Florida Power & Light, 9760 S.W. 344 ST. Florida City, FL 33034

FPL.

APR 26 2011
L-2011-128
10 CFR 50.90

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
Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Unit 4 Mechanical/Civil Engineering Issues and Correction to Turkey Point Unit 3 Response Submitted by FPL Letter L-2011-102, Accession No. ML110880060, March 25, 2011

References:

(1) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request No. 205: Extended Power Uprate (EPU)," (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.

(2) Email from J. Paige (NRC) to S. Franzone (FPL), "EMCB Acceptance Review Questions," Accession No. ML103500496, December 16, 2010.

(3) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-004), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Mechanical/Civil Engineering Issues," Accession No. ML110120234, January 7, 2011.

(4) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-102), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Unit 3 Mechanical and Civil Engineering Branch Issues," Accession No. ML110880060, March 25, 2011.

By letter L-2010-113 dated October 21, 2010 [Reference 1], Florida Power and Light Company (FPL) requested to amend Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Units 3 and 4 Technical Specifications (TS). The proposed amendment will increase each unit's licensed core power level from 2300 megawatts thermal (MWt) to 2644 MWt and revise the Renewed Facility Operating Licenses and TS to support their operation at this increased core thermal power level. This represents an approximate increase of 15% and is therefore considered an extended power uprate (EPU).

By email from the U. S. Nuclear Regulatory Commission (NRC) Project Manager (PM) dated December 16, 2010 [Reference 2], additional information regarding mechanical and civil engineering issues was requested by the NRC staff in the Mechanical and Civil Engineering Branch (EMCB) to support their acceptance review of the EPU LAR. The RAI consisted of four (4) questions concerning the proposed piping design modifications and analyses for the Main Feedwater, Main Steam, and Component Cooling Water systems.

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By letter L-2011-004 dated January 7, 2011 [Reference 3], FPL provided responses to four RAI questions. The FPL responses to RAIs 1, 3, and 4 included commitments to complete the associated design and analyses required to support each of the responses for Turkey Point Unit 4 by April 30, 2011. Attachment 1 to this letter satisfies FPL's commitment for Turkey Point Unit 4 by providing revised responses that supersede the responses previously submitted in FPL letter L-2011-004.

By letter L-2011-102 dated March 25, 2011 [Reference 4], FPL provided the revised responses for the Turkey Point Unit 3. Subsequent to the submittal, FPL identified errors in the responses to RAIs 1 and 3. Table 1 of the response to RAI-1 contains incorrect intermediate break criteria for both existing and EPU conditions. As a result of the incorrect break criteria, incorrect ratios were determined. The table is revised to correct these values. RAI-3 is revised to correct an editorial error. The next to the last paragraph stated that Class III includes criteria (allowables) for faulted conditions. This is incorrect. Class III does not include provisions (allowables) for faulted conditions. Attachment 2 provides the corrections for the RAI responses submitted by FPL letter L-2011-102.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee of Florida.

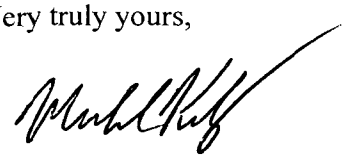
This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2010-113 [Reference 1].

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

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

Executed on April 26, 2011.

Very truly yours,



Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachments (2)

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

Turkey Point Unit 4

RESPONSE TO NRC RAI REGARDING EPU LAR NO. 205
AND UNIT 4 EMCB MECHANICAL/CIVIL ISSUES

ATTACHMENT 1

Response to Request for Additional Information

The following information is provided by Florida Power and Light Company (FPL) to satisfy commitments made in U. S. Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI) responses. This information was requested to support the review of License Amendment Request (LAR) No. 205, Extended Power Uprate (EPU), for Turkey Point Nuclear Plant (PTN) Units 3 and 4 that was submitted to the NRC by FPL letter L-2010-113 on October 21, 2010 [Reference 1].

