

October 9, 2013

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

SUBJECT: ENVIRONMENTAL REQUEST FOR ADDITIONAL INFORMATION LETTER
131009 RELATED TO ENVIRONMENTAL STANDARD REVIEW PLAN
SECTION 9.3 ALTERNATIVE SITES, FOR THE COMBINED LICENSE
APPLICATION REVIEW FOR TURKEY POINT, UNITS 6 AND 7

Dear Mr. Nazar:

By letter dated June 30, 2009, as supplemented by letters dated August 7, 2009, September 3, 2010, December 21, 2010, and December 16, 2011, Florida Power and Light Company (FPL) submitted its application to the U.S. Nuclear Regulatory Commission (NRC) for combined licenses (COLs) for two AP1000 advanced passive pressurized water reactors in accordance with the requirements contained in Title 10 *Code of Federal Regulations* (CFR) Part 52, "Licenses, Certifications and Approvals for Nuclear Power Plants." The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion regarding the environmental impacts of the proposed action.

The NRC staff has identified that additional information is needed to continue portions of the environmental 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 45 days of the date of this letter. If you are unable to provide a response within 45 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 COL application, 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.

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If you have any questions or comments concerning this matter, you may contact me at 301-415-1878 or via e-mail at Alicia.Williamson@nrc.gov.

Sincerely,

/RA/

Alicia Williamson, Environmental Project Manager
Environmental Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos.: 52-040, 52-041

Enclosure:
As stated

If you have any questions or comments concerning this matter, you may contact me at 301-415-1878 or via e-mail at Alicia.Williamson@nrc.gov.

Sincerely,

/RA/

Alicia Williamson, Environmental Project Manager
Environmental Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos.: 52-040, 52-041
eRAI Tracking No. 7269

Enclosure:
As stated

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NRO-002

OFFICE	NRO/DNRL/LA	NRO/DNRL/EPB1/BC	NRO/DNRL/EPB1/PM
NAME	JHennigan	SLee*	AWilliamson*
DATE	10/8/2012	10/6/2012	10/9/2012

* Approval captured electronically in the electronic RAI system.

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Request for Additional Information
Issue Date: October 9, 2013
Application Title: Turkey Point Units 6 and 7 - Dockets 52-040 and 52-041
Operating Company: Florida P and L
Docket No. 52-040 and 52-041
Review Section: EIS 9.3 - Alternative Sites
Application Section: 9.3

QUESTIONS

1. In its June 28, 2013, letter to the US Army Corps of Engineers (USACE), FPL discusses the practicability of the three inland sites and indicates that a site that frustrates the overall purpose of the project would be impracticable. Is it FPL's position that the issues identified on pages 5 through 8 of the June 28, 2013 letter for the three inland sites lead FPL to conclude that these three sites would "frustrate the overall project purpose" as defined by FPL for the purposes of evaluating the sites under the Clean Water Act (CWA), yes or no?
2. If question 1 does not accurately state FPL's position, clarify the discussion in FPL's June 28, 2013, letter to USACE which appears to imply that the sites would frustrate the overall project purpose. A clearer explanation would assist the NRC staff in its understanding of the issues and how those issues do or do not relate to the staff's determination of whether the inland sites are reasonable alternatives for its National Environmental Policy Act (NEPA) evaluation.
3. If question 1 accurately states FPL's position, then does the information presented in the June 28, 2013 letter mean that FPL could not use these sites to build and operate two AP1000 nuclear units?
4. If the answer to question 3 is "yes," then explain how, under NEPA, the three inland sites can be considered reasonable alternatives. Regardless of the differences in the CWA and NEPA, if FPL could not use these sites to build and operate two AP1000 nuclear units then it doesn't appear that they are reasonable alternatives.
5. If the answer to 3 is "no," then explain under what circumstances, or by what means, FPL could construct a reactor at the sites despite the issues raised by FPL in its June 28, 2013, letter to USACE and FPL's conclusion that the sites are impracticable.

Supporting Information/Background: In its June 28, 2013, letter to USACE, FPL appears to imply that the three inland sites would not meet the overall project purpose, which FPL defined as to "provide baseload generating capacity in the most cost-effective manner (as required by the Florida Public Service Commission [FPSC]), while minimizing emissions of greenhouse gases, providing fuel diversity, and addressing the generation/load imbalance in Miami-Dade and Broward counties." For example, on page 5 FPL states that an alternative site is not practicable if it would "frustrate the overall project purpose," and that a "potentially licensable alternative site may not be practicable if it does not fulfill the overall project purpose." FPL then lists various issues that "contributed to the cumulative determination that the three inland sites, while viable and potentially licensable, were not practicable in light of FPL's overall project purpose." The letter never directly states that the issues identified by FPL lead to the conclusion that the inland sites would "frustrate the overall project purpose." But that appears to be the implication.

6. On page 67 of FPL's October 31, 2011, submittal to the USACE, regarding the Glades site, FPL stated, "The Glades site does not have a continuous or reliable supply of cooling water." Similar statements are made regarding the Martin and Okeechobee sites in the same report. Recognizing that FPL's position regarding cooling water supply has been evolving over the last two years, explain FPL's current position as to whether these three sites could obtain a continuous and reliable supply of cooling water. State clearly whether the 2011 statements regarding a lack of a reliable cooling water supply have been superseded by more recent FPL submittals.