



December 15, 2011

L-2011-557  
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

RE: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
St. Lucie Response to the Request for Additional Information Regarding 60-day  
Response to NRC Bulletin 2011-01, "Mitigating Strategies"

References:

1. Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011.
2. FPL Letter L-2011-207 dated June 9, 2011, "30-Day Response to NRC Bulletin 11-01, Mitigating Strategies"
3. FPL Letter L-2011-244 dated July 8, 2011, "60-Day Response to NRC Bulletin 2011-01, 'Mitigating Strategies' "
4. NRC Letter from Tracy Orf to Mano Nazar dated November 18, 2011, "St. Lucie Plant, Units 1 and 2 – Request for Additional Information Regarding 60-Day Response to Bulletin 2011-01, "Mitigating Strategies" (TAC Nos. ME6477 and ME6478)"

The Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011 (Reference 1), to request each licensee to provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2). Addressees were required to provide a written response to the NRC in accordance with 10 CFR 50.54(f).

In Bulletin 2011-01, the NRC requested each licensee to submit a written response within 30 and 60 days of the date of the Bulletin. St. Lucie provided those responses in FPL letter L-2011-207 dated June 9, 2011 (Reference 2) and FPL letter L-2011-244 dated July 8, 2011 (Reference 3). Reference 4 forwarded a NRC request for additional information (RAI).

The attachment to this letter forwards the RAI response and includes information that addresses measures that are currently in place. There are no new regulatory commitments contained in this letter. If there are any questions, or if additional information is required, please contact Eric S. Katzman, Licensing Manager, at (772) 467-7734.

A146  
NRR

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

Executed on December 15, 2011.

A handwritten signature in black ink, appearing to read "Richard L. Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Richard L. Anderson  
Site Vice President  
St. Lucie Plant

Attachment: St. Lucie Response to the Request for Additional Information Regarding 60-day  
Response to NRC Bulletin 2011-01, "Mitigating Strategies"

St. Lucie Response to the Request for Additional Information Regarding  
60-day Response to NRC Bulletin 2011-01, "Mitigating Strategies"

On November 18, 2011, the NRC issued a request for additional information concerning Bulletin 2011-01 "Mitigating Strategies." The response to the RAI is provided below.

Many of the items described below represent current station practices. Individual items may be revised or adjusted in the future based on new or revised vendor recommendations, industry experience, etc., in accordance with NEI 99-04 Revision 0 "Commitment Management Guidelines."

**RAI:**

Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

**Discussion:**

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The NRC staff could not determine if you performed activities to ensure that these devices will be functional when needed.

**FPL Response:**

Monitor nozzles, spray nozzles, couplings, fittings, valves, gaskets and required tools are inventoried and inspected for damage quarterly in accordance with plant procedures. If any deficiencies are noted the Shift Manager is notified and a Condition Report is generated that contains instructions to expedite corrective actions necessary to meet the B.5.b NRC commitments using the work control process. The identified component is then repaired or replaced as required. In addition, plant procedures require that the monitor nozzles be tested during the annual (first quarter) portable fire pump functional flow test.