



L-2011-086
10 CFR 52.3

March 3, 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. 017 (eRAI 5192)
Standard Review Plan Section 09.05.02 – Communication Systems

Reference:

NRC Letter to FPL dated February 4, 2011, Request for Additional Information Letter No.017 Related to SRP Section 09.05.02 - Communication Systems for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application

Florida Power & Light Company (FPL) provides, as attachments to this letter, its responses to the Nuclear Regulatory Commission's (NRC) requests for additional information (RAI) 09.05.02-1 and 09.05.02-2 provided in the referenced letter. The attachments identify 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 3, 2011

Sincerely,

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

William Maher
Senior Licensing Director – New Nuclear Projects

Attachment 1: FPL Response to NRC RAI No. 09.05.02-1 (eRAI 5192)
Attachment 2: FPL Response to NRC RAI No. 09.05.02-2 (eRAI 5192)

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

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 09.05.02-1 (eRAI 5192)
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NRC RAI Letter No. PTN-RAI-LTR-017

SRP Section: 09.05.02 –Communication Systems

Questions from Instrumentation, Controls and Electrical Engineering 1 (AP1000/EPR Projects)(ICE1)

NRC RAI Number: 09.05.02-1 (e-RAI 5192)

PTN COL FSAR, Rev. 1, Section 9.5.2.2.5 (PTN COL 9.5-9), refers to the PTN Emergency Plan to describe the communications systems and their functions. PTN Emergency Plan, Section F, "Emergency Communications," Subsection 1, "communications/notifications," establishes several communications systems but does not specify the primary and secondary means of communication between the plant (Control Room (CR) and Technical Support Center (TSC)) and state/local governments, federal emergency response organizations, the Emergency Operation Facility (EOF), the Nuclear Regulatory Commission (NRC), the Emergency Operations Centers (EOC), and the field assessment teams.

10 CFR 52.79(a)(21) requires emergency plans to comply with the requirements of 10 CFR 50.47 and 10 CFR Part 50, Appendix E. 10 CFR Part 50, Appendix E(IV)(E)(9)(b)(c) and (d), 10 CFR 50.34(f)(2)(xxv), and 10 CFR 50.47(a)(8) require, in part, means of communications between the plant, the EOF, and the state and county EOCs.

Please identify the primary and secondary means of communications between the plant (CR and TSC) and state/local governments, federal emergency response organizations, the EOF, the NRC, the EOCs, and the field assessment teams, and add this information to the Final Safety Analysis Report (FSAR) and/or the Emergency Plan.

FPL RESPONSE:

As indicated in the Turkey Point Units 6 & 7 Emergency Plan (COLA Part 5, Emergency Plan Part 2, Section F), FPL has established several communication systems that ensure reliable and timely exchange of information necessary to provide effective command and control over any emergency response between:

- (1) the plant and state and county agencies within the EPZs,
- (2) with federal emergency response organizations,
- (3) the plant, the EOF and the state and county EOCs, and
- (4) the emergency response facilities and Field Monitoring Teams.

Emergency Plan Figure F-1 shows the initial notification paths and the organizational titles from the Turkey Point emergency response facilities to federal, state, and county emergency response organizations, and industry support agencies. Figures F-2 and F-3 illustrate the primary and alternate methods of communication with and between the various emergency response organizations, including the NRC communications network.

The text in the Emergency Plan, Section F will be modified in a future revision to identify the state hot ring down telephone as the primary means of communication between the

plant (CR and TSC) and state/local governments, the EOF, and the EOCs. The text will also be modified to identify the secondary means of communication as the PBX telephone system, commercial telephone lines, ESATCOM (satellite communications system), and cellular telephones.

The primary means of communication between the plant and the NRC and federal emergency response organizations is the ENS. The secondary means of communication is the PBX telephone system or commercial telephone lines.

The primary means of communication between the plant, the EOF and the field assessment teams is the 900 megahertz radio system. The secondary means of communication is commercial cellular phones.

This response is PLANT SPECIFIC.

References:

None

ASSOCIATED COLA REVISIONS:

The following changes to the Emergency Plan, Section F will be made in a future COLA revision.

The second and third paragraphs in Section F.1 will be modified as follows:

Figure F-1 shows the initial notification paths and the organizational titles from the Turkey Point emergency response facilities to federal, state, and county emergency response organizations, and industry support agencies. The primary and alternate methods of communication **between FPL emergency response facilities**, and the NRC communications network, are illustrated on Figures F-2 and F-3.

