

**Gallagher, Carol**

**From:** Brown, Alison [Alison.Brown@fpl.com]  
**Sent:** Monday, March 01, 2010 4:01 PM  
**To:** Gallagher, Carol  
**Subject:** Draft Safety Culture Policy Statement: Request for Public Comments (74 FR 57525, November 6, 2009).  
**Attachments:** L-2010-039 - FPL Comments to NRC for Draft Safety Culture Policy Statement 03-01-10.pdf

Letter L-2010-039 is attached: Draft Safety Culture Policy Statement: Request for Public Comments (74 FR 57525, November 6, 2009).

FPL and NextEra Energy endorse the NEI response to the eight questions posed in the FRN. In addition, we support and re-highlight the four key areas addressed in the NEI letter.

Thank you,  
Alison

11/06/09  
74 FR 57525

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 **FPL**  
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 **ZERO TODAY!**

SONSI Review Complete  
Template = ADM-013

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Add = A. Sapotzis  
(GPS)



March 01, 2010  
L-2010-039

Mr. Michael T. Lesar  
Chief, Rulemaking and Directives Branch (RDB)  
Division of Administrative Services  
Office of Administration (Mail Stop: TWB-05-B01M)  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Draft Safety Culture Policy Statement: Request for Public Comments  
(74 FR 57525, November 6, 2009)

Florida Power and Light Company, the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4 (hereafter referred to as FPL) and its FPL Group affiliates, NextEra Energy Seabrook, LLC (NextEra Energy Seabrook) the licensee for Seabrook Station; NextEra Energy Duane Arnold, LLC (NextEra Energy Duane Arnold), the licensee for Duane Arnold Energy Center (DAEC); and NextEra Energy Point Beach, LLC (NextEra Energy Point Beach), the licensee for Point Beach Nuclear Plant, Units 1 and 2 (hereafter referred to collectively as NextEra Energy) hereby submit the following comments on the November 6, 2009 subject Federal Register Notice (FRN).

By letter dated March 1, 2010, the Nuclear Energy Institute (NEI) offered comments regarding the Draft Safety Culture Policy Statement. NEI's comments reflect the outcome of the public peer panel workshop held February 2-4, 2010. FPL and NextEra Energy endorse the NEI response to the eight questions posed in the FRN. In addition, we support and re-highlight the four key areas addressed in the NEI letter. The four general comments are:

- The results of February workshop deserve serious consideration as an alternative to the FRN's definition and characteristics.
- The regulated licensees and certificate holders bear the primary responsibility for developing and maintaining a strong nuclear safety culture.
- It is critical that a common language of safety culture traits and behaviors exist between the NRC and each of its unique regulated entities.
- The inclusion of security in the basic definition places undue emphasis on one aspect of safety culture while ignoring equally important areas such as emergency preparedness, occupational and public radiation exposure, quality assurance, etc.

FPL and NextEra Energy appreciate the opportunity to provide comments. Please contact me at (561) 691-2798 if there are questions concerning these comments.

Sincerely yours,

  
Larry Nicholson  
Director of Licensing