In an email dated December 16, 2010 [Reference 2], the NRC staff requested additional information regarding FPL's request to implement the EPU. The RAI consisted of four (4) questions from the NRC Mechanical and Civil Engineering Branch (EMCB). By FPL letter L-2011-004 [Reference 7], FPL provided responses to the four RAI questions. The FPL responses to RAIs 1, 3, and 4 contained commitments to complete the design and analyses of the Main Feedwater (FW) piping for pipe rupture locations, the high energy line break (HELB) FW piping deflector shield, and the Component Cooling Water (CCW) and Main Steam (MS) systems piping supports by March 31, 2011 for Unit 3 and April 30, 2011 for Unit 4. The RAI questions and the FPL responses for Turkey Point Unit 4 are documented below.

1. **In Section 2.2.1.2.3 (Attachment 4, Licensing Report) the licensee notes that piping modifications related to the replacement of the number 5 and 6 feedwater heaters will be performed by the PTN design change process. Any impacts to existing pipe rupture locations and associated dynamic effects will be evaluated by the design change process. These statements indicate that the evaluations (design and analysis) of piping modifications and the impact on existing pipe rupture locations and associated dynamic effects required to support the EPU have not yet been performed. Therefore, the licensee has not provided sufficient technical information for staff's review to determine whether reasonable assurance exists to conclude that the integrity of the piping modifications are structurally adequate for the proposed EPU.**

   The following response supersedes the response provided in FPL letter L-2011-004 (ML110120234) for PTN Unit 4. In accordance with the FPL letter L-2011-004, the PTN Unit 3 responses were provided in FPL letter L-2011-102, dated March 25, 2011 [Reference 8].

   The design and analysis of the main feedwater (FW) piping modifications and their impact on existing high energy line break (HELB) pipe break locations and associated dynamic effects required to support the EPU have been completed for PTN Unit 4. The existing HELB pipe break locations are located downstream of the number 6 FW Heaters. No new or different break locations were postulated for the FW system. The analysis included modifications to the FW isolation and regulating valves and the bypass control valves.

   An assessment of the modifications to the FW recirculation piping configuration indicates that the connection points of the recirculation piping to the main FW line are in close proximity to the steam generator feed pumps and are well upstream of the inlet side of the number 6 FW Heaters. The steam generator feed pumps, as well as the adjacent restraints in axial, lateral, and vertical directions downstream of the recirculation piping connection provide a substantial source of anchorage and restraint for the piping in this region. Furthermore, the number 6 FW Heaters serve as analytical anchors for the upstream and

downstream FW piping segments. Therefore, the modifications to the steam generator feed pump recirculation piping will not affect the existing HELB analyses, the postulated pipe break locations, or associated dynamic effects.

As identified in Licensing Report (LR) Section 2.2.1.1, the PTN criteria for identification of HELB locations outside containment and evaluation of their effects are derived from the Atomic Energy Commission (AEC) 1972 Giambusso letter [Reference 3] and subsequent AEC 'Errata Sheet' letter [Reference 6]. FPL responded to the NRC letter in References 4 and 5. In summary, for the FW system, break locations were postulated on the outlet piping of the number 6 FW Heater at:

1. The terminal ends, and
2. Two intermediate locations, which were chosen based on being the two points of highest stress.

There were no intermediate locations between the terminal ends that exceeded the threshold stress limits established by the original AEC criteria of 0.8 ($S_h + S_A$) under the loadings associated with seismic and operational plant conditions. Thus, no intermediate break locations were required to be postulated under this criterion in the current licensing basis.

The pipe stress evaluations for the replacement of the number 6 FW Heaters combined with their associated FW system piping modifications do not indicate any locations exceeding the threshold stress limits of 0.8 ($S_h + S_A$) which would necessitate defining any new intermediate break locations. The existing terminal pipe break locations remain unchanged, at the outlet of the number 6 FW Heaters and the containment penetrations, and there are no postulated pipe break locations associated with the number 5 FW Heaters.

