



L-2011-462
10 CFR 52.3

October 31, 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. 039
(eRAI 5995) Standard Review Plan Section 08.03.01 - AC Power Systems

Reference:

1. NRC Letter to FPL dated September 29, 2011, Request for Additional Information Letter No.039 Related to SRP Section 08.03.01 - AC Power 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) Request for Additional Information (RAI) 08.03.01-1 and 08.03.01-2 provided in Reference 1. 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 October 31, 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

WDM/RFB

Attachment 1: FPL Response to NRC RAI No. 08.03.01-1 (eRAI 5995)

Attachment 2: FPL Response to NRC RAI No. 08.03.01-2 (eRAI 5995)

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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
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FPL Response to NRC RAI No. 08.03.01-1 (eRAI 5995)
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NRC RAI Letter No. PTN-RAI-LTR-039

SRP Section: 08.03.01 - AC Power Systems (Onsite)

Question for Electrical Engineering Branch (EEB)

NRC RAI Number: 08.03.01-1 (eRAI 5995)

FSAR Section 8.3.1.1.7 describes the grounding system. The staff notes that Regulatory Guide 1.204 endorses IEEE Std. 665 for Generation Station grounding. This standard is included in the same section of the DCD. Although IEEE Std. 80 is referenced in IEEE Std. 665 and Regulatory Guide 1.204, please confirm that the use of IEEE Std. 80 did not invalidate the Turkey Point compliance with the Regulatory Guide 1.204 guidance, or explain why this guidance document was not followed.

FPL RESPONSE:

FSAR Section 8.3.1.1.7 describes the use of methodology outlined in IEEE 80 for the design of the site specific grounding grid.

The IEEE standard 80 methodology was used in the determination of ground grid conductor size for the Turkey Point Units 6 & 7 site and does not invalidate compliance with Regulatory Guide 1.204.

FSAR Appendix 1AA, Conformance With Regulatory Guides, states that Turkey Point Units 6 & 7 conform to RG 1.204, Rev. 0, with no exceptions.

This response is PLANT SPECIFIC.

References:

None

ASSOCIATED COLA REVISIONS:

No COLA changes are required.

ASSOCIATED ENCLOSURES:

None

Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
FPL Response to NRC RAI No. 08.03.01-2 (eRAI 5995)
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NRC RAI Letter No. PTN-RAI-LTR-039

SRP Section: 08.03.01 - AC Power Systems (Onsite)

Question for Electrical Engineering Branch (EEB)

NRC RAI Number: 08.03.01-2 (eRAI 5995)

FSAR Section 8.3.1.1.8 describes lightning protection. In FSAR Section 8.1, Table 8.1-201 it is stated that RG 1.204 is implemented via IEEE Standard 665. However, in Appendix 1AA, it is stated that Turkey Point units conform to RG 1.204, Rev.0. The Regulatory Guide also endorses IEEE Std. 666-1991, IEEE Std. 1050-1996, and IEEE Std. C62.23-1995. Please discuss the applicability of these other Standards.

FPL RESPONSE:

FSAR Appendix 1AA, Conformance With Regulatory Guides, states that Turkey Point Units 6 & 7 conforms with RG 1.204 Rev. 0, with no exceptions. In accordance with RG 1.204, Turkey Point Units 6 & 7 will comply with IEEE Std. 665, IEEE Std. 666, IEEE Std. 1050, and IEEE Std. C62.23.

FSAR Table 8.1-201 will be revised to remove the note: Implemented via IEEE-665, "*IEEE Guide for Generating Station Grounding*" under the 'Remarks' column for RG 1.204.

This response is PLANT SPECIFIC.

References:

None

ASSOCIATED COLA REVISIONS:

Table 8.1-201 will be revised in future COLA revision as indicated below:

Table 8.1-201 on page 8.1-3 will be revised to remove the note under the 'Remarks' column for RG 1.204 (row 4 of Table 8.1-201).

| | | | | | | | |
|--|----|----------|---|---|---|--|--|
| | c. | RG 1.204 | Guidelines for Lightning Protection of Nuclear Power Plants | G | G | | Implemented via IEEE 665, IEEE Guide for Generating Station Grounding |
|--|----|----------|---|---|---|--|--|

ASSOCIATED ENCLOSURES:

None