



FPL

~~SECURITY RELATED INFORMATION~~
~~WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390~~

June 21, 2012

L-2012-220
10 CFR 50.90

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
License Amendment Request – Cyber Security
Plan Implementation Schedule Milestones

References:

1. NRC letter to Mr. Mano Nazar, St. Lucie Plant, Units 1 and 2 - Issuance of Amendments Regarding Approval of The St. Lucie Cyber Security Plan (TAC Nos. ME4582 AND ME4583), dated August 31, 2011.
2. FPL letter to NRC L-2011-111, Response to Request for Additional Information and Submittal of Supplement to License Amendment Request for Approval of the St. Lucie/FPL Cyber Security Plan, dated April 8, 2011.

In Reference 1, the NRC issued License Amendment Nos. 160 and 211 to the Renewed Facility Operating Licenses for St. Lucie Units 1 and 2, respectively, that approved the *St. Lucie Cyber Security Plan* and associated implementation milestone schedule. The Cyber Security Plan Implementation Schedule contained in Reference 2 was utilized as a portion of the basis for the NRC's safety evaluation report provided by Reference 1. Florida Power & Light (FPL), the licensee for St. Lucie, is clarifying the scope of implementation milestone 6 in the Cyber Security Plan implementation schedule provided in Reference 2 to apply to only technical cyber security controls; therefore, in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, FPL is submitting a request for an amendment to each of the operating licenses for St. Lucie. The proposed amendment requests NRC approval of a revised milestone scope in the Cyber Security Plan implementation schedule. This submittal does not impact the Implementation Milestone 6 completion date or the *St. Lucie Cyber Security Plan* previously provided in Reference 2.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains proposed marked-up operating license pages for the Physical Protection license condition for St. Lucie to reference the change provided in this submittal. Attachment 3 contains the proposed revised operating license pages. Attachment 4 contains a change to the scope of implementation milestone 6. FPL requests that Attachments 1 (Sections 1.0, 2.0, and 3.0) and 4, which contain security-related information (SRI), be withheld from public disclosure in accordance with 10 CFR 2.390.

Attachment 1 (Sections 1, 2, and 3) and Attachment 4 to this letter contain sensitive information. Withhold from public disclosure under 10 CFR 2.390.

Upon removal of Attachment 1 (Sections 1, 2, and 3) and Attachment 4 this letter is decontrolled.
an FPL Group company

800/A
NRK

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L-2012-220
Page 2

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the changes involve no significant hazards consideration. The bases for these determinations are included in Attachment 1.

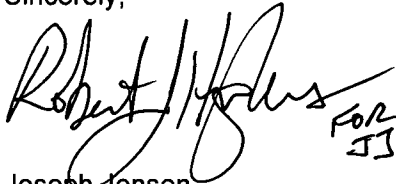
FPL requests these license amendments for St. Lucie Units 1 and 2 be effective as of their date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 31, 2012.

These changes have been reviewed by the St. Lucie Onsite Review Group. A copy of this submittal is also being sent to our appointed state official pursuant to 10 CFR 50.91.

The revised obligation contained in this submittal is summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Eric Katzman at (772) 467-7734.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2012.

Sincerely,

Handwritten signature of Robert Jensen in black ink. The signature is cursive and includes the initials 'FOR JJ' written in the bottom right corner of the signature.

Joseph Jensen
Site Vice President
St. Lucie Plant

- Attachments:
1. Evaluation of Proposed Change (contains SRI)
 2. Proposed St. Lucie Operating License Changes (Mark-up)
 3. Proposed St. Lucie Operating License Changes (Re-typed)
 4. Revised Milestone 6 of the Cyber Security Plan Implementation Schedule (contains SRI)
 5. Revised Obligation

cc: Mr. W. A. Passetti, Florida Department of Health (w/o Attachment 1 (Sections 1, 2, and 3) and Attachment 4)

St. Lucie Unit 1 Renewed Operating License Markup

- 4 -

E. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report for the facility (The fire protection program and features were originally described in FPL submittals L-83-514 dated October 7, 1983, L-83-227 dated April 12, 1983, L-83-261 dated April 25, 1983, L-83-453 dated August 24, 1983, L-83-488 dated September 16, 1983, L-83-588 dated December 14, 1983, L-84-346 dated November 28, 1984, L-84-390 dated December 31, 1984, and L-85-71 dated February 21, 1985) and as approved by NRC letter dated July 17, 1984, and supplemented by NRC letters dated February 21, 1985, March 5, 1987, and October 4, 1988, subject to the following provision:

