



January 21, 2012

L-2011-036
10 CFR 50.4
EPP 3.2.4

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Environmental Protection Plan Report
Request for Minor Revision to IWW Permit No. FL0002208

Pursuant to Section 3.2.4 of the St. Lucie Environmental Protection Plan, Florida Power & Light Company (FPL) is hereby providing the enclosed copy of the requested revision to the Industrial Wastewater Facility Permit (Permit Number FL0002208) at the same time that it is being submitted to the State of Florida Department of Environmental Protection.

Please contact Vince Munné (772) 263-2847 should you have any questions on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric S. Katzman'.

Eric S. Katzman
Licensing Manager
St. Lucie Plant

ESK/kdr

Enclosure

LE25
NRR



January 21, 2012

Marc Harris, P.E.
Florida Dept. of Environmental Protection
Industrial Wastewater Section
2600 Blair Stone Road, MS 3545
Tallahassee, Florida 32399-2400

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7006 3450 0003 0174 4622

RE: Florida Power & Light Company
St. Lucie Power Plant Units 1 and 2
IWW Permit No. FL0002208
Request for Minor Revision

Dear Mr. Harris

Based on our review of the revised Industrial Wastewater Permit FL0002208 issued on September 29, 2011, St. Lucie is recommending several changes for your consideration. St. Lucie is requesting a Minor Revision to the permit to address typographical errors, wording changes, and clarifying statements and parameters in the printed monthly Discharge Monitor Report. Also requested is a due date extension for the Administrative Order AO022TL final reports to allow adequate time to properly evaluate project data.

The following enclosures are included herein:

- 1) Description of the change requests (Enclosure 1)
- 2) Three (3) signed copies of FDEP Form 62-620.910(9), Application for a Minor Revision to a Wastewater Facility or Activity Permit (Enclosure 2)
- 3) Mark-ups of the applicable permit and Discharge Monitoring Report text (Enclosure 3)
- 4) FPL check payable to the State of Florida, Department of Environmental Protection in the amount of \$250.00 for the application fee (Enclosure 4)

If you have any questions or need additional information, please contact Vince Munné at (772) 263-2847.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Anderson", is written over a horizontal line.

Richard L. Anderson
Site Vice president
St. Lucie Plant

VPPSL003

cc: Siting Office

Enclosure 1

Description of the Change Requests

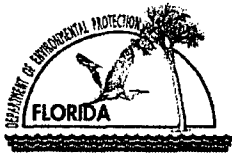
(1 page)

- 1) General Conditions of the NPDES Permit, Section 22.b.3 reads - Permit Condition IX.22.b. The correct verbiage is Permit Condition IX.22.c
- 2) General Conditions of the NPDES Permit, Section 22.d reads – Permit Condition IX.22.a.1. The correct verbiage is Permit Condition IX.22.b.1.
- 3) After a review of the new Discharge Monitoring Report, several issues were identified that require clarification or wording changes. Listed below is an aggregate of the requested changes:
 - a.) For the Flow Parameter associated with Monitoring Group Number D-001, under Sample Type, it is requested that "Pump Curves" be changed to "Pump Logs"
 - b.) For the Chlorination Duration parameter associated with Monitoring Group Number D-001, it is requested that a designated entry be provided in the report for both Unit 1 (U-1) and Unit 2 (U-2).
 - c.) For the Monitoring Group Description associated with Monitoring Group Number I-003, it is requested that the caption after "MONITORING GROUP DESCRIPTION" be changed to, "Liquid radiation waste discharge to the discharge canal to the Atlantic Ocean".
- 4) FPL requests that the due dates for the final reports identified in Administrative Order AO022TL (Biological Plan of Study and Heated Water Plan of Study) be extended to 120 days to allow adequate time to properly evaluate project data.

