

## TurkeyPointRAIsPEm Resource

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**From:** Comar, Manny  
**Sent:** Monday, August 01, 2011 4:14 PM  
**To:** TurkeyPointRAIsPEm Resource  
**Subject:** REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 033 RELATED TO SRP SECTION 14.03.10- EP-ITAAC FOR THE TURKEY POINT UNITS 6 AND 7 COL APPLICATION  
**Attachments:** PTN-RAI-LTR-033.doc

**Hearing Identifier:** TurkeyPoint\_COL\_eRAIs  
**Email Number:** 38

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**Subject:** REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 033 RELATED TO SRP SECTION 14.03.10- EP-ITAAC FOR THE TURKEY POINT UNITS 6 AND 7 COL APPLICATION  
**Sent Date:** 8/1/2011 4:13:51 PM  
**Received Date:** 8/1/2011 4:13:51 PM  
**From:** Comar, Manny

**Created By:** Manny.Comar@nrc.gov

**Recipients:**  
"TurkeyPointRAIsPEm Resource" <TurkeyPointRAIsPEm.Resource@nrc.gov>  
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**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

August 1, 2011

Mano K. Nazar  
Senior Vice President and Chief Nuclear Officer  
Florida Power & Light Company  
Mail Stop NNP/JB  
700 Universe Blvd  
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 033 RELATED TO SRP SECTION 14.03.10- EMERGENCY PLANNING –INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COMBINED LICENSE APPLICATION

Dear Mr. Nazar:

By letter dated June 30, 2009, as supplemented by letters dated August 7, 2009, September 3, 2010 and December 21, 2010, Florida Power and Light submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced passive pressurized water reactors pursuant to 10 CFR Part 52. The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If you are unable to provide a response within 30 days, please state when you will be able to provide the response. In the event the response submitted is incomplete, please indicate in the response when the complete response will be provided. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes. Your response should also indicate whether any of the information provided is to be withheld as exempt from public disclosure pursuant to 10 CFR 2.390.

If you have any questions or comments concerning this matter, you may contact me at 301-415-3863 or [manny.comar@nrc.gov](mailto:manny.comar@nrc.gov).

Sincerely,

**/RA/**

Manny Comar, Lead Project Manager  
AP1000 Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-040  
52-041

Enclosure:  
Request for Additional Information

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-3863 or manny.comar@nrc.gov.

Sincerely,

**/RA/**

Manny Comar, Lead Project Manager  
AP1000 Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-040  
52-041  
eRAI Tracking No. 5682

Enclosure:  
Request for Additional Information

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NRO-002

OFFICE	DDEP/BC	NWE1/PM	OGC	NWE1/L-PM
NAME	KWilliams*	MComar*	BWeisman*	MComar*
DATE	6/29/11	6/30/11	7/13/11	7/26/11

\*Approval captured electronically in the electronic RAI system.

**OFFICIAL RECORD COPY**

Request for Additional Information No. 5682  
8/1/2011

Turkey Point Units 6 and 7  
Florida P and L  
Docket No. 52-040 and 52-041  
SRP Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses, and  
Acceptance Criteria  
Application Section: Part 10: ITAAC

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

14.03.10-1

Part 10, Tier 1/ITAAC - COL application Part 10, "License Conditions and ITAAC" (Revision 2, December 21, 2010), includes emergency planning (EP) ITAAC in Table 3.8-1, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria." Please address the following comments by making the identified revisions (including any other conforming or necessary changes), or explain why the revisions are not appropriate:

a. Since the EP ITAAC table will be duplicated and attached to the combined license (COL) for both Unit 6 and Unit 7, control room references should be to a single control room, rather than control rooms or each control room. Revise ITAAC Table 3.8-1 to reflect a single control room (e.g., change "control rooms" to "control room", or "each control room" to "the control room"). This includes ITAAC 1.1.1, 2.1, 3.1, 3.2, 5.1.3, 5.1.7, 5.1.8, 5.2.2, 6.1, and 6.4. Make any other necessary conforming changes. In addition, make the following minor ITAAC language changes: (1) In ITAAC 8.1.1.D.3, identify the first acceptance criterion with "a." before "Emergency response communications listed in EIPs are available and operational." and renumber a., b., and c. as b., c., and d. (2) In ITAAC 8.1.3, revise the acceptance criterion to change "condition requiring offsite" to "condition requires offsite". (3) In ITAAC 8.1.1.E.2.a, add a closing parenthesis after the last word (i.e., "ERO personnel.>"). (4) Delete the duplicate ITAAC 8.1.1.E.2.b.

