



L-2011-078
10 CFR 52.3

March 02, 2011

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

Re: Florida Power & Light Company
Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
Response to NRC Request for Additional Information Letter No. 018 (eRAI 5351)
Standard Review Plan Section: 09.05.01 - Fire Protection Program

Reference:

1. NRC Letter to FPL dated February 04, 2011, Request for Additional Information Letter No. 018 Related to SRP Section 09.05.01 Fire Protection Program for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application

Florida Power & Light Company (FPL) provides, as an attachment to this letter, its response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) 09.05.01-1 provided in the referenced letter. The attachment identifies changes that will be made in a future revision of the Turkey Point Units 6 and 7 Combined License Application (if applicable).

If you have any questions, or need additional information, please contact me at 561-691-7490.

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

Executed on March 02, 2011

Sincerely,

A handwritten signature in black ink, appearing to read 'William Maher', is written over a horizontal line.

William Maher
Senior Licensing Director – New Nuclear Projects

Attachment: FPL Response to NRC RAI No. 09.05.01-1 (eRAI 5351)

cc:

PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO
Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant 3 & 4

D097
K110

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 09.05.01-1 (eRAI 5351)
L-2011-078 Attachment Page 1 of 4

NRC RAI Letter No. PTN-RAI-LTR-018, Dated February 4, 2011

SRP Section: 09.05.01 - Fire Protection Program

Question from Balance of Plant Branch

NRC RAI Number: 09.05.01-1 (e-RAI 5351)

Regulatory Guide (RG) 1.189 Revision 2, "Fire Protection for Nuclear Power Plants," Position 1.6.1, "Fire Protection Staff Training and Qualifications," specifies the requirements for the Fire Protection Engineer.

PTN COL 9.5-3 proposes to establish organization requirements for the Fire Protection Program in Item 3 of Table 9.5-201. Item 3 refers to PTN COL FSAR Section 13.1.2.1.3.9 for the Fire Protection Supervisor. Although the requirements are stated for the Fire Protection Supervisor first, later in the same section reference is made to the requirements for the Fire Protection Engineer.

The staff requests the applicant to revise the FSAR to clarify:

- a) whether the Fire Protection Supervisor and the Fire Protection Engineer are the same individual and will meet Position 1.6.1 of RG 1.189 for experience, training, and education, and
- b) whether the Fire Protection Supervisor/Engineer has experience and training in fire protection and in nuclear plant safety to provide a comprehensive approach in directing the Fire Protection Program in accordance with Position 1.6.1.a of RG 1.189.

FPL RESPONSE:

As stated in PTN COLA, Part 2, FSAR Appendix 1AA, Turkey Point Units 6 and 7 conform to Revision 1 of RG 1.189. In accordance with RG 1.189 Revision 1, Regulatory Position 1.6.1, the Fire Protection Engineer is trained and experienced in fire protection and in nuclear plant safety.

Specifically, the Fire Protection Engineer is qualified in accordance with RG 1.189 Revision 1, Regulatory Position 1.6.1.a. This individual is a graduate of an engineering curriculum of accepted standing and has not less than six years of engineering experience, three of which were in a responsible position in charge of fire protection engineering work.

Pursuant to ANSI/ANS 3.1-1993, Section 4.4, the Fire Protection Supervisor has a baccalaureate in engineering or related science and has not less than four years of

related experience, one of which includes nuclear power plant experience. The Fire Protection Supervisor is not required to be qualified in accordance with Regulatory Guide 1.189 Position 1.6.1.

However, if not qualified in certain aspects of fire protection, then the Fire Protection Engineer and/or the Fire Protection Supervisor may have available personnel who are trained and experienced in fire protection and nuclear plant safety.