Enclosure 2

Three (3) Signed Copies of FDEP Form 62-620.910(9), Application for a Minor
Revision to a Wastewater Facility or Activity Permit

(6 pages)



APPLICATION FOR A MINOR REVISION TO A WASTEWATER FACILITY OR ACTIVITY PERMIT

1. Instructions

- In accordance with Rule 62-620.325, F.A.C., this form must be submitted to the appropriate Department district office or approved local program when requests for minor revisions to a permit or minor modifications to a facility are made by a permittee, except for transfer of a permit to a new permittee and addition of a major user of reclaimed water to a Part III reuse system. Application for transfer of a permit to a new permittee shall be made on DEP Form 62-620.910(11). Application for addition of a major user of reclaimed water shall be made on DEP Form 62-610.300(4)(a)1.
- Each applicable item must be completed in full in order to avoid delay in processing of this form. Where attached sheets or other technical documentation are provided, indicate appropriate cross-references.
- Three (3) copies of this application with supporting documentation shall be submitted with this form.
- All information is to be typed or printed in ink. Dates are to be entered in MM/DD/YR format.
- This application and attachments shall be signed in accordance with Rule 62-620.305, F.A.C. Also, as applicable, this application and all attachments shall be signed and sealed by a professional engineer registered in Florida in accordance with Rule 62-620.310, F.A.C.

2. Facility Information

- a. Permit Number: FL0002208 b. Facility Identification Number: _____
- c. Project/Facility Name: St. Lucie Power Plant
- d. Contact Name: Vince Munne
- Number and Street: 6501 S. Ocean Drive
- City/State/Zip Code: Jensen Beach, FL 34957
- Telephone: 772-263-2847

3. Type of Revision

- Correct Typographical Errors¹** - Submit one copy of each page of the permit showing revisions being requested.
- Change Improvement Schedule¹** - Provide a description of the improvement, a list of the dates to be revised, and a reason for the proposed change in each date.
- Change Expiration Date of Permit¹** - Provide the current and proposed expiration dates for the permit and the reasons for the proposed change.
- Change Staffing Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-699, F.A.C.
- Change Monitoring and Reporting Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-601, F.A.C.

¹A processing fee is not required.

²A processing fee is required with the application in accordance with Rule 62-4.050, F.A.C.

- Modify Approved Pretreatment Program¹** - Describe the proposed modification and provide the information required by Rule 62-625.540, F.A.C.
- Delete Point Source Outfall¹** - Identify the outfall and explain why the outfall is being eliminated.
- Modify or Expand Approved Residuals Land Application Sites²** - Attach a new or updated Agricultural Use or Dedicated Site Plan as required by Chapter 62-640, F.A.C.
- Minor Modification to the Facility²** - Provide a description of the proposed modification. If applicable, attach any reports, plans, and specifications which have been developed to implement this modification.
- Other²** - Provide appropriate documentation. Describe.

4. Certifications

a. Applicant or Authorized Representative

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Richard L. Anderson (Signature of Applicant or Authorized Representative³) 01/21/2012 (Date)

Name (please type) Richard L. Anderson Company Name FPL
 Title Site Vice President Company Address: 6501 S. Ocean Drive
 Phone: 772-467-7101 City/State/Zip Code: Jensen Beach, FL 34957

b. Professional Engineer Registered in Florida

I certify that the engineering features of this project have been (designed) (examined) by me and found to conform to engineering principles applicable to such projects. In my professional judgement, this facility, when properly constructed, operated, and maintained, will comply with all applicable statutes of the State of Florida and rules of the Department.

Name (please type): Not Required for this Revision
 Florida Registration Number: _____
 Company Name: _____
 Company Address: _____
 City/State/Zip Code: _____
 Phone Number: _____

 (Seal, Signature, Date, and Registration Number)

³If signed by the authorized representative, attach a letter of authorization in accordance Rule 62-620.305, F.A.C.