FPL may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

F. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light & FPL Energy Seabrook Physical Security Plan, Training and Qualification Plan and Safeguards Contingency Plan - Revision 3," submitted by letter dated May 18, 2006. St. Lucie shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). St. Lucie CSP was approved by License Amendment No. 211

G. Mitigation Strategy License Condition

as supplemented by a clarification approved by License Amendment No. xxx

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel
- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment
 - 6. Training on integrated fire response strategy
 - 7. Spent fuel pool mitigation measures

St. Lucie Unit 2 Renewed Operating License Markup

- 5 -

F. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light & FPL Energy Seabrook Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan - Revision 3," submitted by letter dated May 18, 2006. St. Lucie shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). St. Lucie CSP was approved by License Amendment No. 160.

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G. Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement dated April 1982, FPL shall provide written notification to the Office of Nuclear Reactor Regulation.

as supplemented by a clarification approved by License Amendment No. xxx

H. DELETED

I. FPL shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

J. FPL shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

K. The use of ZIRLO™ clad fuel at St. Lucie Unit 2 will be subject to the following restrictions:

FPL will limit the fuel duty for St. Lucie Unit 2 to a baseline modified Fuel Duty Index (mFDI) of 600 with a provision for adequate margin to account for variations in core design (e.g., cycle length, plant operating conditions, etc). This limit will be applicable until data is available demonstrating the performance of ZIRLO™ cladding at Combustion Engineering 16x16 plants.

FPL will restrict the mFDI of each ZIRLO™ clad fuel pin to 110 percent of the baseline mFDI of 600.

For a fraction of the fuel pins in a limited number of assemblies (8), FPL will restrict the fuel duty of ZIRLO™ clad fuel pins to 120 percent of the baseline mFDI of 600.

Unit 1 Word Processed Renewed Operating License

- 4 -

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 - 5. Identification of readily-available pre-staged equipment

- 5 -

6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

- (c) Actions to minimize release to include consideration of:
1. Water spray scrubbing
 2. Dose to onsite responders

H. Control Room Habitability

Upon implementation of Amendment No. 205, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 4.7.7.1.e, in accordance with TS 6.8.4.m, the assessment of CRE habitability as required by Specification 6.8.4.m.c. (ii), and the measurement of CRE pressure as required by Specification 6.8.4.m.d, shall be considered met. Following implementation:

- (a) The first performance of SR 4.7.7.1.e, in accordance with Specification 6.8.4.m.c(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from September 2003, the date of the most recent successful tracer gas test, as stated in FPL letters to NRC dated December 9, 2003, and October 29, 2004, in response to Generic Letter 2003-01.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 6.8.4.m.c(ii), shall be within 3 years, plus the 9-month allowance of SR 4.0.2, as measured from September 2003, the date of the most recent successful tracer gas test, as stated in FPL letters to NRC dated December 9, 2003, and October 29, 2004, in response to Generic Letter 2003-01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 6.8.4.c.d, shall be within 36 months in a staggered test basis, plus the 138 days allowed by SR 4.0.2, as measured from June 30, 2006, which is the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

4. This renewed license is effective as of the date of issuance and shall expire at midnight on March 1, 2036.

FOR THE NUCLEAR REGULATORY COMMISSION

ORIGINAL SIGNED BY
J. E. Dyer, Director
Office of Nuclear Reactor Regulation

Attachments:

1. Appendix A, Technical Specifications
2. Appendix B, Environmental Protection Plan

Renewed License No. DPR-67
Amendment No. xxx
Revised by letter dated Month, Day, 2012

Unit 2 Word Processed Renewed Operating License

- 5 -

F. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light & FPL Energy Seabrook Physical Security Plan, Training and Qualification Plan and Safeguards Contingency Plan - Revision 3," submitted by letter dated May 18, 2006. St. Lucie shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The St. Lucie CSP was approved by License Amendment No. 160 as supplemented by a clarification approved by License Amendment No. xxx.

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List of Regulatory Obligations

The following table identifies those actions committed to by St. Lucie in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Obligation	TYPE		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
FPL/St. Lucie will implement milestones 1, 2, 3, 4, 5, and 7 described in Attachment 4 of FPL letter to NRC L-2011-111, Response to Request for Additional Information and Submittal of Supplement to License Amendment Request for Approval of the St. Lucie Cyber Security Plan, dated April 8, 2011, and the revised Milestone 6 in Attachment 4 of this submittal.	X		December 31, 2012