FPL maintains the capability to make initial notifications to the designated offsite agencies on a 24-hour-per-day basis. The offsite notification system state hot ring down telephone provides **primary** communications to state and county warning points and EOCs from each Control Room, TSC, and the EOF. ~~backup~~ **Backup or secondary** methods include commercial telephone lines, ESATCOM (satellite communications system), cellular telephones, and radios. State and county warning points are continuously staffed.

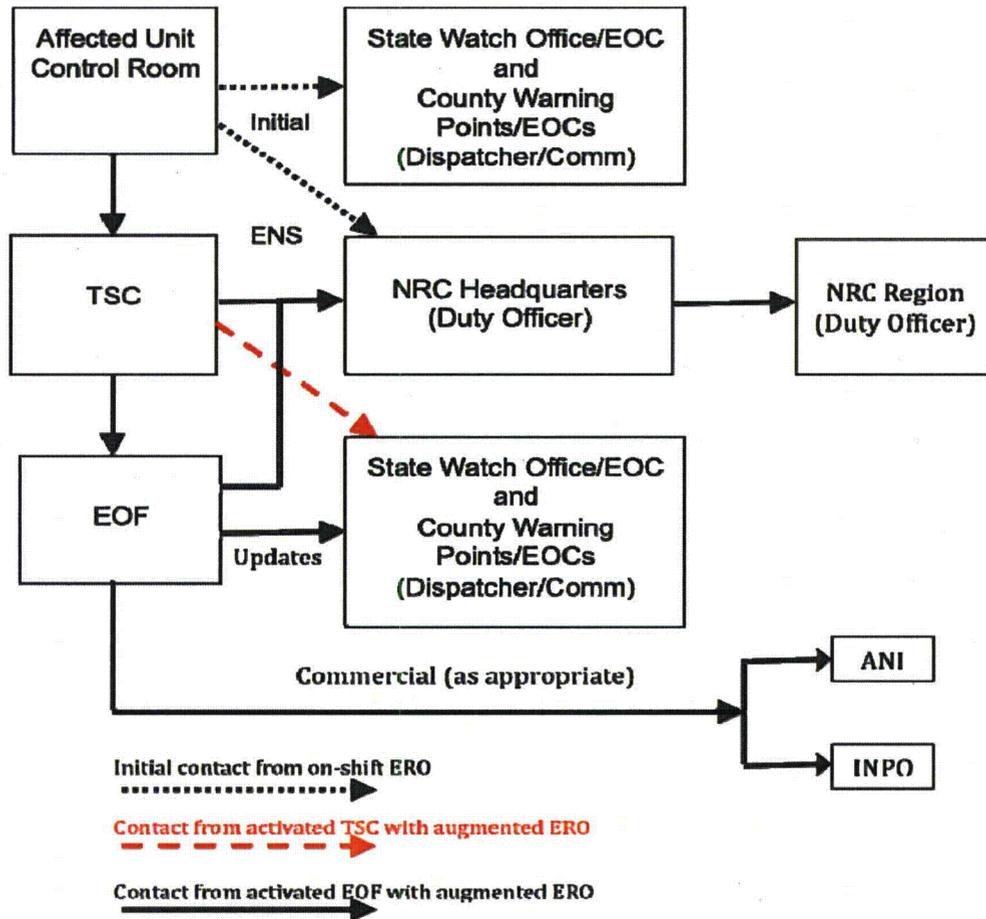
Section F.1, Communications Equipment, Items b, c, e, f, and j will be modified as follows:

- b. Private Branch Exchange (PBX) Telephone System: The PBX telephone system provides communication capability between telephones located in the Turkey Point facilities through direct dialing. The PBX is used to connect the affected unit's Control Room, TSC, OSC, EOF and ENC. The PBX telephone system also provides for outside communications through interconnections with the FPL Intelligent Tandem Network (ITN) corporate telephone communications system and local commercial telephone lines. **This system may be utilized as a secondary communications link to the county governments.** Power to the PBX is provided from non-Class 1E dc and uninterruptible power supply system.