APPLICATION FOR A MINOR REVISION TO A WASTEWATER FACILITY OR ACTIVITY PERMIT

1. Instructions

- a. In accordance with Rule 62-620.325, F.A.C., this form must be submitted to the appropriate Department district office or approved local program when requests for minor revisions to a permit or minor modifications to a facility are made by a permittee, except for transfer of a permit to a new permittee and addition of a major user of reclaimed water to a Part III reuse system. Application for transfer of a permit to a new permittee shall be made on DEP Form 62-620.910(11). Application for addition of a major user of reclaimed water shall be made on DEP Form 62-610.300(4)(a)1.
- b. Each applicable item must be completed in full in order to avoid delay in processing of this form. Where attached sheets or other technical documentation are provided, indicate appropriate cross-references.
- c. Three (3) copies of this application with supporting documentation shall be submitted with this form.
- d. All information is to be typed or printed in ink. Dates are to be entered in MM/DD/YR format.
- e. This application and attachments shall be signed in accordance with Rule 62-620.305, F.A.C. Also, as applicable, this application and all attachments shall be signed and sealed by a professional engineer registered in Florida in accordance with Rule 62-620.310, F.A.C.

2. Facility Information

a. Permit Number: FL0002208 b. Facility Identification Number: _____
c. Project/Facility Name: St. Lucie Power Plant
d. Contact Name: Vince Munne
Number and Street: 6501 S. Ocean Drive
City/State/Zip Code: Jensen Beach, FL 34957
Telephone: 772-263-2847

3. Type of Revision

- Correct Typographical Errors¹** - Submit one copy of each page of the permit showing revisions being requested.
- Change Improvement Schedule¹** - Provide a description of the improvement, a list of the dates to be revised, and a reason for the proposed change in each date.
- Change Expiration Date of Permit¹** - Provide the current and proposed expiration dates for the permit and the reasons for the proposed change.
- Change Staffing Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-699, F.A.C.
- Change Monitoring and Reporting Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-601, F.A.C.

¹A processing fee is not required

²A processing fee is required with the application in accordance with Rule 62-4.050, F.A.C.

- Modify Approved Pretreatment Program¹** - Describe the proposed modification and provide the information required by Rule 62-625.540, F.A.C.
- Delete Point Source Outfall¹** - Identify the outfall and explain why the outfall is being eliminated.
- Modify or Expand Approved Residuals Land Application Sites²** - Attach a new or updated Agricultural Use or Dedicated Site Plan as required by Chapter 62-640, F.A.C.
- Minor Modification to the Facility²** - Provide a description of the proposed modification. If applicable, attach any reports, plans, and specifications which have been developed to implement this modification.
- Other²** - Provide appropriate documentation. Describe.

4. Certifications

a. Applicant or Authorized Representative

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Richard L. Anderson (Signature of Applicant or Authorized Representative³) 01/21/2012 (Date)

Name (please type) Richard L. Anderson Company Name FPL
 Title Site Vice President Company Address: 6501 S. Ocean Drive
 Phone: 772-467-7101 City/State/Zip Code: Jensen Beach, FL 34957

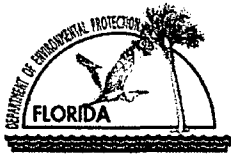
b. Professional Engineer Registered in Florida

I certify that the engineering features of this project have been (designed) (examined) by me and found to conform to engineering principles applicable to such projects. In my professional judgement, this facility, when properly constructed, operated, and maintained, will comply with all applicable statutes of the State of Florida and rules of the Department.

Name (please type): Not Required for this Revision
 Florida Registration Number: _____
 Company Name: _____
 Company Address: _____
 City/State/Zip Code: _____
 Phone Number: _____

 (Seal, Signature, Date, and Registration Number)

¹If signed by the authorized representative, attach a letter of authorization in accordance Rule 62-620.305, F.A.C.



APPLICATION FOR A MINOR REVISION TO A WASTEWATER FACILITY OR ACTIVITY PERMIT

1. Instructions

- In accordance with Rule 62-620.325, F.A.C., this form must be submitted to the appropriate Department district office or approved local program when requests for minor revisions to a permit or minor modifications to a facility are made by a permittee, except for transfer of a permit to a new permittee and addition of a major user of reclaimed water to a Part III reuse system. Application for transfer of a permit to a new permittee shall be made on DEP Form 62-620.910(11). Application for addition of a major user of reclaimed water shall be made on DEP Form 62-610.300(4)(a)1.
- Each applicable item must be completed in full in order to avoid delay in processing of this form. Where attached sheets or other technical documentation are provided, indicate appropriate cross-references.
- Three (3) copies of this application with supporting documentation shall be submitted with this form.
- All information is to be typed or printed in ink. Dates are to be entered in MM/DD/YR format.
- This application and attachments shall be signed in accordance with Rule 62-620.305, F.A.C. Also, as applicable, this application and all attachments shall be signed and sealed by a professional engineer registered in Florida in accordance with Rule 62-620.310, F.A.C.