b. In ITAAC 5.1 inspections, tests, analyses, delete the second sentence, which reads: "These facilities will meet the criteria of NUREG-0696 with exceptions."

c. In ITAAC 5.1.1, the acceptance criterion states that the TSC size is consistent with NUREG-0696, and does not specify the actual size; which would be determined by the specific number of staff (at 75 square feet/person). Since there will be a common TSC for Units 3, 4, 6 and 7, the TSC size is likely to be greater than the 1875 square feet of floor space indicated in AP1000 DCD Tier 1 Table 3.1-1. Revise acceptance criterion 5.1.1 to specify the common TSC size, consistent with the proposed facility staffing (see, for example, ITAAC acceptance criterion 5.2.1).

d. In ITAAC 5.1.5, the acceptance criterion does not identify what plant and environmental information is available in the TSC (e.g., where it is listed in the COL application or AP1000 DCD). Revise the acceptance criterion to clearly identify the source/listing of the available information/parameters (see also, comment to ITAAC 5.2.3, below). In addition, delete the last sentence in the acceptance criterion, which reads: "These capabilities have been demonstrated during testing and acceptance

activities." This sentence seems more appropriate for the inspections, tests, analyses column, and appears to be covered by the existing (first) sentence under 5.1, which reads: "An inspection of the TSC and OSC will be performed, including a test of their capabilities.

e. Add a new ITAAC acceptance criterion 5.1.9, which states: "Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the high-efficiency particulate air (HEPA) and charcoal filter system upon detection of high radiation in the TSC." (See Vogtle COLA Unit 3 EP ITAAC 5.1.8, which addresses habitability for a separate TSC.) As an alternative to adding a new acceptance criterion 5.1.9, other acceptance criteria in Table 3.8-1 (e.g., 5.1.4) may be revised to include language similar to 5.1.9, above.

f. The COL application references the AP1000 standard design, which includes ITAAC associated with emergency response facilities in DCD Tier 1 Table 3.1-1, "Inspections, Tests, Analyses, and Acceptance Criteria." The ITAAC in this table associated with the TSC and Operations Support Center (OSC) are replaced by ITAAC in COL application Part 10 Table 3.8-1. To the extent that the Table 3.8-1 ITAAC represent a replacement of the comparable Table 3.1-1 ITAAC, submit an appropriate exemption request that addresses this Tier 1 departure, pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52.

g. In ITAAC 5.2.1, delete the two bullets in the acceptance criterion. Since the existing emergency operations facility (EOF) supporting Units 3 and 4 will be used for Units 6 and 7, the location and adequacy of the EOF building is outside of the scope of the staff's review of the COL application, pursuant to Section 13.3, "Emergency Planning" (Subsection I, "Areas of Review"), of NUREG-0800.

h. In ITAAC 5.2.3, revise the acceptance criterion to clearly identify the source/listing of the plant system data (or other plant parameters) that will be displayed in the EOF (see also, comment to ITAAC 5.1.5, above).

i. ITAAC 8.1.1.C.1.a (regarding TSC command and control demonstration), and 8.1.1.D.1 and 8.1.1.D.1.a (regarding OSC, TSC, and EOF activation), indicate demonstration of the acceptance criterion "within 90 minutes" of the event classification. Explain the basis for the 90-minute criteria, and whether it is related to the 90-minute augmentation time in COLA Part 5 Table B-1b, "Staffing Requirements for the Turkey Point Plant Emergency Response Organization." If the 90-minute acceptance criteria are related to, or dependent upon Table B-1b, revise the time to be consistent with any changes to Table B-1b that result from your responses to NRC RAI 5681 (e.g., RAI B-6 through B-13), if appropriate.

j. Add a new ITAAC acceptance criterion 8.1.1.D.2.d, which states: "Demonstrate the capability of TSC and EOF equipment and data displays to clearly identify and reflect the affected unit." (See Vogtle COLA Unit 3 EP ITAAC 8.1.1.D.2.d, which addresses human factors engineering.)