Table 1 below provides the current and EPU calculated pipe stresses, intermediate break stress criteria, and stress margins related to pipe break locations based on the Unit 4 FW Heater replacements for the piping from the terminal ends at the number 6 FW Heaters up to the containment penetrations. Based on the methodology identified in FPL letter dated February 26, 1973 [Reference 5] (as updated by FPL letter dated June 21, 1973 [Reference 4]), the pipe stresses are associated with the combined loadings of pressure, deadweight, thermal, and operating basis earthquake (OBE) seismic for both the existing condition and the EPU condition. Although not part of the loadings defined in the current licensing basis [References 4 and 5], the calculated pipe stresses for the EPU condition also include water hammer (i.e., fluid transient) loading which is considered conservative. It is noted that the stresses in the FW system piping from the water hammer loading are relatively insignificant. The current licensing basis methodology defined in References 4 and 5 is unchanged.

TABLE 1

LOCATION	NODE No.	PIPE SIZE Inch	EXISTING CONDITION			EPU CONDITION		
			STRESS LEVEL psi	INTERMEDIATE BREAK CRITERIA[1] psi	RATIO	STRESS LEVEL psi	INTERMEDIATE BREAK CRITERIA[1] psi	RATIO
Terminal								
Containment Penetration P-27A	905	14	17,519	30,000	0.584	19,912	30,000	0.664
Containment Penetration P-27B	760	14	12,090	30,000	0.403	18,868	30,000	0.629
Containment Penetration P-27C	615	14	15,515	30,000	0.517	17,082	30,000	0.569
Feedwater Heater 4E6A	380	24	11,148	35,000	0.319	10,446	35,000	0.298
Feedwater Heater 4E6B	415	24	18,233	35,000	0.521	12,200	35,000	0.349
Intermediate								
Elbow	500E	14	18,602	35,000	0.531	16,156	35,000	0.462
Elbow	645E	14	15,859	35,000	0.453	20,437	35,000	0.584

(1) Threshold limit of 0.8 ($S_h + S_A$)

The PTN current licensing basis does not require HELBs be postulated in those portions of the piping from the containment wall (penetrations) to and including the outboard isolation valves provided certain installation and in-service inspection examination criteria are met. These portions of the FW piping have been excluded from the table above. The analytical results presented above for EPU conditions include modifying the FW isolation and regulating valves and the bypass control valves. As stated previously, the steam generator feed pump recirculation piping re-configuration will not affect the current HELB analyses. FPL determined these FW system piping modifications do not require changes to the existing pipe break locations or result in unacceptable piping stresses from any associated dynamic loadings.

The FW piping, which is being modified to support the EPU at PTN Unit 4, has been designed using the same design allowable stresses as those specified for Class I Structures, Systems, and Equipment defined in Appendix 5A of the PTN Updated Final Safety Analysis Report (UFSAR). The main FW piping was designed to ensure that the stress limits found in Table 5A-1 of the PTN UFSAR are not exceeded due to the loadings imposed.

3. In Section 2.5.1.3.2.3.4 (Attachment 4, Licensing Report) the licensee notes the replacement of the 6th feedwater heaters will result in resizing of the discharge piping from 18 inches to 24 inches. The jet impingement zones of influence are increasing due to EPU requiring modifications to shield equipment important to safety. These statements indicate that the evaluations (design and analysis) of 24 inch discharge piping, and shield equipment required to support the EPU have not been performed yet. Therefore, the licensee has not provided sufficient technical information for staff's review to determine whether reasonable assurance exists to conclude that the integrity of the required modifications are structurally adequate for the proposed EPU.

The following response supersedes the response provided in FPL letter L-2011-004 (ML110120234) for PTN Unit 4. In accordance with the FPL letter L-2011-004, the PTN Unit 3 responses were provided in FPL letter L-2011-102, dated March 25, 2011 [Reference 8].

