



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 12, 2012

Mr. Mano Nazar  
Executive Vice President and  
Chief Nuclear Officer  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

SUBJECT: TURKEY POINT NUCLEAR GENERATING PLANT, UNIT NOS. 3 AND 4 -  
CLOSEOUT OF BULLETIN 2011-01, "MITIGATING STRATEGIES"  
(TAC NOS. ME6494 AND ME6495)

Dear Mr. Nazar:

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The purpose of the bulletin was to obtain a comprehensive verification that licensees' mitigating strategies to maintain or restore core cooling, spent fuel cooling, and containment following a large explosion or fire were compliant with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(hh)(2).

The bulletin required two sets of responses pursuant to the provisions of 10 CFR 50.54(f). Florida Power and Light Company, the licensee for Turkey Point Nuclear Generating Plant, Unit Nos. 3 and 4 (Turkey Point), provided its responses to the bulletin by letters dated June 10 and July 8, 2011 (ADAMS Accession Nos. ML11172A191 and ML11203A015, respectively). By letter dated December 5, 2011 (ADAMS Accession No. ML11334A001), the NRC sent the licensee a request for additional information (RAI) on its July 8, 2011, response. The licensee responded to the RAI by letter dated January 4, 2012 (ADAMS Accession No. ML12018A240).

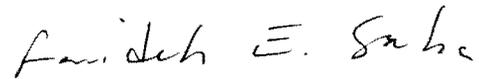
The NRC staff has reviewed the information submitted by the licensee for Turkey Point and verified that the licensee provided the information requested in the Bulletin 2011-01. The NRC staff concluded that the licensee's response to the bulletin is acceptable. The staff evaluation of the licensee's responses to Bulletin 2011-01 is summarized in the enclosure to this letter. No further information or action under the bulletin is requested.

M. Nazar

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If you have any questions regarding this letter, please contact me at (301) 415-1447.

Sincerely,

A handwritten signature in black ink that reads "Farideh E. Saba". The signature is written in a cursive style with a clear, legible font.

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure:  
Summary of NRC Bulletin 2011-01 Response Review

cc w/encl: Distribution via ListServ

SUMMARY OF NRC BULLETIN 2011-01.

"MITIGATING STRATEGIES" RESPONSE REVIEW

TURKEY POINT NUCLEAR GENERATING PLANT, UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The bulletin required two sets of responses pursuant to the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f). The first responses were due 30 days after issuance of the bulletin.

By letter dated June 10, 2011 (ADAMS Accession No. ML11172A191), Florida Power and Light Company (FPL), the licensee for Turkey Point Nuclear Generating Plant, Unit Nos. 3 and 4 (Turkey Point) provided its response to this first set of questions (first response). The second responses were due 60 days after issuance of the bulletin. By letter dated July 8, 2011 (ADAMS Accession No. ML11203A015), the licensee provided its response to this second set of questions (second response). By letter dated December 5, 2011 (ADAMS Accession No. ML11334A001), the NRC sent a request for additional information (RAI) on the second response. The licensee responded to the RAI by letter dated January 4, 2012 (ADAMS Accession No. ML12018A240). As summarized below, the NRC staff has verified that FPL provided the information requested in the bulletin.

1.0 BACKGROUND

On February 25, 2002, the NRC issued EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures" (ICM Order). Section B.5.b of the ICM Order required licensees to develop specific guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities using readily available resources (equipment and personnel) that can be effectively implemented under the circumstances associated with the loss of large areas of the plant due to explosions or fire.

By letter dated August 2, 2007 (ADAMS Accession No. ML072120170), the NRC staff issued its Safety Evaluation (SE) to document the final disposition of information submitted by Turkey Point regarding Section B.5.b of the ICM Order. Along with the SE, the staff issued a conforming license condition to incorporate the B.5.b mitigating strategies into the licensing basis.

On March 27, 2009, the NRC issued 10 CFR 50.54(hh)(2) as a new rule, in order to capture the B.5.b mitigating strategies and related license conditions as regulatory requirements for both current and future licensees. At that time, licensee compliance with the conforming license

Enclosure

conditions was sufficient to demonstrate compliance with 10 CFR 50.54(hh)(2) (74 FR 13926), therefore no further actions were required on the part of current licensees.

## 2.0 THIRTY-DAY REQUEST

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), Bulletin 2011-01 requested that licensees address the following two questions within 30 days of issuing the bulletin:

1. Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?
2. Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

The NRC staff reviewed the licensee's first response dated June 8, 2012, to determine if it had adequately addressed these questions.

### 2.1 Question 1: Availability and Capability of Equipment

The licensee confirmed in its response that the equipment it needs to execute the 10 CFR 50.54(hh)(2) mitigating strategies is available and capable of performing its intended function. The NRC staff verified that this confirmation covered equipment needed for each of the three phases of B.5.b mitigation strategies. Therefore, the NRC staff finds that the licensee has adequately responded to Question 1.

### 2.2 Question 2: Guidance and Strategies Can Be Executed

The licensee confirmed in its response that the guidance and strategies it has implemented for 10 CFR 50.54(hh)(2) are capable of being executed considering the current facility configuration, staffing levels, and staff's skills. Since the licensee has considered its current facility configuration, staffing levels, and staff's skills, and confirmed that it can execute its implemented guidance and strategies, the NRC staff finds that the licensee has adequately responded to Question 2.

## 3.0 SIXTY-DAY REQUEST

The bulletin required a response to the following five questions within 60 days of issuing the bulletin:

1. Describe in detail the maintenance of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed.
2. Describe in detail the testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it will function when needed.

