



U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
Washington, D.C. 20555-0001

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Florida Power and Light Company's, Turkey Point Units 3 and 4, Final Compliance in Response to March 12, 2012 Commission Order Modifying 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, ADAMS Accession No. ML 12056A044.
2. FPL Letter, L-2013-062, Florida Power and Light Company's, Turkey Point Units 3 and 4, Overall Integrated Plan in Response to March 12, 2012 U.S. Nuclear Regulatory Commission's Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2013, ADAMS Accession No. ML130720690.
3. NRC Letter, Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent fuel Pool Instrumentation (Order No. EA-12-051) (TAC Nos. MF0988 and MF0989), dated July 11, 2013, ADAMS Accession No. ML13191A134.
4. FPL Letter, L-2013-225, Response to Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-015 "Reliable Spent Fuel Pool Instrumentation," dated July 30, 2013, ADAMS Accession No. ML13224A160.
5. FPL Letter, L-2013-248, Florida Power & Light Company's Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, Accession No. ML13248A313.

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6. NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Unit Nos. 3 and 4 - 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. MF0988 and MF0989) dated November 19, 2013, ADAMS Accession No. ML13280A177.
7. FPL Letter, L-2014-042, Florida Power & Light Company's Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2014, ADAMS Accession No. ML14073A066.
8. U.S. Nuclear Regulatory Commission, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051," dated March 26, 2014.
9. FPL Letter, L-2014-244, Florida Power & Light Company's Turkey Point Units 3 and 4, Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 15, 2014, ADAMS Accession No. ML14245A057.
10. FPL Letter, L-2015-018, Florida Power & Light Company's Turkey Point Units 3 and 4, Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 13, 2015, ADAMS Accession No. ML15075A023.
11. FPL Letter, L-2015-194, Florida Power & Light Company's Turkey Point Units 3 and 4, Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 11, 2015, ADAMS Accession No. ML15233A418.

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees including Florida Power and Light Company's (FPL) Turkey Point Units 3 and 4. In Reference 2, FPL submitted the Overall Integrated Plan for the implementation of this Order.

On July 11, 2013, the NRC issued a request for additional information (RAI) (Reference 3). FPL responded to the request providing supplemental information by FPL letter L-2013-225 dated July 30, 2013 (Reference 4). FPL submitted the first six-month status report by FPL letter L-2013-248, on August 21, 2013 (Reference 5).

On November 19, 2013, the NRC issued the Interim Staff Evaluation (Reference 6), which included additional RAIs. FPL provided the second six-month status report by FPL letter L-2014-042, dated February 26, 2014 and the response to RAIs 12 and 13 (Reference 7). On March 26, 2014, the NRC issued an audit plan to review Licensee submittals (Reference 8) to synchronize the NRC's review to the site's compliance date. In Reference 8, the NRC requested FPL to place the response to the remaining RAIs on the e-portal. The responses to the RAIs were placed on the e-portal in accordance with the audit review streamlined process. The third, fourth and, fifth six-month status reports were submitted to NRC by FPL letters L-2014-244, L-2015-018, and L-2015-194, dated August 15, 2014, February 13, 2015, and August 11, 2015, respectively (References 9, 10, and 11).

Condition C.3 of the Order required all Licensees to report to the Commission when full compliance with the requirements of the Order is achieved. This letter provides notification that FPL's Turkey Point Units 3 and 4 have completed the requirements of EA-12-051 and are in full compliance with the Order for Turkey Point Units 3 and 4. The enclosure to this letter provides a summary of how the compliance requirements were met.

This letter contains no new regulatory commitments and no revisions to existing regulatory commitments.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Turkey Point Licensing Manager, at 305-246-6698.

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

Executed on January 06, 2016.

Sincerely,



Thomas Summers  
Site Vice President  
Turkey Point Nuclear Plant

Enclosure

cc: USNRC Regional Administrator, Region II  
USNRC Project Manager, Turkey Point Nuclear Plant  
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant

**L-2016-002**

**ENCLOSURE**

**FLORIDA POWER & LIGHT COMPANY'S  
TURKEY POINT UNITS 3 AND 4  
FULL COMPLIANCE REPORT FOR THE  
MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES  
WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION  
(ORDER NUMBER EA-12-051)**

**TURKEY POINT UNITS 3 AND 4  
FULL COMPLIANCE REPORT FOR THE  
MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES  
WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION  
(ORDER NUMBER EA-12-051)**

**Background**

Turkey Point Units 3 and 4 developed an Overall Integrated Plan (OIP) (Reference 1), documenting how the requirements for reliable spent fuel pool level instrumentation (SFPLI) would be achieved, in response to NRC Order EA-12-051, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (Reference 2). The Turkey Point Units 3 and 4 OIP was submitted to the NRC on February 26, 2013 and was supplemented by Six-Month Status Reports (References 3, 4, 5, 6 and 7), in accordance with Order EA-12-051. By letter dated November 19, 2013, the NRC provided its Interim Staff Evaluation and Request for Additional Information regarding the Overall Integrated Plan for implementation of Order EA-12-051 (Reference 8).