Two of the terminal end break locations for the main feedwater (FW) piping are at the outlet of the PTN Unit 4 E6A/B FW Heaters. Due to increase of the FW Heater outlet nozzle diameter to 24 inches from the current outlet nozzle diameter of 18 inches, there is an associated increase in the size of the pipe break zone of influence. The calculated zone of influence for EPU conditions is 18 ft. for the postulated break (increased from 13.5 ft.). The impact to components important to safety from the increased jet impingement zone of influence has been evaluated in the PTN design change process for the replacement of the number 6 FW Heaters in PTN Unit 4. Walkdowns encompassing an 18 foot zone of influence around the number 6 FW Heater outlet pipes have been performed to identify equipment important to safety. Safety-related pressure transmitters PT-4-464, PT-4-476, PT-4-486, PT-4-496, and PT-4-2604 may be influenced by a circumferential FW pipe rupture at the outlet nozzle terminal ends because of their close proximity to the number 6 FW Heaters HELB zone of influence. These components are located within the main steam valve platform trestle area.

To protect these components, new deflector shields will be installed on the FW outlet piping at the postulated circumferential break locations at each of the number 6 FW Heater outlet nozzles. The shields are designed to redirect jet forces and guide streams in a direction away from the safety-related equipment. The design of the HELB deflector shield is shown in Figure 1.

The design and analytical details for the HELB deflector shield for PTN Unit 4 were completed, and will be incorporated into the FW system modification package. The deflector shields are designed as Class III Structures, Systems, and Equipment, but using the same design allowable stresses as those used for Class I Structures, Systems, and Equipment defined in Appendix 5A of the PTN Updated Final Safety Analysis Report (UFSAR) since the criteria for Class III does not include provisions (allowables) for faulted conditions.

Principal stresses were calculated using standard structural finite element method techniques, under various scenarios of applied loading, from the postulated terminal end break. The maximum principal stresses were determined to be less than the stress limits defined in Appendix 5A of the PTN UFSAR for hypothetical accident conditions. As such, no loss of function is assured.

4. Tables 2.2.2.2-3 and 2.2.2.2-4 (Attachment 4, Licensing Report), provide Attributes of Concern for pipe support modifications for Component Cooling and Main Steam piping systems for PTN Units 3 and 4. It is not clear from these tables whether the design and analytical details of modifications for welds, structural members, integral welded attachments (IWA), base plate, anchor bolts, rods, U-bolts, and new snubbers are complete. The licensee is requested to clarify whether the designs for the above modifications are completed or still in progress.

The following response supersedes the response provided in FPL letter L-2011-004 (ML110120234) for PTN Unit 4. In accordance with the FPL letter L-2011-004, the PTN Unit 3 responses were provided in FPL letter L-2011-102, dated March 25, 2011 [Reference 8].

The design and analytical details for pipe support modifications to support EPU implementation for the Component Cooling Water (CCW) and Main Steam (MS) piping systems for PTN Unit 4 have been completed. Walkdowns of the PTN Unit 4 CCW and MS systems piping were completed during the Spring 2011 Unit 4 refueling outage. Walkdown activities confirmed the feasibility of the modifications for the eleven (11) CCW pipe supports and two (2) MS pipe supports listed in LR Table 2.2.2.2-4. Analytical details of the modifications for these pipe support components, such as welds, structural members, integral welded attachments, base plates, anchor bolts, rods, U-bolts and snubbers are complete. Design and modification of these components was performed in accordance with the PTN design change process. The list of piping supports and a description of the changes are provided in the table below.

