



L-2015-236
10 CFR 52.3
10 CFR 2.390
10 CFR 50.71(e)
10 CFR 52 Appendix D

October 14, 2015

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
Combined License Application Submittal 15
Submittal of the Annual Update of the COL Application - Revision 7
and the Semi-Annual Update of the Departures Report

References:

1. FPL Letter L-2009-144 to NRC, dated June 30, 2009, Application for Combined License for Turkey Point Units 6 and 7
2. FPL Letter L-2014-316 to NRC, dated October 29, 2014, Combined License Application Submittal 13 - Submittal of the Annual Update of the COL Application - Revision 6 and the Semi-Annual Update of the Departures Report
3. FPL Letter L-2015-117 to NRC, dated April 29, 2015, Submittal of AP1000 Combined License Application Semi-Annual Departure Report
4. FPL Letter L-2015-235 to NRC, dated September 25, 2015, Combined License Application Revision 7 - Submittal 14 Part 8B - Special Nuclear Material (SNM) Physical Protection Program Description - Revision 1

BACKGROUND

Florida Power & Light Company (FPL) submitted a Combined License (COL) Application for two AP1000 pressurized water reactor units to be located at the Turkey Point site, designated Turkey Point Units 6 and 7 (PTN 6 & 7), located in Miami-Dade County, FL on June 30, 2009. The COL Application incorporates by reference the Westinghouse AP1000 Certified Design as described in the AP1000 Design Control Document, Revision 19. The COL Application includes NRC approved standard content based on the AP1000 Design Centered Working Group Reference COL Application (RCOLA) approved in the Southern Nuclear Operating Company, Inc. (SNC) COL for the Vogtle Electric Generating Plant Units 3 and 4 issued on February 12, 2012. FPL submitted the Revision 6 annual update to the

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PTN 6 & 7 COL Application on October 29, 2014 (Reference 2). FPL submitted the most recent semi-annual update to the departures report on April 29, 2015 (Reference 3).

REVISION 7 SUMMARY

This letter provides Revision 7 to the PTN 6 & 7 COL Application. The updates provided with this letter include the submittal of the annual update of the docketed Final Safety Analysis Report (FSAR) and the semi-annual update of the Departures Report (COL Application, Part 2 and Part 7, respectively) as required by 10 CFR 50.71(e)(3)(iii) and 10 CFR Part 52, Appendix D, subsection X.B, respectively. Parts 1, 3, 4, 5, 9, 10, and 11 of the PTN 6 & 7 COL Application are also included in the Revision 7 update.

Revision 7 incorporates changes identified by previous FPL correspondence, including responses to RAIs, conforming changes to the FSAR, miscellaneous errata items, and standard and plant specific changes identified since the Revision 6 submittal. Revisions to the COL Application are identified by revision bar in the right margin for text and tables and by revision number only for figures.

SECURITY- RELATED INFORMATION – REQUEST TO BE WITHHELD FROM PUBLIC DISCLOSURE IN ACCORDANCE WITH 10 CFR 2.390

COL Application Part 9 Enclosure 5, FPL PTN 6 & 7 Cyber Security Plan (CSP), Revision 1, and COL Application Part 9 Enclosure 6, FPL PTN 6 & 7 Mitigative Strategies Description and Plans Required by 10 CFR 52.80(d), Revision 1, are designated as Security-Related Information. Accordingly, FPL requests that the Part 9 Enclosures 5 and 6 be withheld from public disclosure under 10 CFR 2.390.

PROPRIETARY INFORMATION – REQUEST TO BE WITHHELD FROM PUBLIC DISCLOSURE IN ACCORDANCE WITH 10 CFR 2.390

COL Application Part 9 Enclosure 7, AP1000 Turkey Point Site Specific Seismic Evaluation Report, TPG-1000-S2R-802, Revision 7 dated August 2015, contains Westinghouse Proprietary Class 2 information. The Westinghouse proprietary information for which withholding is being requested is further identified in the affidavit signed by Westinghouse Electric Company. The Westinghouse affidavit accompanying this letter (Enclosure 2), sets forth the basis on which the information may be withheld from public disclosure by the Commission and address with specificity the considerations listed in 10 CFR 2.390(b)(4). Correspondence with respect to the proprietary aspects of this application for withholding or the accompanying affidavit should reference CAW-15-4182 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066. Based on Enclosure 2 to this letter, FPL requests that Part 9, Enclosure 7 be withheld from public disclosure under 10 CFR 2.390(a)(4).

