



December 30, 2016

Ms. Annette L. Vietti-Cook  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Submitted via: NRC Electronic Information Exchange

Re: Combined License (COL) for FPL Turkey Point Units 6 & 7

Dear Ms. Vietti-Cook:

Florida Power and Light (FPL) has filed an application with the Nuclear Regulatory Commission seeking approval of a combined license (COL) to construct and operate two additional units (Units 6 & 7) at the Turkey Point site in Miami-Dade County. The COL is valid for 40 years with the option of a 20-year renewal. Miami-Dade County has reviewed the application submitted by FPL and offers the following comment.

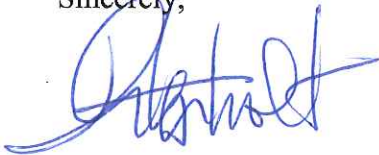
The Turkey Point site is located adjacent to the Biscayne Bay shoreline, approximately 8 miles west of the Elliott Key Barrier Island. The location of Units 6 & 7 along the Biscayne Bay shoreline makes consideration of well-founded sea level rise data critical to assessing safety vulnerabilities at the site. As such, Miami-Dade County urges the Nuclear Regulatory Commission to consider sea level rise projections published by federal agencies when modeling safety vulnerabilities related to Units 6 & 7 based on the following:

- The application states that the finished grade elevation for Units 6 & 7 where safety-related facilities would be located is at 25.5 feet NAVD88 and the elevation of floor entrances and openings of all safety-related structures is at 26 feet NAVD88. The plant site is protected by a 21.5-foot high retaining wall.
- Based on modeling, the application states that the combined 'Probable Maximum Storm Surge' still water level (21.1 feet NAVD88) and wave run-up results in a maximum water level due to a 'Probable Maximum Hurricane' at Units 6 & 7 of 24.8 feet NAVD88, approximately one foot below safety-related structures. This analysis considers 1 foot of sea level rise based on historical tide gage measurements taken from the Miami Beach tidal gage station (no longer in operation) from 1931 to 1981.
- The "*Global Sea Level Rise Scenarios for the United States National Climate Assessment*" published by NOAA provides four estimates of global SLR by 2100 that reflect different degrees of ocean warming and ice sheet loss. The scenarios range from the "Lowest" which estimates 0.7 feet of sea level rise by 2100 to the "Highest" which estimates 6.6 feet of sea level rise by 2100. The report states that "the Highest Scenario should be considered in situations where there is little tolerance for risk (e.g. new infrastructure with a long anticipated life cycle such as a power plant)."<sup>1</sup>
- It should be further noted that Miami-Dade County Zoning Resolution No. Z-56-07 (Condition No. 21) requires FPL to consider sea level rise projected by the federal government as well as higher water levels that are anticipated as a result of state and federal restoration efforts when designing project features.

- In addition, Miami-Dade County joined with Broward, Monroe and Palm Beach Counties to create the Southeast Florida Regional Climate Change Compact (“Compact”) in 2010. Recognizing the vulnerability of the Southeast Florida region to the impacts of climate change, the counties resolved to work collaboratively on mitigation and adaptation strategies. The Compact has developed a Unified Sea Level Rise Projection, based on federal sea level rise projections.<sup>ii</sup> The report recommends that high risk facilities such as nuclear power plants should be evaluated using the NOAA “High” projections. Through agreement with the South Florida Regional Planning Council, FPL has agreed to consider Compact data and reports for its planning purposes as Units 6 & 7 progress toward final approval, construction and operation.

Thank you for your attention to this matter. If you need additional information, please do not hesitate to contact me at (305) 375-3076.

Sincerely,



Jack Osterholt  
Deputy Mayor/Director  
Department of Regulatory and Economic Resources

JB:KB

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<sup>i</sup> Parris, A., P. Bromirski, V. Burkett, D. Cayan, M. Culver, J. Hall, R. Horton, K. Knuuti, R. Moss, J. Obeysekera, A. Sallenger, and J. Weiss, 2012: Global Sea Level Rise Scenarios for the United States National Climate Assessment. NOAA Tech Memo OAR CPO-1. 37 pp., National Oceanic and Atmospheric Administration, Silver Spring, MD.

<sup>ii</sup> <http://www.southeastfloridaclimatecompact.org/wp-content/uploads/2015/10/2015-Compact-Unified-Sea-Level-Rise-Projection.pdf>