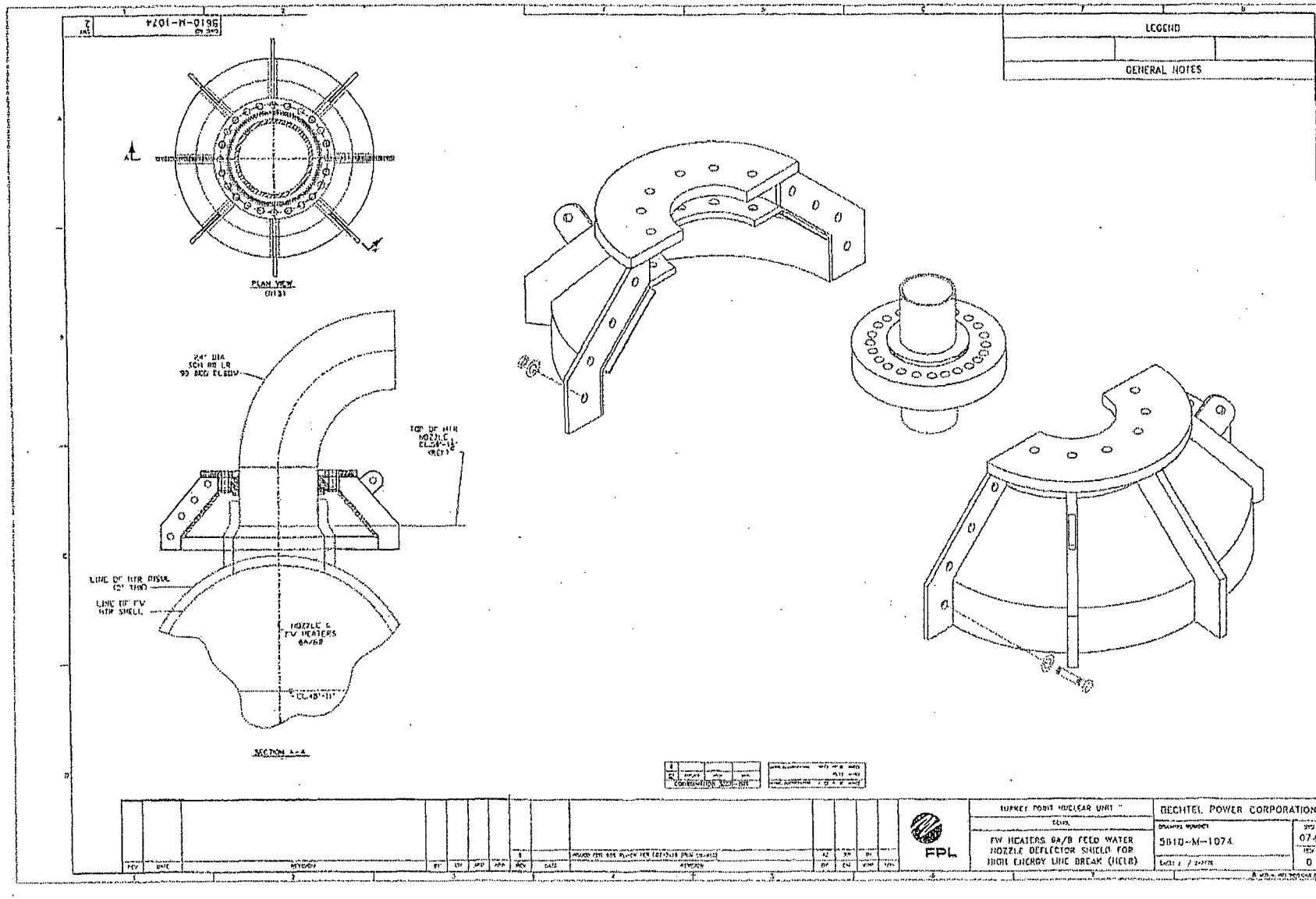
TABLE 2.2.2.2-4 RAI Response

Piping System	Stress Problem No.	Pipe Support Mark No.	Support Attribute of Concern	Resolution
Component Cooling Water	SP-037	4-CCH-17	U-Bolt; [Replace U-Bolt]	Replaced U-Bolt
		SR-709	Weld Stress; [Modify welds]	Modified pipe support
		4-CCH-15	U-Bolt; [Replace U-Bolt]	Replaced U-Bolt
		4-CCH-13	Weld Stress; [Modify welds]	Modified pipe support
	CCW-14	SR-671	Surface Mounted Base Plate; [BP modification]	Base plate modified
		4-ACH-195	Surface Mounted Base Plates; Anchor Bolts; [BP and Anchor Bolt modifications]	Base plate modified
		SR-688	Local Pipe Stress at IWA; [Modify IWA]	Qualified by analysis
		4-ACH-38	Local Pipe Stress at IWA; [Modify IWA]	Qualified by analysis
	CCW-24/038	4-ACH-211	Anchor Bolts; [Anchor bolts mod.]	Modified pipe support
		SR-710	Surface Mounted Base Plates; Anchor Bolts; [BP and anchor bolt mod.]	Qualified by analysis
	CCW-26	4-ACH-263	Surface Mounted Base Plates; Anchor Bolts; [BP and anchor bolt mod.]	Modified pipe support
Main Steam	IC-11	New Vertical Snubber	Install new vertical snubber	Snubber added
	IC-13	IC-13-0901	Anchor Bolts & Plates; [BP and anchor bolt mod.]	Anchor bolts and base plate replaced

References

1. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request No. 205: Extended Power Uprate (EPU)," (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.
2. NRC Email from Jason Paige (NRC) to Steve Franzone (FPL), "EMCB Acceptance Review Questions," December 16, 2010.
3. NRC Letter from A. Giambusso (AEC) to Dr. J. Coughlin (FPL), December 18, 1972.
4. FPL Letter from Dr. J. Coughlin (FPL) letter to A. Giambusso (AEC), "Analysis of Postulated Pipe Failures Outside of Containment Structures," June 21, 1973.
5. FPL Letter from James Coughlin (FPL) letter to A. Giambusso (AEC), "Analysis of Postulated Pipe Failures Outside of Containment Structures", February 26, 1973.
6. NRC Letter from Karl Kniel (AEC) to Dr. J. Coughlin (FPL), January 24, 1973, Errata Sheet.
7. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-004), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Mechanical/Civil Engineering Issues," Accession No. ML110120234, January 7, 2011.
8. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-102), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Unit 3 Mechanical and Civil Engineering Branch Issues," Accession No. ML110880060, March 25, 2011.

Figure 1


LEGEND
GENERAL NOTES
PLAN VIEW
SECTION A-A
FPL
BECHTEL POWER CORPORATION
FW HEATERS 9A/B FEED WATER NOZZLE DEFLECTOR SHIELD FOR HIGH ENERGY LINE BREAK (HELB)
5610-M-1074

Turkey Point Unit 3

RESPONSE TO NRC RAI REGARDING EPU LAR NO. 205
AND UNIT 4 EMCB MECHANICAL/CIVIL ISSUES

ATTACHMENT 2

**CORRECTIONS TO RESPONSES FOR RAIS 1 AND 3
SUBMITTED BY FPL LETTER L-2011-102**

Correction to Response to Turkey Point Unit 3 Commitments
Provided in FPL Letter L-2011-102

By letter L-2011-102, Accession No. ML110880060, dated March 25, 2011 [Reference 1], Florida Power & Light (FPL) provided information to satisfy commitments made in U.S. Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI) responses. This information was requested to support the review of License Amendment Request (LAR) No. 205, Extended Power Uprate (EPU), for Turkey Point Nuclear Plant (PTN) Units 3 and 4 that was submitted to the NRC by FPL letter L-2010-113 on October 21, 2010 [Reference 2].

In an email dated December 16, 2010 [Reference 3], the NRC staff requested additional information regarding FPL's request to implement the Extended Power Uprate. The RAI consisted of four (4) questions from the NRC Mechanical and Civil Engineering Branch (EMCB). By FPL letter L-2011-004 [Reference 4], FPL provided responses to the four RAI questions. The FPL responses to RAIs 1, 3, and 4 contained commitments to complete the design and analyses of the Main Feedwater (FW) piping for pipe rupture locations, the high energy line break (HELB) FW piping deflector shield, and the Component Cooling Water (CCW) and Main Steam (MS) systems piping supports by March 31, 2011 for Unit 3 and April 30, 2011 for Unit 4.

The RAI questions and the FPL responses for PTN 3 were provided in FPL letter L-2011-102. Subsequent to the submittal of the PTN3 responses, errors were identified in the responses to RAIs 1 and 3. The following information provides the correction to the RAIs 1 and 3 responses.

