

~~This letter contains security-related information – Attachments 1 (Sections 1, 2, and 3) and 4 are withheld from public disclosure per 10 CFR 2.390~~



10 CFR 50.90
L-2012-248
June 13, 2012

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: License Amendment Request – Cyber Security
Plan Implementation Schedule Milestone Change
Turkey Point Nuclear Generating Station
Docket Nos. 50-250 and 50-251
Renewed Facility License Nos. DPR-31 and DPR-41

- References:
1. NRC letter to Florida Power & Light Company, Turkey Point Units 3 and 4 – Issuance of Amendments Regarding Cyber Security Program, dated July 29, 2011
 2. Florida Power & Light Company letter L-2011-121 to the NRC, Supplement to Request for Approval of the Turkey Point Nuclear Generating Station Cyber Security Plan: Response to Request for Additional Information, dated April 5, 2011

In Reference 1, the NRC issued license Amendment Nos. 245 and 241 to the Renewed Facility Operating Licenses (RFOL) for Turkey Point Units 3 and 4, respectively, that approved the Turkey Point Nuclear Generating Station 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 Company (FPL) is planning to implement the requirements of implementation schedule milestone 6 in a slightly different manner than described in the approved implementation schedule. Although no change to the implementation schedule date is proposed, the change to the description of the milestone 6 activity is conservatively considered to be a change to the implementation schedule, and in accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, FPL is submitting this request for an amendment to the RFOLs for Turkey Point Nuclear Generating Station. The Turkey Point Nuclear Generating Station Cyber Security Plan was previously provided in Reference 2.

~~This letter contains security-related information – Attachments 1 (Sections 1, 2, and 3) and 4 are withheld from public disclosure per 10 CFR 2.390~~

Florida Power & Light Company
9760 SW 344th St., Homestead, FL 33035

S001A
HR

~~This letter contains security-related information – Attachments 1 (Sections 1, 2, and 3) and 4 are withheld from public disclosure per 10 CFR 2.390~~

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 Turkey Point Nuclear Generating Station to reference the change provided in this submission. 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.

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.

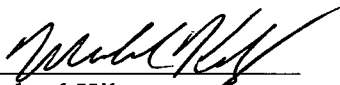
FPL requests this license amendment be effective as of its date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 31, 2012.

These changes have been reviewed by the Turkey Point Plant Nuclear Safety Committee. A copy of this submission is also being sent to our appointed state official pursuant to 10 CFR 50.91.

The revised obligation contained in this submission is summarized in Attachment 5. Should you have any questions concerning this letter, or require additional information, please contact Mr. Robert Tomonto at 305-246-7327.

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

6/13/12
Executed on


Michael Kiley
Vice President, Turkey Point Nuclear Generating Station

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

cc: Regional Administrator, USNRC, Region II
Senior Resident Inspector, USNRC, Turkey Point

~~This letter contains security-related information – Attachments 1 (Sections 1, 2, and 3) and 4 are withheld from public disclosure per 10 CFR 2.390~~

Attachment 2

L-2012-248

**Proposed Turkey Point Nuclear Generating Station
Renewed Facility Operating License Changes**

(Mark-up)

(2 pages follow)

D. 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 (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluations dated February 25, 1994, February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999, subject to the following provision:

The licensee 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.

- E. 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.

The licensee 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 Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 245.

- F. 1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.
- 2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

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

D. 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 (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluations dated February 25, 1994, February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999, subject to the following provision:

The licensee 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.

- E. 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

The licensee 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 Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 241.

- F. 1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.
- as supplemented by a change approved by License Amendment No. xxx
2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

Attachment 3

L-2012-248

**Proposed Turkey Point Nuclear Generating Station
Renewed Facility Operating License Changes
(Re-typed)
(2 pages follow)**

D. 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 (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluations dated February 25, 1994, February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999, subject to the following provision:

The licensee 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.

- E. 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.

The licensee 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 Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 245 as supplemented by a change approved by License Amendment No. xxx.

- F.
1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.
 2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

D. 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 (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluations dated February 25, 1994, February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999, subject to the following provision:

The licensee 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.

- E. 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.

The licensee 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 Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 241 as supplemented by a change approved by License Amendment No. xxx.

- F. 1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.
2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

Attachment 5

L-2012-248

Regulatory Obligation

Regulatory Obligation

The following table identifies the action committed to by Florida Power & Light Company in this document. Any other statements in this submission are provided for information purposes and are not considered to be regulatory commitments or obligations.

OBLIGATION	TYPE (Check One)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Florida Power & Light Company will implement Turkey Point Nuclear Generating Station Cyber Security Plan Implementation Schedule milestones 1, 2, 3, 4, 5, and 7 described in Enclosure 3 of FPL letter L-2011-121 dated April 5, 2011, and revised milestone 6 in Attachment 4 of this letter.	X		December 31, 2012