Each Turkey Point nuclear unit has a dedicated Spent Fuel Pool (SFP). Turkey Point Units 3 and 4 each have two independent full scale SFP level measurement channels, supplied and qualified by Westinghouse, installed in response to Reference 1.

On November 12, 2015, Turkey Point Unit 3 achieved full compliance with Order EA-12-051 and commenced reactor startup on December 1, 2015. On December 30, 2015, Turkey Point Unit 4 achieved full compliance with Order EA-12-051. Completion of the elements identified below for Turkey Point Units 3 and 4, as well as References 1, 3, 4, 5, 6 and 7, constitutes full compliance with Order EA-12-051 for Turkey Point Units 3 and 4.

The design features for the Unit 3 SFPLI are included in Engineering Change (EC) 280521. The design features for the Unit 4 SFPLI are included in EC 280522. These documents have been provided to the NRC previously, and can be made available for their review.

**Compliance Summary**

**NRC RAI, ISE, and Audit Items - Status: Complete**

During the NRC review and audit process (Reference 9), FPL provided responses for the following items for Turkey Point Units 3 and 4:

- Requests for Additional Information (RAI)
- Interim Staff Evaluation (ISE) RAIs
- Audit Questions

The NRC letter (Reference 9) delineated the items reviewed during the Turkey Point Units 3 and 4 onsite audit. Reference 9 identified no open audit item(s) related to SFPLI implementation for Turkey Point Units 3 and 4.

As requested by the NRC, Turkey Point Units 3 and 4 responses to the SFPLI RAIs have been placed on the ePortal in accordance with the NRC audit review streamlined process.

**Milestone Schedule Items - Status: Complete**

<b>Turkey Point Units 3 and 4 Milestone</b>	<b>Status</b>
Submit OIP	Complete
Commence Engineering and Design	Complete
Complete Engineering and Design	Complete
Complete Procurement of SFP Instruments	Complete
Commence Installation of SFP Instruments	Complete
Level Measurement System Functional	Complete

**Identification of Levels of Required Monitoring - Complete**

Turkey Point Units 3 and 4 identified the three required levels for monitoring spent fuel pool (SFP) level in compliance with Order EA-12-051. These levels have been integrated into the site processes for monitoring level during events and responding to loss of SFP inventory.

**Instrument Designed Features - Status: Complete**

The design of the SFP level measurement instrumentation system installed at Turkey Point Units 3 and 4 complies with the requirements specified in Order EA-12-051 and described in NEI 12-02 "Industry Guidance for Compliance with NRC Order EA-12-051." The instrumentation system has been installed in accordance with the station design control process.

The instruments have been arranged to provide reasonable protection against missiles. The instruments have been mounted to retain design configuration during and following the maximum expected ground motion. The instruments will be reliable during expected environmental and radiological conditions when the SFP is at saturation for extended periods.

The instruments are independent of each other and have separate and diverse power supplies. The instruments will maintain their designed accuracy following a power interruption and are designed to allow for routine testing and calibration. The instrument display is readily accessible during postulated events and allows for SFP level information to be promptly available to decision makers.

**Program Features - Status: Complete**

Training of personnel performing maintenance functions including calibration and surveillance associated with the SFP level instrument channels at Turkey Point Units 3 and 4 has been completed in accordance with an accepted training process as recommended in NEI 12-02,

Section 4.1. Operating and maintenance procedures for the Turkey Point Units 3 and 4 SFP level instrument channels have been developed and integrated with existing procedures. These procedures have been verified and are available for use in accordance with the site procedure control program. Site processes have been established to ensure the instruments are maintained at their design accuracy.

## References

The following references support the updates to the OIP described in this enclosure.

- (1) FPL Letter L-2013-062, dated February 26, 2013, Florida Power & Light Company's Turkey Point Units 3 and 4, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), Accession No. ML130720690.
- (2) 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.
- (3) FPL Letter L-2013-248, Florida Power & Light Company's Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, Accession No. ML13248A313.
- (4) FPL Letter L-2014-042, Florida Power & Light Company's Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2014, ADAMS Accession No. ML14073A066.
- (5) FPL Letter L-2014-244, Florida Power & Light Company's Turkey Point Units 3 and 4, Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 15, 2014, ADAMS Accession No. ML14245A057.
- (6) FPL Letter L-2015-018, Florida Power & Light Company's Turkey Point Units 3 and 4, Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 13, 2015, ADAMS Accession No. ML15075A023.
- (7) FPL Letter L-2015-194, Florida Power & Light Company's Turkey Point Units 3 and 4, Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 11, 2015, ADAMS Accession No. ML15233A418.
- (8) NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Unit Nos. 3 and 4 - 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. MF0988 and MF0989) dated November 19, 2013, Accession No. ML13280A177.
- (9) NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Units 3 and 4 – Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC Nos. MF0982, MF0983, MF0988, and MF0989) dated November 12, 2015, Accession No. ML15307A314.