2. Facility Information

- a. Permit Number: FL0002208 b. Facility Identification Number: _____
- c. Project/Facility Name: St. Lucie Power Plant
- d. Contact Name: Vince Munne
- Number and Street: 6501 S. Ocean Drive
- City/State/Zip Code: Jensen Beach, FL 34957
- Telephone: 772-263-2847

3. Type of Revision

- Correct Typographical Errors¹** - Submit one copy of each page of the permit showing revisions being requested.
- Change Improvement Schedule¹** - Provide a description of the improvement, a list of the dates to be revised, and a reason for the proposed change in each date.
- Change Expiration Date of Permit¹** - Provide the current and proposed expiration dates for the permit and the reasons for the proposed change.
- Change Staffing Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-699, F.A.C.
- Change Monitoring and Reporting Requirements²** - Describe the proposed change and submit justification for the change in accordance with Chapter 62-601, F.A.C.

¹A processing fee is not required.

²A processing fee is required with the application in accordance with Rule 62-4.050, F.A.C.

VPPSL003

Enclosure 3

Mark-ups of the Applicable Permit and Discharge Monitoring Report Text

(3 pages)

PERMITTEE: Florida Power & Light (FPL)
FACILITY: St. Lucie Power Plant

PERMIT NUMBER: FL0002208 (Major)
EXPIRATION DATE: September 28, 2016

- c. If the oral report has been received within 24 hours, the noncompliance has been corrected, and the noncompliance did not endanger health or the environment, the Department's Southeast District Office shall waive the written report.

[62-620.610(20)]

21. The permittee shall report all instances of noncompliance not reported under Permit Conditions IX.17, 18 or 19 of this permit at the time monitoring reports are submitted. This report shall contain the same information required by Permit Condition IX.20 of this permit. [62-620.610(21)]

22. Bypass Provisions.

- a. "Bypass" means the intentional diversion of waste streams from any portion of a treatment works.
- b. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless the permittee affirmatively demonstrates that:
- (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
 - (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime or preventive maintenance; and
 - (3) The permittee submitted notices as required under Permit Condition IX.22.b. of this permit.
- c. If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the Department, if possible at least 10 days before the date of the bypass. The permittee shall submit notice of an unanticipated bypass within 24 hours of learning about the bypass as required in Permit Condition IX.20. of this permit. A notice shall include a description of the bypass and its cause; if the bypass has not been corrected, the anticipated times; and the measures planned to reduce, eliminate, and prevent recurrence of the bypass.
- d. The Department shall approve an anticipated bypass, after considering its adverse effect, if the permittee demonstrates that it will meet the three conditions listed in Permit Condition IX.22.a.1 through 3 of this permit.
- e. A permittee may allow any bypass to occur which does not cause reclaimed water or effluent limitations to be exceeded if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Permit Condition IX.22.a. through c. of this permit.

[62-620.610(22)]

23. Upset Provisions.

- a. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based effluent limitations because of factors beyond the reasonable control of the permittee.
- (1) An upset does not include noncompliance caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, careless or improper operation.
 - (2) An upset constitutes an affirmative defense to an action brought for noncompliance with technology based permit effluent limitations if the requirements of upset provisions of Rule 62-620.610, F.A.C., are met.
- b. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
- (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated;
 - (3) The permittee submitted notice of the upset as required in Permit Condition IX.5. of this permit; and
 - (4) The permittee complied with any remedial measures required under Permit Condition IX.5. of this permit.
- c. In any enforcement proceeding, the burden of proof for establishing the occurrence of an upset rests with the permittee.
- d. Before an enforcement proceeding is instituted, no representation made during the Department review of a claim that noncompliance was caused by an upset is final agency action subject to judicial review.