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STANDARD DISCLOSURES

Consistent with common licensing practice and the original FPL COL Application, most of the updated application text is written in the present tense, active voice, including discussions of facilities and programs not yet built or implemented. Exceptions to this approach are the discussions of operating experience, completed studies, and evaluations, which are written in the past tense. It should be understood, however, that statements regarding facilities (e.g., structures, systems, and components) and pre-construction, pre-operational, and operational activities (e.g., procedures and programs) typically address facilities and activities that have not yet been built or performed and will not be built or performed until it is reasonable and appropriate to do so.

FPL Letter dated April 29, 2015 discussed changes to AP1000 design certification information identified by Westinghouse in connection with AP1000 facilities under construction. These changes and others are currently being evaluated in accordance with ISG-11. FPL intends to submit a similar departure and exemption requests, if applicable, for the Turkey Point Units 6 & 7 COL Application once the NRC has completed its review of the Levy County departures and examples of these departures include:

- A departure related to changes in the AP1000 containment condensate return cooling design that had been submitted by Duke Energy Florida for the Levy County COL application, which is applicable to Turkey Point Units 6 & 7.
- A departure related to changes in the AP1000 design certification information identified by Westinghouse, which affects the calculated main control room operator dose following design basis accident scenarios for all AP1000 units. This change has been submitted by Duke Energy Florida for the Levy County COL Application, which is applicable to Turkey Point Units 6 & 7.
- A departure related to changes in the AP1000 design certification information identified by Westinghouse, which affects the calculated main control room heat-up following design basis accident scenarios for all AP1000 units. This change has been submitted by Duke Energy Florida for the Levy County COL Application, which is applicable to Turkey Point Units 6 & 7.
- A departure related to changes to AP1000 design certification information was identified by Westinghouse, which affects hydrogen venting following design basis accident scenarios for all AP1000 units. The change involves a departure from DCD Tier 1 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) as well as an associated DCD Tier 2 departure.
- A departure related to changes in the AP1000 design certification information was recently identified by Westinghouse which adds a new permissive, P-8, to permit blocking the flux doubling logic during reactor startup. This change has been submitted by Duke Energy Florida for the Levy County COL Application, which is applicable to Turkey Point Units 6 & 7.

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FPL will provide additional COLA updates, as required, prior to NRC issuance of the Final Safety Evaluation Report.

ENCLOSURE SUMMARY

Enclosure 1 of this letter provides a Revision 7 summary for each Part of the COL Application. A roadmap document identifying each change and its basis to aid to the NRC reviewers will be submitted in November 2015.

Enclosure 2, Westinghouse affidavit accompanying this letter, sets forth the basis on which the information in the Westinghouse report TPG-1000-S2R-802, Revision 7, may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4).

Enclosure 3, optical storage media (OSM), includes electronic copies of the sensitive version of the COL Application Revision 7 including Part 9, Withheld Information. Pre-submission checks have been successfully performed on the OSMs to validate and verify compliance with the standards for electronic submission in NRC Guidance Document, Guidance for Electronic Submissions to NRC, dated May 27, 2011. Each OSM includes a "packing slip" describing its contents, pursuant to NRC instructions for electronic filing.

CLOSING

This PTN 6 & 7 COL Application update contains no Restricted Data or other defense information requiring separation in accordance with 10 CFR 50.33(j).

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If you have any questions, or need additional information, please contact William Maher, Senior Licensing Director - New Nuclear Projects, at 561-904-3794.

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

Executed on October 14, 2015.

Sincerely,


Mano K. Nazar

President and Chief Nuclear Officer

MKN/GRM

Enclosure 1: Summary of COL Application Revision 7 Changes

Enclosure 2: Westinghouse Application for Withholding Proprietary Information from Public Disclosure Affidavit Pursuant to 10 CFR 2.390(a)(4)

Enclosure 3: Turkey Point Units 6 and 7 COL Application, Revision 7, Submittal 15 Sensitive Version, (3 OSMs) (Contains 10 CFR 2.390 Information)

cc: w/o Enclosure 3 OSMs

PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO

PTN 6 & 7 Environmental Project Manager, USNRC DSER/NRO

Regional Administrator, Region II, USNRC

Senior Resident Inspector, USNRC, Turkey Point Plant 3 & 4

COLA Part 9 of the Enclosure 3 OSMs contains information requested to be ~~withheld from disclosure under 10 CFR 2.390~~

