



August 15, 2014  
L-2014- 244

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

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Florida Power and Light Company's, Turkey Point Units 3 and 4, Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation(Order Number EA-12-051)

References:

1. U.S. Nuclear Regulatory Commission, Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately), dated March 12, 2012 ML 12056A044.
2. FPL Letter, L-2013-062, Florida Power and Light Company's, Turkey Point Units 3 and 4, Overall Integrated Plan in Response to March 12, 2012 U.S. Nuclear Regulatory Commission's Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2013 ML130720690.
3. NRC Letter, Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order No. EA-12-051) (TAC Nos. MF0988 and MF0989), dated July 11, 2013, ADAMS Accession No. ML13191A134
4. FPL Letter, L-2013-225, Florida Power and Light Company's, Turkey Point Units 3 and 4 Response to Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-015 "Reliable Spent Fuel Pool Instrumentation," dated July 30, 2013, ADAMS Accession No. ML13224A160
5. FPL Letter L-2013-248, Florida Power & Light Company's Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, Accession No. ML13248A313.

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6. NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0988 and MF0989) dated November 19, 2013, Accession No. ML13280A177.
7. FPL Letter L-2014-042, Florida Power & Light Company's Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2014, Accession No. ML14073A066.
8. U.S. Nuclear Regulatory Commission, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051", dated March 26, 2014, Accession No. ML14083A620.

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees including Florida Power and Light Company's (FPL) Turkey Point. In Reference 2, FPL submitted an Overall Integrated Plan for the implementation of this Order. The NRC sent a request for additional information (RAI) (Reference 3). FPL provided supplemental information by letters L-2013-225 and L-2013-248 (Reference 4 and 5). On November 19, 2013, the NRC issued the interim Staff Evaluation (Reference 6) which also includes RAIs, response to which FPL will be providing the six-month status updates as the information becomes available. The Second 6-Month Status Report was submitted in FPL letter L-2014-042 (Reference 7). On March 26, 2014, the NRC issued an audit plan to review Licensee submittals (Reference 8) by synchronizing the NRC's reviews to the site's compliance date.

The purpose of this letter is to provide the Third Six-month Status Report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1 and to update the status of RAIs. The enclosure to this letter provides a status update since the last report of milestone accomplishments, any changes to the compliance method, and schedule.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Turkey Point Licensing Manager, at 305-246-7327.

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on August 15, 2014

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Kiley", written in a cursive style.

Michael Kiley  
Site Vice President  
Turkey Point Nuclear Plant

Enclosure

cc: USNRC Regional Administrator, Region II  
USNRC Project Manager, Turkey Point Nuclear Plant  
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant

**L-2014-244**

**ENCLOSURE**

**FLORIDA POWER & LIGHT COMPANY'S  
TURKEY POINT UNITS 3 and 4  
THIRD SIX MONTH STATUS REPORT IN RESPONSE TO  
MARCH 12, 2012 COMMISSION ORDER TO MODIFY LICENSES  
WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION  
(ORDER NUMBER EA-12-051)**

## 1. Introduction

Florida Power & Light Company's (FPL) Turkey Point Units 3 and 4 developed an Overall Integrated Plan (OIP) (Reference 1) documenting the modification with regard to reliable Spent Fuel Pool (SFP) instrumentation in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

## 2. Milestone Accomplishments

Turkey Point has selected and entered into a purchase agreement to procure SFP level instruments that, when installed, will meet all the criteria designated in the Overall Integrated Plan submitted on February 26, 2013 (Reference 1). Currently, the modification package for the selected equipment is approximately 50% complete.

## 3. Milestone Schedule Status

The Milestone Schedule is being revised. The Unit 3 Refueling Outage has been rescheduled from the 2<sup>nd</sup> to the 4<sup>th</sup> quarter of 2015 due to the Extended Power Uprate Refueling Outage. Completion of the Engineering Design for Unit 3 is forecasted for the 4<sup>th</sup> quarter of 2014. For Unit 3, the milestones for the Installation of the SFP Instruments, and the Instruments Operation and Training will be completed by the 4<sup>th</sup> quarter of 2015, consistent with the completion of the Unit 3 outage. For Unit 4, the milestone for Complete Installation of SFP Instruments is revised to 2<sup>nd</sup> quarter 2016, to be consistent with the completion of the Unit 4 outage.

