



August 27, 2014

L- 2014-275  
10 CFR 2.202

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

St. Lucie Units 1 and 2  
Dockets 50-335 and 50-389

Florida Power & Light/St. Lucie 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)

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, Accession No. ML12056A044.
- (2) 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.
- (3) 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.
- (4) FPL Letter L-2012-384, dated October 25, 2012, Florida Power & Light (FPL)'s Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), Accession No. ML12300A420.
- (5) FPL Letter L-2013-079, dated February 28, 2013, Florida Power & Light/St. Lucie's 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. ML13063A026.
- (6) NRC Letter to Florida Power & Light St. Lucie Nuclear Plant, Units 1 and 2 - Request for Additional Information Regarding Overall Integrated Plan for Reliable SFP Instrumentation (Order No. EA-12-051) (TAC Nos. MF00090 and MF0091), dated July 16, 2013, Accession Number ML13196A079.
- (7) FPL Letter L-2013-223, dated July 26, 2013, Florida Power & Light/St. Lucie's Response to Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation," Accession No. ML13219A838.
- (8) FPL Letter L-2013-253, dated August 27, 2013, Florida Power & Light/St. Lucie's first Six-Month Status Report to the 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. ML13242A006.

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- (9) NRC Letter to Florida Power & Light St. Lucie Nuclear Plant, Units 1 and 2 - 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. MF0990 and MF0991) dated November 19, 2013, Accession No. ML13274A473.
- (10) FPL Letter L-2013-061, dated February 28, 2014, Florida Power & Light/St. Lucie's Second Six-Month Status Report to the 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. 14064A193.

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to FPL. Reference 1 was immediately effective and directs FPL to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the FPL initial status report regarding mitigation strategies. Reference 5 provided the FPL Overall Integrated Plan.

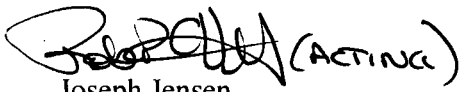
Reference 1 requires submission of a status report at six month intervals following submittal of the Overall Integrated Plan. Reference 3 provides direction regarding the content of the status reports. The first and second six month status reports were submitted in Reference 8 and 10. The purpose of 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. The enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Eric Katzman, Licensing Manager, at (772) 467-7734.

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

Executed on August 27, 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph Jensen", with the word "(ACTING)" written in parentheses to the right of the signature.

Joseph Jensen  
Site Vice President  
St. Lucie Plant

JJ/KWF

cc: USNRC Regional Administrator, Region II  
USNRC Senior Resident Inspector, St. Lucie Units 1 and 2

Enclosure:

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)

**L-2014-275**

**ENCLOSURE**

**FLORIDA POWER & LIGHT COMPANY'S  
ST. LUCIE UNITS 1 AND 2  
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) St. Lucie Units 1 and 2 developed an Overall Integrated Plan (Reference 5) documenting the modification with regard to reliable Spent Fuel Pool (SFP) instrumentation in response to Reference 1. This enclosure provides the third six-month 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

St. Lucie 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 28, 2013 (Reference 5). The equipment selected is being used throughout the NextEra fleet. The modification package for the St. Lucie Unit 1 installation is in the final approval process. The Unit 2 modification package remains on track per the milestone schedule.

## 3. Milestone Schedule Status

There currently are no changes to the Milestone Schedule provided in the Overall Integrated Plan (Reference 5). Any changes to the following target dates will be reflected in the six month updates:

The current milestones are:

|  | <u>Unit 1</u>   | <u>Unit 2</u>   |
|--|-----------------|-----------------|
| Commence Engineering and Design                | In progress     | In progress     |
| Complete Design                                | 3Q 2014         | 1Q 2015         |
| Complete Procurement of SFP Instruments        | 4Q 2014         | 2Q 2015         |
| Complete Installation of SFP Instruments       | 1Q 2015         | 3Q 2015         |
| Instruments Operational and Training completed | 2Q 2015         | 4Q 2015         |
| Required implementation date:                  | RF26<br>2Q 2015 | RF22<br>4Q 2015 |

## 4. Changes to Compliance Method

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 5). 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

St. Lucie is not requesting relief from the requirements of Order EA-12-051 (Reference 1) or guidance document JLD-ISG-2012-03 (Reference 2) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 1) and the guidance in NEI 12-02 (Reference 3), 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 NRC staff determined that additional information was required to enable the continued technical review of the FPL St. Lucie Plant's Overall Integrated Plan (OIP). Table 1 provides a summary of the status of the request for additional information that was received on November 19, 2013 (Reference 9). Responses that are identified as being "Detailed Design" in the table require detailed design information from the modification design package. The responses to these requests for information will be uploaded into CERTREC (e-portal) for NRC staff review as part of the audit process. Responses to the remaining items were included in previous six month updates (References 8 and 10).

Table 1

| <b>RAI</b>  | <b>Status</b>            |
|---|--------------------------|
| RAI-1 -- Sensing cables and routing               | Detailed Design          |
| RAI-2a, b, c -- Mounting                          | Detailed Design          |
| RAI-3 -- Seismic testing                          | Detailed Design          |
| RAI-4 -- Mounting                                 | Detailed Design          |
| RAI-5a, b, c -- Testing                           | Detailed Design          |
| RAI-6 -- Testing                                  | Detailed Design          |
| RAI-7 -- Power supply                             | Detailed Design          |
| RAI-8 -- Battery capacity                         | Detailed Design          |
| RAI-9a, b -- Instrument accuracy                  | Detailed Design          |
| RAI-10 -- Instrument accuracy                     | Detailed Design          |
| RAI-11a, b, c, d -- Testing                       | Detailed Design          |
| RAI-12 -- Personnel access                        | Detailed Design          |
| RAI-13 -- Procedures                              | Included in Reference 10 |
| RAI-14a, b, c -- Testing and compensatory actions | Included in Reference 10 |

## 7. References

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

- (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, Accession No. ML12056A044.
- (2) 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.

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- (5) FPL Letter L-2013-079, dated February 28, 2013, "Florida Power & Light/St. Lucie's 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. ML13063A026.
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- (8) FPL Letter L-2013-253, dated August 27, 2013, Florida Power & Light/St. Lucie's first Six-Month Status Report to the 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. ML13242A006.
- (9) NRC Letter to Florida Power & Light St. Lucie Nuclear Plant, Units 1 and 2 Interim Staff Evaluation and Request for Additional Information Regarding Spent Fuel Pool Instrumentation (TAC Nos. MF0990 and MF0991) dated November 19, 2013, Accession No. ML13274A473.
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