



FPL
U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

December 8, 2015

L-2015-300
10 CFR 50.90

RE: St. Lucie Unit 2
Docket No. 50-389
RAI Response for SNPB RAI-9 for the Technical Specification LAR and Exemption Request Regarding the Transitioning to AREVA Fuel

References:

1. FPL letter L-2014-366 dated December 30, 2014, "Application for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15002A091
2. FPL letter L-2015-091 dated March 23, 2015, "Supplemental Information for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15084A011
3. NRC letter dated May 12, 2015, "St. Lucie Plant, Unit No. 2 - Request for Additional Information Regarding License Amendment Request and Exemption Request Regarding the Transitioning to AREVA Fuel (TAC NOS. MF5494 AND MF5495)," Accession No. ML15127A405
4. FPL Letter L-2015-166 dated June 2, 2015, "RAI Reply for Application for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15161A316
5. FPL Letter L-2015-177 dated June 18, 2015, "Resubmittal of the AREVA Small Break LOCA Summary Report Within the Application for Technical Specification Change and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15181A290
6. NRC Letter dated June 24, 2015, "St. Lucie Plant, Unit 2 - Request for Additional Information Regarding License Amendment Request and Exemption Request Regarding the Transitioning to AREVA Fuel (TAC Nos. MF5494 and MF5495)," Accession No. ML15166A368
7. FPL Letter L-2015-206 dated July 30, 2015, "RAI Response to SNPB-RAI-1 for the Technical Specification LAR and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15219A184
8. NRC Letters dated September 4, 2015, "St. Lucie Plant, Unit No. 2 - Request for Additional Information Regarding License Amendment Request and Exemption Request Regarding the Transitioning to AREVA Fuel (TAC Nos. MF5494 AND MF5495)," Accession Nos. ML 15233A031 and ML15233A036
9. FPL Letter L-2015-259 dated October 2, 2015, "RAI Response to SRXB-RAI-1 and SNPB RAI-2 thru RAI-20 for the Technical Specification LAR and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15279A226
10. FPL Letter L-2015-279 dated November 3, 2015, "RAI Response Clarification for

Attachments 2 and 5 contain proprietary information per 10 CFR 2.390, upon removal, this document is
Florida Power & Light Company

uncontrolled

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NRR

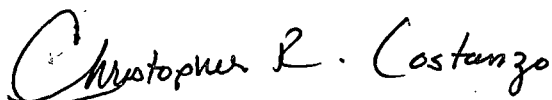
SRXB-RAI-1 and SNPB RAI-2 thru RAI-20 for the Technical Specification LAR and Exemption Request Regarding the Transitioning to AREVA Fuel," Accession No. ML15322A134

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) submitted via Reference 1 and supplemented via Reference 2 a license amendment to the Technical Specifications (TS) for St. Lucie Unit 2 to allow the use of AREVA fuel. References 4, 7 and 9 provided the responses to the NRC requests for additional information (RAIs) contained in References 3, 6 and 8. Reference 5 modified the proprietary markings contained in the SBLOCA summary report. Reference 10 provided clarifications and justification for the Westinghouse proprietary information provided in ANP-3440P, Revision 1 included in Reference 9.

The NRC transmitted additional RAIs in Reference 8 for which responses were provided in Reference 9, excluding the response to SNPB RAI-9. This letter provides the response to SNPB RAI-9 in ANP-3456, which addresses in detail the seismic/LOCA issue discussed in Reference 9 and the actions taken to resolve the issue. The details of the work performed are described in ANP-3456, Section 1.0. In addition, AREVA licensing report ANP-3352, Revision 1 is also included due to the updated seismic/LOCA analysis results, and the previously transmitted (in Reference 9) revised SBLOCA results. The changes to ANP-3352 are identified in the revision summary section of the revised report ANP-3352, Revision 1. The original no significant hazards evaluation conclusions remain unchanged by these RAI replies.

Executed on December 8, 2015.

Sincerely,



Christopher R. Costanzo
Site Vice President
St. Lucie Plant

CRC/KWF

Attachments

1. Affidavit for withholding the supporting proprietary AREVA licensing report ANP-3456P from the public.
2. Proprietary AREVA licensing report, ANP-3456P, Revision 0.
3. Non-proprietary version of the AREVA licensing report, ANP-3456NP, Revision 0.
4. Affidavit for withholding the supporting proprietary AREVA technical report ANP-3352P, Revision 1 from the public.
5. Proprietary AREVA technical report, ANP-3352P, Revision 1.
6. Non-proprietary version of the AREVA technical report, ANP-3352NP, Revision 1.

cc: USNRC Regional Administrator, Region II
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant
Ms. Cindy Becker, Florida Department of Health (w/o attachments)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Nathan E. Hottle. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the following document: "ANP-3456P Revision 0, Response to SLU2 NRC SNPB RAI-9," referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

Matt E. Hill

SUBSCRIBED before me this 4th
day of December, 2015.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129