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Enclosure 1

Summary of COL Application Revision 7 Changes

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The PTN 6 & 7 COL Application Revision 7 is composed of 11 Parts identified below. The revisions to the PTN 6 & 7 COL Application include: changes to standard content, updated supplemental information, miscellaneous errata items, and plant-specific changes. General plant specific updates to various COL Application Parts include GIS figure updates and corrections, and plant facility updates. The letter references for the eRAI responses incorporated into COL Application Revision 7 will be provided in the COL Application Revision 7 roadmap submittal.

Part 1 General and Financial Information

The Part 1 update includes voluntary and supplemental information and other changes including:

- Updated decommissioning cost estimates
- Updated estimated construction costs
- Updated Table 1 for names and titles of NextEra Energy, Inc. and FPL officers and directors and deleted construction cost estimate
- Updated Appendix 1A for estimated total construction cost estimate changes

Part 2 Final Safety Analysis Report (FSAR)

The Part 2 update includes changes identified by previous correspondence and other changes including:

- Chapter 1 updated Table 1.1-203 for construction schedule changes, updated Table 1.8-202 for eRAI 5695 response, and updated Tables 1.8-201 and 1.8-203 for departure 1.8-1
- Chapter 2 updated for responses to eRAIs 6432, 7804, 7811, and 7950. In addition, errata and conforming changes associated with the integration of FSAR Section 2.5 RAI response updates
- Chapter 3 updated for responses to eRAIs 6432 and 7815. Also updated in response to the NRC technical audit conducted between June 22, 2015 and June 25, 2015
- Chapter 8 updated to incorporate information for the plant response to eRAI 6750 on high voltage open phase condition
- Chapter 11 to incorporate the voluntary Radwaste Building Safety Classification Demonstration, the revised response to eRAI 5695 on liquid radwaste treatment system cost-benefit analysis, and the supplemental response to eRAI 6985 on liquid waste management systems
- Chapter 12 updated for supplemental response to RAI 11.02-6-6 and response to eRAI 5430 on construction worker ISFSI dose
- Chapter 13 updated Section 13.5.2 for the voluntary radwaste building safety classification demonstration, and minor errata corrections and Section 13.5.2 and Table 13.4-201 for changes to the SNMPPPD
- Chapter 14 updated response to eRAIs 7811 and 7815
- Chapter 19 updated Subsection 19.55.6.3, Site Specific Seismic Margin Analysis

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- Chapters 4, 5, 6, 7, 9, 10, 15, 16, 17, and 18 have no changes in COLA Revision 7

Part 3 Environmental Report

Part 3 - No changes

Part 4 Technical Specifications

Part 4 - No changes

Part 5 Emergency Plan

The Part 5 update includes voluntary and supplemental information and other changes including:

- Errata and conforming changes

Part 6 Limited Work Authorization

Part 6 was deleted in COL Application Revision 1 - No changes

Part 7 Departures and Exemption Requests

Part 7 update included the addition of departure PTN-DEP-1.8-1, Correction of an inconsistency in regulatory citation in an interface description

Part 8 Safeguards/Security Plans

Part 8 update contains safeguards information submitted under separate cover by FPL letter L-2015-235 dated September 25, 2015 (Reference 4)

Part 8A - No changes

Part 8B update includes voluntary revision of the Special Nuclear Material (SNM) Physical Protection Program Description to Revision 1

Part 9 Withheld Information

Part 9 updated for revised response to eRAI 6432 and includes proprietary version of Appendix 3KK, Westinghouse report TPG-1000-S2R-802, Revision 7

Part 10 Proposed License Conditions (including inspections, tests, analyses, and acceptance criteria [ITAAC])

Part 10 update includes voluntary and supplemental information and other changes including:

- Supplemental response to NRC eRAI 6750 on stability of offsite power systems
- Response to NRC eRAI 7815 on foundations
- Editorial change associated with RAI 02.05.04-31 on fill concrete and RAI 02.05.04-32 on engineered fill

COLA Part 9 of the Enclosure 3 OSMs contains information requested to be ~~withheld from disclosure under 10 CFR 2.390~~

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- Revised response to eRAI 7811 on stability of subsurface materials and foundations

Part 11 Enclosures

The Part 11 – No changes

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Enclosure 2

Westinghouse Application for Withholding
Proprietary Information from Public Disclosure Affidavit
Pursuant to 10 CFR 2.390(a)(4)

CAW-15-4182

(7 Total Pages)

PTN 6 & 7 COL Application Enclosure 7 of COL Application Part 9, AP1000 Turkey Point Site Specific Seismic Evaluation Report, TPG-1000-S2R-802, Revision 7, contains Westinghouse Proprietary Class 2 information.

