

## **PMTurkeyCOLPEM Resource**

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**From:** Comar, Manny  
**Sent:** Monday, March 05, 2012 3:50 PM  
**To:** TurkeyCOL Resource  
**Subject:** FW: RAI Letter 51 Related to ITAAC for Turkey Point Units 6 and 7 COL Application  
**Attachments:** TP RAI 6290 SRP 14.03 Ltr 51 ML12033A133.pdf

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**From:** Habib, Donald  
**Sent:** Thursday, February 02, 2012 2:44 PM  
**To:** Anderson, Brian; Comar, Manny; Galletta, Thomas; Goldstein, Kay; Hughes, Brian; Joshi, Ravindra; McGovern, Denise; Minarik, Anthony; Sebrosky, Joseph; RidsAcraAcnw\_MailCTR Resource; RidsNroDnrlNwe1 Resource; RidsNroLAKGoldstein Resource; RidsOgcMailCenter Resource; RidsRgn2MailCenter Resource; Weisman, Robert; Tonacci, Mark; Jones, Andrea; Musico, Bruce  
**Subject:** FW: RAI Letter 51 Related to ITAAC for Turkey Point Units 6 and 7 COL Application

FYI

Donald C. Habib  
NRO/DNRL  
Licensing Branch 4  
301-415-1035

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**From:** Habib, Donald  
**Sent:** Thursday, February 02, 2012 2:42 PM  
**To:** orthen, Richard; Raymond Burski; Steve Franzone; STEVEN.HAMRICK; William Maher  
**Cc:** TurkeyCOL Resource  
**Subject:** RAI Letter 51 Related to ITAAC for Turkey Point Units 6 and 7 COL Application

To All:

Attached is RAI Letter 51 related to SRP Section 14.03, Inspections, Tests, Analyses, and Acceptance Criteria, for Turkey Point Units 6 and 7. The ADAMS ML accession number for the RAI is ML12033A133.

Please contact me if you have any questions related to this matter.

Donald C. Habib  
Project Manager  
U.S. Nuclear Regulatory Commission  
Office of New Reactors, DNRL/LB4  
Room T-6D14  
Washington, DC 20555  
301-415-1035  
[Donald.Habib@nrc.gov](mailto:Donald.Habib@nrc.gov)

**Hearing Identifier:** TurkeyPoint\_COL\_Public  
**Email Number:** 554

**Mail Envelope Properties** (377CB97DD54F0F4FAAC7E9FD88BCA6D080722BE9D9)

**Subject:** FW: RAI Letter 51 Related to ITAAC for Turkey Point Units 6 and 7 COL  
Application  
**Sent Date:** 3/5/2012 3:50:25 PM  
**Received Date:** 3/5/2012 3:50:26 PM  
**From:** Comar, Manny

**Created By:** Manny.Comar@nrc.gov

**Recipients:**  
"TurkeyCOL Resource" <TurkeyCOL.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1429	3/5/2012 3:50:26 PM
TP RAI 6290 SRP 14.03 Ltr 51 ML12033A133.pdf		97314

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

## TurkeyPointRAIsPEm Resource

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**From:** Habib, Donald  
**Sent:** Thursday, February 02, 2012 1:44 PM  
**To:** TurkeyPointRAIsPEm Resource  
**Subject:** REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 051 RELATED TO SRP SECTION 14.03 ITAAC FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COL APPLICATION  
**Attachments:** PTN-RAI-LTR-051.doc

**Hearing Identifier:** TurkeyPoint\_COL\_eRAIs  
**Email Number:** 62

**Mail Envelope Properties** (E3D0DF334F617344BE38EB00C881B1B36DCF265A11)

**Subject:** REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 051 RELATED TO  
SRP SECTION 14.03 ITAAC FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COL  
APPLICATION

**Sent Date:** 2/2/2012 1:43:51 PM

**Received Date:** 2/2/2012 1:44:34 PM

**From:** Habib, Donald

**Created By:** Donald.Habib@nrc.gov

**Recipients:**

"TurkeyPointRAIsPEm Resource" <TurkeyPointRAIsPEm.Resource@nrc.gov>

Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3	2/2/2012 1:44:34 PM
PTN-RAI-LTR-051.doc	49774	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

February 1, 2012

Mano K. Nazar  
Senior Vice President and Chief Nuclear Officer  
Florida Power & Light Company  
Mail Stop NNP/JB  
700 Universe Blvd  
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 051 RELATED TO  
SRP SECTION 14.03 INSPECTIONS, TESTS, ANALYSES, AND  
ACCEPTANCE CRITERIA FOR THE TURKEY POINT NUCLEAR PLANT UNITS  
6 AND 7 COMBINED LICENSE APPLICATION

Dear Mr. Nazar:

By letter dated June 30, 2009, as supplemented by letters dated August 7, 2009, September 3, 2010, and December 21, 2010, Florida Power and Light submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced passive pressurized water reactors pursuant to 10 CFR Part 52. The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If you are unable to provide a response within 30 days, please state when you will be able to provide the response. In the event the response submitted is incomplete, please indicate in the response when the complete response will be provided. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes. Your response should also indicate whether any of the information provided is to be withheld as exempt from public disclosure pursuant to 10 CFR 2.390.

If you have any questions or comments concerning this matter, you may contact me at 301-415-1035 ([donald.habib@nrc.gov](mailto:donald.habib@nrc.gov)) or you may contact the lead project manager, Manny Comar, at 301-415-3863 ([manny.comar@nrc.gov](mailto:manny.comar@nrc.gov)).