FSAR Section 13.1.2.1.3.9 will be amended in a future COLA revision to reference ANSI/ANS 3.1-1993 with respect to the qualifications of the Fire Protection Supervisor.

a) The Fire Protection Supervisor and the Fire Protection Engineer are different individuals. As listed in PTN COL FSAR Section 13.1.2.1.3.9, the Fire Protection Supervisor is in charge of fire protection and the fire protection staff, and the Fire Protection Engineer is responsible for implementation and maintenance of the Fire Protection Program.

FSAR Section 13.1.2.1.3.9 will be amended in a future COLA revision to clarify that the Fire Protection Supervisor and the Fire Protection Engineer are different individuals. For clarification, the responsibilities of the Fire Protection Supervisor and the Fire Protection Engineer will be defined individually.

b) Consistent with the guidance in RG 1.189 Revision 1, Regulatory Position 1.6.1, the Turkey Point Units 6 & 7 Fire Protection Program will be under the direction of an individual who has available staff personnel knowledgeable in both fire protection and nuclear plant safety. In addition, Regulatory Position 1.6.1 states the formulation and assurance of the Fire Protection Program and its implementation should be the responsibility of personnel prepared by training and experience in fire protection and in nuclear plant safety to provide a comprehensive approach in directing the Fire Protection Program for the nuclear power plant. As such, the responsible individual should either be knowledgeable in fire protection and nuclear plant safety or have available staff personnel knowledgeable in fire protection and nuclear plant safety.

FSAR Subsection 13.1.2.1.3.9 will be amended in a future COLA revision to include a requirement for either the Fire Protection Supervisor or the engineer in charge of fire protection, and/or someone available to the engineer in charge of fire protection to have training and experience in fire protection and nuclear plant safety, consistent with the expectations identified in RG 1.189 Revision 1 and/or ANSI/ANS 3.1-1993, as applicable.

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 09.05.01-1 (eRAI 5351)
L-2011-078 Attachment Page 3 of 4

This response is PLANT SPECIFIC.

References:

1. American Nuclear Society, *American National Standard for Selection, Qualification, and Training of Personnel for Nuclear Power Plant*, ANSI/ANS-3.1-1993.
2. Regulatory Guide 1.189, *Fire Protection for Nuclear Power Plants*, Revision 1, March 2007.

ASSOCIATED COLA REVISIONS:

The title of FSAR Section 13.1.2.1.3.9 will be updated in a future revision, as shown below:

13.1.2.1.3.9 Fire Protection Supervisor and Fire Protection Engineer

The first paragraph in FSAR Section 13.1.2.1.3.9 will be updated in a future revision, as shown below:

~~In the engineering and support unit, this position~~ **the fire protection supervisor** is in charge of fire protection and the fire protection staff. ~~Fire protection program implementation and maintenance are the responsibilities of the fire protection engineer for the assigned units.~~ The fire protection supervisor is responsible for:

The last paragraph in FSAR Section 13.1.2.1.3.9 will be updated in a future revision, as shown below:

The fire protection supervisor reports through the program engineering manager to the site vice president, who has ultimate responsibility for the fire protection program. Additionally, the fire protection supervisor works with the operations support superintendent to coordinate activities and program requirements with the operations department. ~~In accordance with RG 1.189, the fire protection engineer is a graduate of an engineering curriculum of accepted standing and has not less than 6 years of engineering experience, 3 of which were in a responsible position in charge of fire protection engineering work.~~ **The fire protection supervisor is qualified in accordance with ANSI/ANS 3.1-1993, Section 4.4. (Reference 201)**

Fire protection program implementation and maintenance are the responsibilities of the fire protection engineer. The fire protection engineer is qualified in accordance with RG 1.189 Revision 1, Regulatory Position 1.6.1.a.

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 09.05.01-1 (eRAI 5351)
L-2011-078 Attachment Page 4 of 4

Both the fire protection supervisor and the fire protection engineer are trained and experienced in fire protection and nuclear plant safety or have available personnel who are trained and experienced in fire protection and nuclear plant safety.

ASSOCIATED ENCLOSURES:

None