The Westinghouse proprietary information for which withholding is being requested is further identified in the affidavit signed by Westinghouse Electric Company. The Westinghouse affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and address with specificity the considerations listed in 10 CFR 2.390(b)(4).

Correspondence with respect to the proprietary aspects of this application for withholding or the accompanying affidavit should reference CAW-15-4182 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

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PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC with the Turkey Point Site Specific Seismic Evaluation as part of an NRC RAI response and FSAR Appendix 3KK, and may be used only for that purpose.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

COPYRIGHT NOTICE

The reports transmitted herewith each bear a Westinghouse copyright notice. The NRC is permitted to make the number of copies of the information contained in these reports which are necessary for its internal use in connection with generic and plant-specific reviews and approvals as well as the issuance, denial, amendment, transfer, renewal, modification, suspension, revocation, or violation of a license, permit, order, or regulation subject to the requirements of 10 CFR 2.390 regarding restrictions on public disclosure to the extent such information has been identified as proprietary by Westinghouse, copyright protection notwithstanding. With respect to the non-proprietary versions of these reports, the NRC is permitted to make the number of copies beyond those necessary for its internal use which are necessary in order to have one copy available for public viewing in the appropriate docket files in the public document room in Washington, DC and in local public document rooms as may be required by NRC regulations if the number of copies submitted is insufficient for this purpose. Copies made by the NRC must include the copyright notice in all instances and the proprietary notice if the original was identified as proprietary.

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September 1, 2015

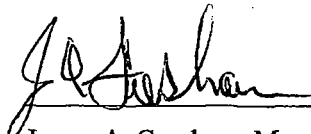
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF BUTLER:

I, James A. Gresham, am authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "J. A. Gresham", is written over a horizontal line.

James A. Gresham, Manager
Regulatory Compliance

- (1) I am Manager, Regulatory Compliance, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitute Westinghouse policy and provide the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
 - (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
 - (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
 - (f) It contains patentable ideas, for which patent protection may be desirable.
- (iii) There are sound policy reasons behind the Westinghouse system which include the following:
- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
- (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
- (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in TPG-1000-S2R-802, Revision 7, "Turkey Point Site Specific Seismic Evaluation Report" (Proprietary), for submittal to the Commission, being transmitted by Florida Power & Light letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the Turkey Point Site Specific Seismic Evaluation as part of an NRC RAI response and FSAR Appendix 3KK update, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Support FP&L as part of an NRC RAI response and FSAR Appendix 3KK update needed to obtain a combined operating license (COL).
- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of similar information to its customers for the purpose of obtaining COLAs from the NRC.
 - (ii) Westinghouse can sell support and defense of industry guidelines and acceptance criteria for plant-specific applications.
 - (iii) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical evaluation justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

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COL Application
Revision 7
Submittal 15
Sensitive Version
(3 OSMs)

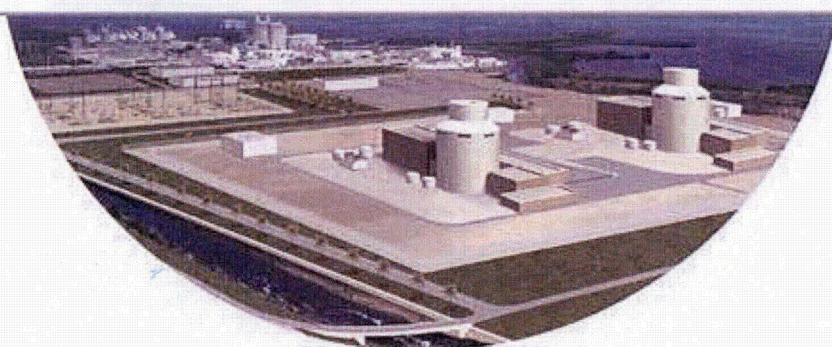
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