

## **PMTurkeyCOLPEm Resource**

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**From:** Orthen, Richard [Richard.Orthen@fpl.com]  
**Sent:** Wednesday, February 06, 2013 8:48 AM  
**To:** Williamson, Alicia; Matthews, David; Nguyen, John-Chau; Maher, William; Comar, Manny; Hoeg, Tim; McCree, Victor  
**Subject:** L-2013-050 dated 06FEB13: Response to NRC RAI Letter 120830 (eRAI 6353 Rev. 2; 9.3.1-1) ESRP Section 9.3.1 - Alternative Site Selection Process  
**Attachments:** L-2013-050 Dated 06FEB13 Response to eRAI 6353 9.3.1-1.pdf

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

Re: Florida Power & Light Company  
Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
Response to NRC Request for Additional Information Letter 120830  
(eRAI 6353 Rev. 2) Related to ESRP Section 9.3.1 – Alternative Site Selection

### References:

1. NRC Letter to FPL dated August 30, 2012, Environmental Request for Additional Information Letter 120830 Related to ESRP Section 9.3.1, Alternative Site Selection, for the Combined License Application Review for Turkey Point Units 6 and 7
2. FPL Letter L-2012-369 to NRC dated October 15, 2012, Schedule for Response to NRC Request for Additional Information Letter 120830 (eRAI 6353 Rev. 2) Related to ESRP Section 9.3.1 – Alternative Site Selection Process
3. FPL Letter L-2013-008 to NRC dated January 10, 2013, Revised Schedule for Response to NRC Request for Additional Information Letter 120830 (eRAI 6353 Rev. 2) Related to ESRP Section 9.3.1 – Alternative Site Selection Process

Florida Power & Light Company (FPL) provides, as an attachment to this letter, its response to the Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI) EIS 9.3.1-1 provided in Reference 1. The schedule for this response was provided by FPL in References 2 and 3. The attachment identifies changes that will be made in a future revision of the Turkey Point Units 6 and 7 Combined License Application (if applicable).

*Richard F. Orthen*  
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**Subject:** L-2013-050 dated 06FEB13: Response to NRC RAI Letter 120830 (eRAI 6353 Rev. 2; 9.3.1-1) ESRP Section 9.3.1 - Alternative Site Selection Process  
**Sent Date:** 2/6/2013 8:47:37 AM  
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**From:** Orthen, Richard

**Created By:** Richard.Orthen@fpl.com

**Recipients:**

"Williamson, Alicia" <Alicia.Williamson@nrc.gov>  
Tracking Status: None  
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Tracking Status: None  
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Tracking Status: None  
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L-2013-050  
10 CFR 52.3

February 6, 2013

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

Re: Florida Power & Light Company  
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Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
L-2013-50 Page 2 of 2

If you have any questions, or need additional information, please contact me at 561-691-7490.

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

Executed on February 6, 2013.

Sincerely,



William Maher  
Senior Licensing Director – New Nuclear Projects

WDM/RFO

Attachment: FPL Response to NRC RAI EIS 9.3.1-1 (eRAI 6353 Rev. 2)

cc:

PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO  
Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Units 3 & 4

**NRC RAI Letter No. 120830 Dated August 30, 2012**

**SRP Section: EIS 9.3.1 – Alternative Site Selection Process**

Question from Environmental Projects Branch 1 (EPB1)

**NRC RAI Number: EIS 9.3.1-1 (eRAI 6353)**

Please clarify whether or not the Augmented Site Selection Report supersedes the screening analyses in the ER. If only portions of the analyses in the ER are superseded, explain which portions are superseded and which are not.

Background. (FPL Response to NRC RAI No. 9.3.1-14; RAI 5588, L-2011-378 Dated 9/13/11: Response to NRC Environmental RAI Letter 1104071, Attachment 2). This response says "The regional screening process mentioned in the ER is superseded by a regional screening/candidate area identification process documented in the Augmentation Report (Reference 1)." However, the Augmented Site Selection Study Report (AA) dated August 2011, page 3 states "The AA does not supersede or replace analyses in the original Siting Report."

**FPL RESPONSE:**

Analyses presented in the Augmentation Report (Reference 1) are consistent in their entirety with material submitted in Section 9.3 of Revision 3 of the Turkey Point Units 6 & 7 Environmental Report (Reference 2). Revision 3 of ER Section 9.3 (submitted as part of Reference 2) supersedes in its entirety all previous revisions of Section 9.3. The Augmentation Report supplements the 2006 Siting Report for purposes of satisfying NRC guidance on consideration of alternate sites, but does not replace the 2006 report as documentation of decision processes executed at that time.

The Augmentation Report and ER Section 9.3, Rev 3., provide the complete basis for satisfying applicable NRC and National Environmental Policy Act (NEPA) analysis of alternative sites for the Turkey Point Units 6 & 7 COL application.

As noted in its response to NRC RAI No. EIS 9.3.1-2; eRAI 5588 (Reference 1), FPL completed the Augmentation Report and conforming sections of ER 9.3, in part to "Address FPL's additional understanding of NRC guidance (NUREG-1555, Section 9.3) for the consideration of alternative sites subsequent to publication of the original 2006 Siting Report." FPL notes that these responses reflect the site selection decision *as it was conducted in 2006, when actual decisions were being made about the siting of a new nuclear power plant*, as is required under NEPA. FPL's Augmentation Report and ER Section 9.3, Rev. 3 do not address a re-consideration of the siting decision in terms of conditions existing in 2011, as this perspective is neither reflective of the real conditions surrounding plant site selection decisions and actions, nor is it consistent with the substance or intent of early planning under NEPA (40 CFR 1501.2).

This response is PLANT SPECIFIC.

Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
FPL Response to NRC RAI No. 9.3.1-1 (eRAI 6353 Rev. 2)  
L-2013-050 Attachment Page 2 of 2

**References:**

Reference 1: Florida Power & Light Company, Turkey Point 6 & 7, *New Nuclear Power Generation (Formerly Project Bluegrass) Augmented Site Selection Study Report*, August 2011. Enclosed with FPL Letter to NRC L-2011-336 dated September 1, 2011, Response to NRC Environmental Request for Additional Information Letter 1104071 (eRAI 5588) Environmental Standard Review Plan Section 9.3.1 – Alternative Site Selection Process.

Reference 2: FPL – Turkey Point Units 6 & 7 COLA (Part 3 – Environmental Report), Revision 3, December 16, 2011. NRC Accession Number ML11362A171.

**ASSOCIATED COLA REVISIONS:**

No COLA changes have been identified as a result of this response.

**ASSOCIATED ENCLOSURES:**

None