

11/29/2011
76FR 73738

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January 13, 2012
L-2012-017

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Chief, Rulemaking, Directives and Editing Branch (RADB)
Office of Administration (Mail Stop: TWB-05-B01M)
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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RULES AND DIRECTIVES
SECTION

Subject: 2011 Reactor Oversight Process External Survey

Florida Power and Light Company, the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, (hereafter referred to as FPL) and its affiliates, NextEra Energy Seabrook, LLC (NextEra Energy Seabrook) the licensee for Seabrook Station; NextEra Energy Duane Arnold, LLC (NextEra Energy Duane Arnold), the licensee for Duane Arnold Energy Center; and NextEra Energy Point Beach, LLC (NextEra Energy Point Beach), the licensee for Point Beach Nuclear Plant, Units 1 and 2 (collectively referred to as NextEra Energy), appreciates the opportunity to comment on the above listed document. FPL and NextEra Energy endorse each of the comments provided by the Nuclear Energy Institute (NEI).

Overall, FPL and NextEra agree that the ROP provides adequate assurance, when combined with other NRC regulatory processes, that plants are being operated and maintained safely and securely. FPL and NextEra endorse the comments provided on behalf of the nuclear industry by the Nuclear Energy Institute (NEI) and provides the following comments regarding the 2011 ROP survey questions:

- 4. PI program effectively contributes to the identification of performance outliers based on risk-informed, objective, and predictable indicators.

FPL/NextEra Energy comment:

The documentation of "historical" SSFFs in a licensee event report (LER) may be counter-productive for both the licensee and for the NRC, since it could unnecessarily trigger a supplemental inspection that is not warranted based on licensee current performance.

SONSI Review Complete

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NextEra Energy, Inc.

700 Universe Boulevard, Juno Beach, FL 33408

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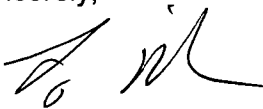
11. ROP oversight activities are predictable (i.e., controlled by the process) and reasonably objective (i.e., based on supported facts, rather than relying on subjective judgment).

FPL/NextEra Energy comment:

There is room for improvement in the closure of unresolved or open issues identified in inspection reports. Licensees typically maintain metrics associated with the length of time unresolved issues (URIs) and LERs are open. It would be helpful if the NRC also did this with a goal of closure in 6 months as this would promote increased predictability in the ROP oversight activities.

As a final note, FPL and NextEra endorse the continued monthly interactions between NRC and industry through the ROP Task Force as they are critical to continued improvement of the ROP and ensuring the process is as predictable and efficient as possible.

Sincerely,



Larry Nicholson
Director, Nuclear Licensing