1. **In Section 2.2.1.2.3 (Attachment 4, Licensing Report) the licensee notes that piping modifications related to the replacement of the number 5 and 6 feedwater heaters will be performed by the PTN design change process. Any impacts to existing pipe rupture locations and associated dynamic effects will be evaluated by the design change process. These statements indicate that the evaluations (design and analysis) of piping modifications and the impact on existing pipe rupture locations and associated dynamic effects required to support the EPU have not yet been performed. Therefore, the licensee has not provided sufficient technical information for staff's review to determine whether reasonable assurance exists to conclude that the integrity of the piping modifications are structurally adequate for the proposed EPU.**

   RAI-1 Table 1 is revised to correct the Intermediate Break Criteria for both the existing condition and the EPU condition. As a result of revising the Intermediate Break Criteria, the resultant ratios are also changed. Replace Table 1 with the Table 1 provided below.

TABLE 1

LOCATION	NODE No.	PIPE SIZE inch	EXISTING CONDITION			EPU CONDITION		
			STRESS LEVEL psi	INTERMEDIATE BREAK CRITERIA[1] psi	RATIO	STRESS LEVEL psi	INTERMEDIATE BREAK CRITERIA[1] psi	RATIO
Terminal								
Containment Penetration P-27A	595	14	16,770	30,000	0.559	19,056	30,000	0.635
Containment Penetration P-27B	750	14	20,372	30,000	0.679	22,006	30,000	0.734
Containment Penetration P-27C	890	14	21,152	30,000	0.705	24,416	30,000	0.814
Feedwater Heater 3E6A	400	18/24	17,687	35,000	0.505	5,281	35,000	0.151
Feedwater Heater 3E6B	355	18/24	15,957	35,000	0.456	4,309	35,000	0.123
Intermediate								
Elbow	780E	14	24,633	35,000	0.704	15,627	35,000	0.446
Elbow	625E	14	24,494	35,000	0.700	14,899	35,000	0.426

(1) Threshold limit of 0.8 ($S_h + S_A$)

There are no other changes to RAI-1.

3. In Section 2.5.1.3.2.3.4 (Attachment 4, Licensing Report) the licensee notes the replacement of the 6th feedwater heaters will result in resizing of the discharge piping from 18 inches to 24 inches. The jet impingement zones of influence are increasing due to EPU requiring modifications to shield equipment important to safety. These statements indicate that the evaluations (design and analysis) of 24 inch discharge piping, and shield equipment required to support the EPU have not been performed yet. Therefore, the licensee has not provided sufficient technical information for staff's review to determine whether reasonable assurance exists to conclude that the integrity of the required modifications are structurally adequate for the proposed EPU.

The next to the last paragraph of the response to RAI 3 contains an editorial error in that it states, "...Class III includes criteria (allowables) for faulted conditions." This paragraph is revised to correctly state "...Class III does not include provisions (allowables) for faulted conditions." Replace this paragraph with the paragraph provided below.

> The design and analytical details for the HELB deflector shield for PTN Unit 3 were completed, and will be incorporated into the FW system modification package. The deflector shields are designed as Class III Structures, Systems, and Equipment, but using the same design allowable stresses as those used for Class I Structures, Systems, and Equipment defined in Appendix 5A of the PTN Updated Final Safety Analysis Report (UFSAR) since the criteria for Class III does not include provisions (allowables) for faulted conditions.

There are no other changes to RAI-3.

References

1. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-102), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Unit 3 Mechanical and Civil Engineering Branch Issues," Accession No. ML110880060, March 25, 2011.
2. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request No. 205: Extended Power Uprate (EPU)," (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.
3. NRC Email from Jason Paige (NRC) to Steve Franzone (FPL), "EMCB Acceptance Review Questions," Accession No. ML103500496, December 16, 2010.
4. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-004), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Mechanical/Civil Engineering Issues," Accession No. ML110120234, January 7, 2011.