3. Describe in detail the controls for ensuring that the equipment is available when needed.
4. Describe in detail how configuration and guidance management is ensured so that strategies remain feasible.
5. Describe in detail how you ensure availability of offsite support.

The NRC staff reviewed the licensee's submittals to determine if it had adequately addressed these questions. This was accomplished by verifying that the submittals listed equipment, training, and offsite resources that were relied upon to make conclusions in the August 2, 2007, SE or are commonly needed to implement the mitigating strategies.

### 3.1 Questions 1 and 2: Maintenance and Testing of Equipment

Questions 1 and 2 of the 60-day request required licensees to describe in detail the maintenance and testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed. In its second response, the licensee listed the equipment used to support the 10 CFR 50.54(hh)(2) mitigating strategies that receives maintenance or testing. For each item, the licensee described the maintenance and testing performed, including the frequency and basis for the maintenance or testing activity.

The NRC staff verified that the licensee listed equipment that typically requires maintenance or testing that was relied upon to make conclusions in the SE or commonly needed to implement the mitigating strategies. In its second response, FPL stated that the portable pump, hoses, and satellite phones receive maintenance or testing. FPL did not identify maintenance or testing of monitor nozzles, spray nozzles, or similar devices in its second response. In its RAI response, the licensee for Turkey Point stated that monitor and spray nozzles are checked quarterly for signs of corrosion or damage, but are not routinely tested. FPL also described the testing of its radio communications equipment in its RAI response. The NRC staff noted that the fuel level for the portable pump is verified during maintenance. FPL also identified other items that support the mitigating strategies that receive maintenance or testing.

The NRC staff verified that the licensee described the process used for corrective actions and listed the testing performed to ensure that the strategies were initially feasible. FPL stated in its second response that its 10 CFR Part 50, Appendix B, corrective action program is used to document equipment failure, establish priorities, and perform trending.

Based upon the information above, the NRC staff finds that the licensee has provided the information requested by Questions 1 and 2.

### 3.2 Question 3: Controls on Equipment

Question 3 of the 60-day request required licensees to describe in detail the controls on equipment, such as inventory requirements, to ensure that the equipment is available when needed. A list of inventory deficiencies and associated corrective actions to prevent loss was also requested.

The NRC staff verified that the licensee for Turkey Point described its process for ensuring that B.5.b equipment will be available when needed. In its second response, the licensee identified equipment included in its inventory, the inventory frequency, storage requirements, and items verified. Items verified include proper quantity and location of equipment. FPL states that at the time of its second response there were no outstanding inventory deficiencies that would render the strategies not viable.

The NRC staff verified that the licensee inventoried equipment which was relied upon to make conclusions in the SE or commonly needed to implement the mitigating strategies. In its second response, FPL stated that procured nonpermanently installed B.5.b equipment is inventoried at least quarterly in accordance with station procedures. The second response specifically states that the following items are included in the inventory: portable pump; pick-up truck; hoses; communications equipment; and connectors. FPL also identified other items that support the mitigating strategies that are inventoried.

Based upon the information above, the NRC staff finds that the licensee for Turkey Point has provided the information requested by Question 3.

### 3.3 Question 4: Configuration and Guidance Management

Question 4 of the 60-day request required licensees to describe in detail how configuration and guidance management is assured so that the strategies remain feasible.

The NRC staff verified that the licensee for Turkey Point described its measures to evaluate plant configuration changes for their effects on the mitigating strategies and to ensure its procedures are current. In its second response, the licensee stated that the mitigation strategies are incorporated in plant licensing, design change, and configuration control processes. The mitigating strategies are maintained in living documents, which ensures they remain current.

The NRC staff verified that the licensee described measures it has taken to validate the procedures or guidelines developed to support the mitigating strategies. In its second response, the licensee identified testing in response to Question 2 that demonstrated the ability to execute some strategies. FPL also states that "initially, mitigating strategies were validated by walkdowns, engineering evaluations, and/or table top reviews" and they were similarly revalidated in 2011.

The NRC staff verified that the licensee described the training program implemented in support of the mitigating strategies and how its effectiveness is evaluated. In its second response, the licensee identified the training provided to its operations personnel, emergency preparedness personnel, security personnel, fire brigade, and other personnel. FPL also identified the frequency with which each type of training is provided and the methods for training evaluating.

Based upon the information above, the NRC staff finds that the licensee for Turkey Point has provided the information requested by Question 4.

### 3.4 Question 5: Offsite Support

Question 5 of the 60-day request required licensees to describe in detail how offsite support availability is assured.

The NRC staff verified that the licensee for Turkey Point listed the offsite organizations it relies upon for emergency response, including a description of agreements and related training. The NRC staff compared the list of offsite organizations that the licensee provided in its second response with the information relied upon to make conclusions in the SE. FPL stated that it maintains technical support agreements with these offsite organizations, which are reviewed annually, and that these agreements were current at the time of its second response. FPL also described the training and site familiarization it provides to these offsite organizations. FPL stated that it revalidated these agreements in 2011 and did not find any lapsed agreements.

Based upon the information above, the NRC staff finds that the licensee for Turkey Point has provided the information requested by Question 5.

### 4.0 CONCLUSION

As described above, the NRC staff has verified that the licensee for Turkey Point has provided the information requested in Bulletin 2011-01. Specifically, the licensee responded to each of the questions in the bulletin as requested. The NRC staff concludes that the licensee has completed all of the requirements of the bulletin and no further information or actions under the bulletin are needed.

M. Nazar

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If you have any questions regarding this letter, please contact me at (301) 415-1447.

Sincerely,

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Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure:  
Summary of NRC Bulletin 2011-01 Response Review

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