These changes will not impact achieving compliance with Attachment 2 of Order EA-12-051 to complete full implementation no later than the second refueling outage after submittal of the OIP. The revised milestone target completion dates (shown in bold) are as follows:

Milestones	Target Completion Date	Activity Status	Revised Target Completion Date
Commence Engineering and Design-Unit 3	1Q 2013	Complete	NA
Complete Engineering Design-Unit 3	3Q 2014	Started	<b>4Q 2014</b>
Complete Procurement of SFP Instruments- Unit 3	4Q 2014	Started	N/A
Complete Installation of SFP Instruments-Unit 3	1Q 2015	Not started	<b>4Q 2015</b>
Instruments Operational and Training –completed- Unit 3	1Q 2015	Not started	<b>4Q 2015</b>
Commence Engineering and Design-Unit 4	1Q 2013	Complete	NA
Complete Design-Unit 4	3Q 2015	Started	NA
Complete Procurement of SFP Instruments - Unit 4	4Q 2015	Started	NA
Complete Installation of SFP Instruments- Unit 4	1Q 2016	Not Started	<b>2Q 2016</b>
Instruments Operational and Training completed- Unit 4	2Q 2016	Not Started	NA

#### 4. Changes to Compliance Method

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 1). Consistent with the requirements of Order EA-12-051 and the Order guidance documents, the six month reports will delineate any proposed changes to compliance methods.

#### 5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

FPL is not requesting relief from the requirements of Order EA-12-051 (Reference 2) or guidance document JLD-ISG-2012-03 (Reference 4) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 2) and the guidance in NEI 12-02 (Reference 5), the six month reports will delineate progress made, any proposed changes in compliance methods, updates to the schedule, and if needed, requests for relief and their bases.

#### 6. Requests for Additional Information

The Turkey Point Interim Staff Evaluation (ISE) with Request for Additional Information (RAI) was issued on November 19, 2013 (Reference 6). Responses to RAI 12 and 13 were provided in L-2014-042 (Reference 7). In Reference 8, the NRC requested FPL to place the response to the remaining ISE RAIs on the e-portal by September 30, 2014. On August 12, 2014, FPL notified the NRC's Project Manager, Mr. Jason Paige, that the responses to these RAIs will be available and posted on the e-portal prior to the next six-month status update (i.e., by February 28, 2015), to support the NRC's audit process well in advance to site's compliance date.

The following table provides a summary of the status of the RAIs received on November 19, 2013 (Reference 6). The Engineering Design for Unit 3 is scheduled to be completed in the 4<sup>th</sup> quarter of 2014. The RAI responses showing "To be provided by 2/28/2015" require design information that is currently being developed in the engineering and design documents specific to the Turkey Point SFP instrument installation.

RAI	Status
RAI – 1	To be provided by 2/28/2015
RAI – 2 a, b, c	To be provided by 2/28/2015
RAI – 3	To be provided by 2/28/2015
RAI – 4	To be provided by 2/28/2015
RAI – 5 a, b, c	To be provided by 2/28/2015
RAI – 6	To be provided by 2/28/2015
RAI – 7 a, b	To be provided by 2/28/2015
RAI – 8 a, b	To be provided by 2/28/2015
RAI – 9 a, b	To be provided by 2/28/2015
RAI – 10 a, b, c, d	To be provided by 2/28/2015
RAI – 11 a, b	To be provided by 2/28/2015
RAI – 12	Response provided in L-2014-042 (Reference 7)
RAI – 13 a, b, c	Responses provided in L-2014-042 (Reference 7)

## 7. References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

- (1) FPL Letter L-2013-062, dated February 26, 2013, Florida Power & Light Company's Turkey Point Units 3 and 4, Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), Accession No. ML130720690.
- (2) U.S. Nuclear Regulatory Commission, Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately), dated March 12, 2012, Accession No. ML12056A044.
- (3) FPL Letter L-2013-248, Florida Power & Light Company's Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, Accession No. ML13248A313.
- (4) U.S. Nuclear Regulatory Commission, Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012, Accession No. ML12221A339.
- (5) NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" dated August, 2012, Accession No. ML12240A307.
- (6) NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0988 and MF0989) dated November 19, 2013, Accession No. ML13280A177.
- (7) FPL Letter L-2014-042, Florida Power & Light Company's Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2014, Accession No. ML14073A066.
- (8) U.S. Nuclear Regulatory Commission, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051", dated March 26, 2014, Accession No. ML14083A620.