Sincerely,

**/RA/**

Donald Habib, Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-040  
52-041

Enclosure:  
Request for Additional Information

If you have any questions or comments concerning this matter, you may contact me at 301-415-1035 ([donald.habib@nrc.gov](mailto:donald.habib@nrc.gov)) or you may contact the lead project manager, Manny Comar, at 301-415-3863 ([manny.comar@nrc.gov](mailto:manny.comar@nrc.gov)).

Sincerely,

/RA/

Donald Habib, Project Manager  
Licensing Branch 4  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-040  
52-041  
eRAI Tracking No. 6290

Enclosure:  
Request for Additional Information

Distribution:

Public	BWeisman	BHughes
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AMinarik		

NRO-002

OFFICE	CQAB/BC	LB4/PM	LB4/L-PM
NAME	AJones	MComar *	DHabib *
DATE	1/19/12	1/25/12	2/1/12

\*Approval captured electronically in the electronic RAI system.

**OFFICIAL RECORD COPY**

Request for Additional Information No. 6290 Revision 3

2/1/2012

Turkey Point Units 6 and 7

Florida P and L

Docket No. 52-040 and 52-041

SRP Section: 14.03 - Inspections, Tests, Analyses, and Acceptance Criteria

Application Section: Part 10: License Condition and ITAAC

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

14.03-1

RAI 14.03.10-1.i (Supplement 1)

In RAI 14.03.10-i (August 1, 2011, Letter No. 033), the NRC requested clarification regarding (1) the 90-minute staff augmentation time in COLA Part 5 Table B-1b, and (2) the inclusion of "within 90 minutes" in three facility activation exercise ITAAC (i.e., Acceptance Criteria 8.1.1.C.1.a, 8.1.1.D.1, and 8.1.1.D.1.a) in COLA Part 10 Table 3.8-1; including whether the two are related. In its August 29, 2011, response to RAI 14.03.10-1.i, the applicant stated that the two areas are related, and that the response to this question will be provided in response to NRC RAI 13.03-5 (e-RAI 5681). In its September 30, 2011, response to RAI 13.03-5, the applicant addressed (in RAI B-6, B-7, B-8, B-9, B-11, and B-12) the 90-minute response (staff augmentation) time, stating in part that the 60-minute response time (consistent with NUREG-0654) will replace the 90-minute response time (in Table B-1b). The staff verified this change in COLA Revision 3, Table B-1b.

The applicant did not, however, address the three exercise ITAAC (identified above) in its response to RAI 13.03-5, in regard to how they relate to the changed staff augmentation time in Table B-1b from 90 minutes to 60 minutes. In COLA Revision 3, the three exercise ITAAC in Part 10 remained at 90 minutes.

Please revise ITAAC acceptance criteria 8.1.1.C.1.a, 8.1.1.D.1, and 8.1.1.D.1.a to change "90 minutes" to "60 minutes," or explain why this change is not required. If applicable, compare the ITAAC facility activation times with the existing emergency plan facility activation times in support of Units 3 and 4. The following provides suggested revisions, which include additional slight wording changes (see also, the comparable ITAAC acceptance criteria from the Vogtle COLA):

8.1.1.C.1.a: ". . . and by the TSC within 60 minutes of TSC activation."

8.1.1.D.1: ". . . and full functional operation of the TSC and EOF within 60 minutes of activation."

8.1.1.D.1.a: ". . . within 60 minutes of the initial classification of an Alert or higher."

14.03-2

RAI 14.03.10-1.f (Supplement 1)

In RAI 14.03.10-1.f (August 1, 2011, Letter No. 033), the NRC requested that the applicant submit an appropriate exemption request that addresses a Tier 1 departure from AP1000 DCD Tier 1 Table 3.1-1, to the extent that COLA Part 10 Table 3.8-1 ITAAC represent a replacement of the comparable Table 3.1-1 ITAAC. In its August 29, 2011, response to RAI 14.03.10-1.f, the applicant stated in part that a Tier 1 departure and exemption request is not appropriate because the emergency planning ITAAC



provided in COLA Part 10 Table 3.8-1 are not a replacement, but rather a supplement to the ITAAC in DCD Tier 1 Table 3.1-1. In COLA Part 7 (Departures and Exemption Requests), Revision 3, the applicant did not include an exemption request in Section B (Turkey Point 6 & 7 Exemption Requests) to address DCD Table 3.1-1. Please address the following questions:

- a. In COLA Part 7, Section A.1 (Departures That Can Be Implemented Without Prior NRC Approval), correct the Description entry for Departure Number PTN DEP 18.8-2 to read "Technical support center location," rather than "Operations support center location."
  
- b. Provide an appropriate Tier 1 departure and exemption request that removes the ITAAC in DCD Tier 1 Table 3.1-1 from the application. The Table 3.1-1 ITAAC are directly related to the Technical Support Center's (TSC's) location in the AP1000 Annex Building (i.e., the control support area). In COLA Part 7 Departure Number 18.8-2, the applicant moved the TSC from the control support area to the Turkey Point Nuclear Training Building, located outside of the Protected Areas between the control room for Units 3 & 4 and the control rooms for Units 6 & 7. The removal (departure) of the TSC from the control support area necessitates the removal (departure) of the TSC-related ITAAC in Table 3.1-1. While the requested Tier 1 departure and exemption request for DCD Table 3.1-1 represents a change in the staff's approach from what was accepted for the Vogtle and Summer combined license applications (COLAs) - which had comparable DCD TSC relocations (i.e., departures), without a Tier 1 departure and exemption request for DCD Table 3.1-1 - the change is needed for Turkey Point Units 6 & 7, in order to more accurately comply with the structure and intent of the 10 CFR Part 52 licensing paradigm. Whenever an applicant (for a COL that references a certified design) takes a departure from a facility description in the DCD, the applicant must also depart from the ITAAC for that portion of the facility design.