



January 7, 2015

L-2015-006

Secretary
Attn: Rulemaking and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Petition to Amend Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material: Request for Comments (Docket ID: NRC-2014-0172)

Florida Power and Light Company, the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, and its affiliates, NextEra Energy Seabrook, LLC, the licensee for the Seabrook Station, NextEra Energy Duane Arnold, LLC, the licensee for the Duane Arnold Energy Center, and NextEra Energy Point Beach, LLC, the licensee for the Point Beach Nuclear Plant, Units 1 and 2 (hereafter referred to collectively as "NextEra"), appreciates the opportunity to comment on the above listed petition (PRM-37-01), contained in NRC Docket ID NRC-2014-0172 (79 FR 64149).

NextEra endorses the petition and is in support of rulemaking to implement the changes proposed.

NextEra continues to place priority on the security of its nuclear facilities and materials and recognizes the threat of theft or diversion posed to Category 1 and Category 2 quantities of radiological materials. NextEra implements security measures consistent with existing rules and regulations as defined within 10 CFR 73, "Physical Protection of Plants and Materials," and believes that the security program in place in accordance with Part 73 meets the requirements of Part 37. Part 37 in its current form imposes duplicative and burdensome requirements affording no greater protection of Category 1 and Category 2 materials.

NextEra believes the changes proposed in the petition would have an immediate positive impact on reducing unnecessary burden. NextEra has spent in excess of \$250,000.00 including the costs for implementing, a separate and duplicative Part 37 program.

If there are any questions, or if additional information is required, please contact Mr. Mark Fencil at 561-691-7416.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Mark Fencil".

Mark Fencil
Director of Fleet Security