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed mail this report to: Department of Environmental Protection, Wastewater Compliance Evaluation Section, MS 3551, 2600 Blair Stone Road, Tallahassee, FL 32399-2400

PERMITTEE NAME: Florida Power & Light (FPL)
 MAILING ADDRESS: 6501 S. Ocean Drive
 Jensen Beach, Florida 34957

PERMIT NUMBER: FL0002208-011-IW1S

LIMIT:
 CLASS SIZE:
 MONITORING GROUP NUMBER:
 MONITORING GROUP DESCRIPTION:

Final
 MA
 D-001
 REPORT FREQUENCY: Monthly
 PROGRAM: Industrial
 Condenser once-through cooling water and auxiliary equipment cooling water from Units 1 and 2 to the discharge canal thence the Atlantic Ocean.

FACILITY: St. Lucie Plant Units 1 and 2
 LOCATION: Hutchinson Island, FL

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: _____

COUNTY: St. Lucie
 OFFICE: Southeast District

To: Replace "Curves" with "Logs"

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
Flow	Sample Measurement							
PARM Code 50050 1 Mon. Site No. FLW-1	Permit Requirement	Report (Day.Max.)	MGD				Hourly	Pulp Curves
Temperature (F), Water (During Normal Operation)	Sample Measurement							
PARM Code 00011 1 Mon. Site No. EFF-2	Permit Requirement			Report (Day.Max.)	Deg F		Hourly	Recorder
Temperature (F), Water (During Maintenance Activities)	Sample Measurement							
PARM Code 00011 Q Mon. Site No. EFF-2	Permit Requirement			117 (Day.Max.)	Deg F		Hourly	Recorder
Temp. Diff. between Intake and Discharge (During Normal Operation)	Sample Measurement							
PARM Code 61576 1 Mon. Site No. EFF-2	Permit Requirement			30 (Day.Max.)	Deg F		Hourly	Calculated
Temp. Diff. between Intake and Discharge (During Maintenance Activities)	Sample Measurement							
PARM Code 61576 Q Mon. Site No. EFF-2	Permit Requirement			32 (Day.Max.)	Deg F		Hourly	Calculated
Oxidants, Total Residual	Sample Measurement							
PARM Code 34044 1 Mon. Site No. EFF-2	Permit Requirement			0.1 (Mo.Avg.)	0.1 (Day.Max.)	mg/L	Continuous	Recorder
Chlorination Duration	Sample Measurement							
PARM Code 78739 1 Mon. Site No. EFF-1	Permit Requirement				120 (Day.Max.)	min	Daily; 24 hours	Logs

Provide entries for both U-1 and U-2

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed mail this report to: Department of Environmental Protection, Wastewater Compliance Evaluation Section, MS 3551, 2600 Blair Stone Road, Tallahassee, FL 32399-2400

PERMITTEE NAME: Florida Power & Light (FPL)
 MAILING ADDRESS: 6501 S. Ocean Drive
 Jensen Beach, Florida 34957

PERMIT NUMBER: FL0002208-011-IW1S

LIMIT: Final
 CLASS SIZE: MA
 MONITORING GROUP NUMBER: I-003
 MONITORING GROUP DESCRIPTION: Liquid radiation waste discharge to the discharge canal to the Atlantic Ocean.

REPORT FREQUENCY: Annually
 PROGRAM: Industrial

FACILITY: St. Lucie Plant Units 1 and 2
 LOCATION: Hutchinson Island, FL

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: _____

COUNTY: St. Lucie
 OFFICE: Southeast District

Delete duplicate "to the discharge"

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
Oil and Grease	Sample Measurement							
PARM Code 00556 P Mon. Site No. OUI-1	Permit Requirement			15.0 (Mo.Avg.)	20.0 (Day.Max.)	mg/L	Annually	Grab

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

Enclosure 4

FPL Check Payable to the State of Florida, Department of Environmental
Protection in the Amount of \$250.00 for the Application Fee

(1 page)