- c. Commercial Telephone System: This system provides standard commercial telephone service which is installed by the local telephone company for normal dial telephone service in the plant. This system includes connections to the PBX and FPL ITN System, dedicated lines to emergency response facilities, and is the primary system for routine communication with areas outside the plant. **This system may be utilized as a secondary communications link to the county governments.** The commercial vendor provides primary and secondary power for their lines.
- e. State Hot Ring Down Telephone: The state hot ring down is a dedicated communications system that has been installed for the purpose of notifying state and county authorities of declared emergencies at Turkey Point. This system links together the Control Rooms, TSC, EOF and state and county government agencies as appropriate **and is the primary means of communication.**
- f. Emergency Satellite Communication System (ESATCOM): The ESATCOM is a satellite communication system that is available in the Control Rooms, TSC, and EOF. This system is an alternate **or secondary** notification system between the plant and state and county government agencies. This system also has links to the National Weather Service and National Hurricane Center for adverse weather advisories.
- j. Satellite Telephones: This satellite system is a portable satellite phone with international calling capabilities. The system is capable of communication with any telephone (public network, cellular, satellite, etc). This system is available to Control Room, TSC, and EOF personnel and provides a backup **or secondary** communication link in the event that the landlines are rendered inoperative.

In addition, Figure F-1 Notification Scheme (after Full Augmentation), will be modified to show the additional communication link to the offsite agencies by the Technical Support Center (TSC) when it is activated at an Alert level emergency and a Site Area Emergency, when it is staffed prior to the Emergency Operations Facility (EOF) activation. When the EOF is activated, all offsite communications are transferred from either the Control Room or the TSC to the EOF.

The revised figure with additions is shown below:



ASSOCIATED ENCLOSURES:

None

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 09.05.02-2 (eRAI 5192)
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NRC RAI Letter No. PTN-RAI-LTR-017

SRP Section: 09.05.02 – Communication Systems

Questions from Instrumentation, Controls and Electrical Engineering 1 (AP1000/EPR Projects)(ICE1)

NRC RAI Number: 09.05.02-2 (e-RAI 5192)

FPL proposes PTN COL 9.5-10 to resolve COL Information Item 9.5-10. In connection with that Information Item, please describe the crisis management radio system and add this description to the FSAR and/or the Emergency Plan.

10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response be provided and maintained. 10 CFR 52.79(a)(2) require that "the description(s) shall be sufficient to permit understanding of the system designs and their relationship to the safety evaluations." AP1000 Design Control Document, Section 9.5.2.5.2 states "The emergency offsite communication system, including the crisis management radio system, will be addressed by the Combined License applicant," which is the basis for COL Information Item 9.5-10.

FPL RESPONSE:

As indicated in the Turkey Point Units 6 & 7 Emergency Plan (COLA Part 5, Emergency Plan Part 2, Section F), FPL has established several communication systems that ensure reliable and timely exchange of information necessary to provide effective command and control over any emergency response between:

- (1) the plant and state and county agencies within the EPZs,
- (2) with federal emergency response organizations,
- (3) the plant, the EOF and the state and county EOCs, and
- (4) the emergency response facilities and Field Monitoring Teams.

Emergency Plan Figure F-1 shows the initial notification paths and the organizational titles from the Turkey Point emergency response facilities to federal, state, and county emergency response organizations, and industry support agencies. Figures F-2 and F-3 illustrate the primary and alternate methods of communication with and between the various emergency response organizations, including the NRC communications network.

The 900 megahertz radio system is discussed in Emergency Plan Part 2 Section F.1 under Communications Equipment and is identified as available to supplement fixed communications in the plant and for Field Monitoring Team communications. This system consists of necessary hardware to allow radio communication between the affected unit Control Room, EOF and mobile units in FPL Vehicles. Commercial cell phones are available as backup to the primary field team communications system.

The text in the Emergency Plan, Section F will be updated in a future revision to clarify that the 900 Megahertz Radio System also provides the ability to be used as a crisis management radio system.

This response is PLANT SPECIFIC.

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 09.05.02-2 (eRAI 5192)
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References:

None

ASSOCIATED COLA REVISIONS:

The following change to the Emergency Plan, Section F will be made in a future COLA revision.

Section F.1, Communications Equipment, Item I will be modified as follows:

- I. 900 Megahertz Radio System: The 900 megahertz radio system is available to supplement fixed communications in the plant and is used for Field Monitoring Team communications. This system consists of necessary hardware to allow radio communication between the affected unit Control Room, EOF and mobile units in FPL vehicles. Commercial cell phones are available as backup to the primary field team communications system. **This radio system also provides the ability to be used as a crisis management radio system.**

ASSOCIATED ENCLOSURES:

None