



December 17, 2015  
L-2015-278

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Re: Florida Power & Light Company  
St. Lucie Units 1 and 2, Docket Nos. 50-335, 50-389  
Docket No. 72-61

Florida Power & Light Company  
Turkey Point Units 3 and 4, Docket Nos. 50-250, 50-251  
Docket No. 72-62

NextEra Energy Seabrook, LLC  
Seabrook Station, Docket No. 50-443  
Docket No. 72-63

NextEra Energy Duane Arnold, LLC  
Duane Arnold Energy Center, Docket No. 50-331  
Docket No. 72-32

NextEra Energy Point Beach, LLC  
Point Beach Units 1 and 2, Docket Nos. 50-266, 50-301  
Docket No. 72-05

Subject: Commitment to Maintain Severe Accident Management Guidelines

The Nuclear Energy Institute (NEI) Nuclear Strategic Issues Advisory Committee (NSIAC) recently approved an Industry Initiative to implement and maintain Severe Accident Management Guidelines (SAMGs). This letter establishes commitments related to SAMGs for Florida Power & Light Company for itself, the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, and on behalf of NextEra Energy Seabrook, LLC (NextEra Energy Seabrook) the licensee for Seabrook Station; NextEra Energy Duane Arnold, LLC (NextEra Energy Duane Arnold), the licensee for Duane Arnold Energy Center; and NextEra Energy Point Beach, LLC (NextEra Energy Point Beach), the licensee for Point Beach Nuclear Plant, Units 1 and 2 (collectively referred to as NextEra Energy).

NMS26  
NMS5

These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in Emergency Operating Procedures (EOPs). SAMG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases.

The new SAMG commitments are listed in Attachment 1.

It is expected that NRC staff personnel will conduct periodic inspection of our SAMGs and performance deficiencies, if any, will be assessed using the Reactor Oversight Process. We also understand that inspection activities will not extend to NRC review and approval of SAMG strategies, or the use of equipment described in the SAMGs.

Should you have any questions concerning the content of this letter, please contact Larry Nicholson at 561-691-2798.

Sincerely,



Larry Nicholson  
Director, Nuclear Licensing and Regulatory Compliance

Attachment: List of Regulatory Commitments

cc: U. S. Nuclear Regulatory Commission  
Attn: Director, Office of Nuclear Reactor Regulation  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Regional Administrator, Region I  
Regional Administrator, Region II  
Regional Administrator, Region III  
USNRC Project Manager, Turkey Point and St. Lucie  
Senior Resident Inspector, USNRC, Turkey Point  
Senior Resident Inspector, USNRC, St. Lucie  
USNRC Project Manager, Seabrook Station  
Senior Resident Inspector, USNRC, Seabrook Station  
USNRC Project Manager, Duane Arnold  
Senior Resident Inspector, USNRC, Duane Arnold  
USNRC Project Manager, Point Beach  
Senior Resident Inspector, Point Beach

**ATTACHMENT 1**

**List of Regulatory Commitments**

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The following table identifies those actions committed to by St. Lucie Nuclear Plant, Turkey Point Nuclear Plant, Seabrook Station, Duane Arnold Energy Center, and Point Beach Nuclear Plant in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory Commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
St. Lucie Nuclear Plant, Turkey Point Nuclear Plant, Seabrook Station, Duane Arnold Energy Center, and Point Beach Nuclear Plant will consider the site SAMGs within plant configuration management processes in order to ensure that the SAMGs reflect changes to the facility over time.		X	October 31, 2016
Duane Arnold Energy Center will update the site SAMGs to revision 3 of the BWROG generic severe accident guidelines (published February, 2013).	X		June 30, 2017
St. Lucie Nuclear Plant, Turkey Point Nuclear Plant, Seabrook Station, Duane Arnold Energy Center, and Point Beach Nuclear Plant will update the site SAMGs to future revisions of the BWROG or PWROG, respectively, generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, <i>Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents</i> . <sup>1</sup>		X	Within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater

1 - Duane Arnold Energy Center - Use of NEI 14-01 guidance begins with the update to revision 4 of the BWROG generic severe accident guidelines.