



DEC 09 2011

L-2011-539  
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  
Draft Environmental Assessment Review Supporting  
Extended Power Uprate License Amendment Request No. 205

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) J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – Draft Environmental Assessment and Finding of No Significant Impact Related to the Proposed Extended Power Uprate (TAC Nos. ME4907 and ME4908)," Accession No. ML11270A379, November 4, 2011.

By letter L-2010-113 dated October 21, 2010 [Reference 1], Florida Power and Light Company (FPL) requested to amend the Renewed Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Units 3 and 4 Technical Specifications (TS) to implement an Extended Power Uprate (EPU) for each unit of approximately 15% that includes a 13% power uprate and a 1.7% measurement uncertainty recapture (MUR). The proposed amendments 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 Technical Specifications to support operation at this increased core thermal power level.

On November 4, 2011, U.S. Nuclear Regulatory Commission (NRC) issued a draft Environmental Assessment (EA) for the Turkey Point Units 3 and 4 Extended Power Uprate [Reference 2]. On November 17, 2011, the draft EA was published in the Federal Register for public comment. After a review of the draft EA, FPL has the following comments:

On Pages 3 and 17 of the Turkey Point Units 3 and 4 - Draft Environmental Assessment and Finding of No Significant Impact Related to the Proposed Extended Power Uprate, the number of workers that FPL estimated will be at Turkey Point Units 3 and 4 to implement the EPU is stated. The total number of personnel associated with the operational staff (800) and refueling outages (600 - 900) is projected to remain approximately the same. FPL has determined there will be a need for additional workers to implement the EPU. FPL's current projections are that it will need approximately 2500 workers for the EPU resulting in a potential maximum outage/EPU workforce of approximately 3400 during each of the EPU outages. The increase in the number of workers will be an added economic benefit to our local communities. The additional personnel will be assigned to scheduled shifts which will minimize the number of personnel on site at any one time and also minimize any adverse impacts associated with additional workers. In addition, FPL has projected that the outage times necessary to implement the EPU are approximately 160 days for Unit 3 and 130 days for Unit 4.

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FPL's assessment is that the environmental and socioeconomic impacts from the above changes are not significantly altered from the previous analyses. While there will be an increase in traffic as a result of the above changes to the Turkey Point Uprate Project, the projected traffic remains well within the Miami-Dade County Available Peak Hour Capacity. As a result, these roadways will operate at an acceptable Level of Service (LOS) as designated by Miami-Dade County. Thus, the NRC's conclusion in Table 1, that there will be no significant socioeconomic impacts from EPU-related temporary increase in workforce remains valid.

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

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 December 9<sup>th</sup>, 2011.

Very truly yours,



Michael Kiley  
Site Vice President  
Turkey Point Nuclear Plant

cc: USNRC Regional Administrator, Region II  
USNRC Project Manager, Turkey Point Nuclear Plant  
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant  
William Passetti, Florida Department of Health