary rack-up for Turkey Point is provided below. However, the plant-specific attachment transmitted with NSAL-00-015 (Reference 3) is Westinghouse proprietary

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information. FPL can provide the attachment, if needed by the NRC staff, upon receipt of an affidavit from Westinghouse, which has been requested by FPL.

Westinghouse Margin Rack-up for NSAL-00-015

Credit	**Reactivity (Δk)**
Discrete Lattice Single Rack Cell Assumption Credit	0.00500
Presence Of Samarium And Fission Product Buildup Credit	0.00200
Boron Letdown Curve For Full Power Depletion Credit	0.00516
Enrichment, Density, Dishing Tolerance Credit	0.00466
Existing Delta to the K_{eff} Limit	0.00081
Grid and Sleeve Credit	0
Pool Leakage Credit	0
Decay Time Credit	0
WCAP-14416 Axial Burnup Bias Credit	0
Total Credit Applicable to Units 3 and 4	0.01763
Axial Burnup Bias Penalty	-0.01665
Net Balance	**0.00098**

NRC Question 2

In FPL letter, L-2009-249, you state that, "a Turkey Point specific assessment of the impact was performed that concluded crediting some of the conservatisms in the Turkey Point analysis was sufficient to offset the effect of the penalty from the non-conservative application of the axial burnup shape bias." Provide this assessment that credited some of the conservatisms in the Turkey Point analysis.

FPL Response 2

FPL used the Westinghouse Turkey Point specific assessment and made the following adjustments:

- The credit for the "Existing Delta to the K_{eff} Limit" of 0.00081 was removed in order to maintain the licensing basis criticality analysis 95/95 K_{eff} margin to the regulatory limit.

- The credit for "Presence of Samarium and Fission Product Buildup" was conservatively reduced to account for a change to TS 3.9.3 revising the time required for fuel decay time prior to movement from the reactor vessel from 100 hours to 72 hours.

This resulted in the following margin summary (rack up) demonstrating that the conservatisms in the Turkey Point analysis was sufficient to offset the effect of the penalty from the non-conservative application of the axial burnup shape bias.

FPL Margin Rack-up for NSAL-00-015

Credit	**Reactivity (Δk)**
Discrete Lattice Single Rack Cell Assumption	0.00500
Presence Of Samarium And Fission Product Buildup	0.00194
Boron Letdown Curve For Full Power Depletion	0.00516
Enrichment, Density, Dishing Tolerance Credit	0.00466
Total Credit Applicable to Units 3 and 4	0.01676
Axial Burnup Bias Penalty	-0.01665
Net Balance	**0.00011**

FPL has determined that the additional information provided above does not impact the conclusions of the No Significant Hazards Consideration determination in Reference 1.

If you have any questions or require additional information, please contact Robert Tomonto at 305-246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Very truly yours,

11/5/2009

Executed on

Michael Kiley
Vice President – Turkey Point Nuclear Plant

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Nuclear Plant
USNRC Project Manager for Turkey Point
Mr. William Passetti, Florida Department of Health