

April 14, 2017

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
FLORIDA LIGHT & POWER COMPANY) Docket Nos. 52-040 & 52-041
)
(Turkey Point, Units 6 and 7))

NRC STAFF REVISED EXHIBIT LIST AND UNOPPOSED MOTION FOR
LEAVE TO FILE CORRECTED TESTIMONY

In response to the April 4, 2017 email from the Board's clerk, Jennifer Scro, NRC Staff hereby corrects errors in its Exhibit List, NRC-001-R, filed March 23, 2017. As requested, Staff has assigned exhibit numbers to the affidavits of Alicia Williamson-Dickerson, Ann L. Miracle, Daniel O. Barnhurst and Paul D. Thorne. Staff also confirms that NRC-015, NRC-016 and NRC-054 will not be used as exhibit numbers. Additionally, Staff is revising NRC-030 in order to include the information in the deleted NRC-016. This revised exhibit will be designated NRC-030-R.

The NRC Staff also requests leave from the Board to file corrected versions of its pre-filed direct testimony (Exhibit NRC-002-R), filed on March 1, 2017. It has come to the NRC Staff's attention that there are additional exhibit number and citation errors in NRC-002-R. Additionally, Staff wishes to add pin citations to lengthy exhibit references in order that all parties are able to access the information easily. All changes are shown in Attachment A to this motion. The corrected version of the direct testimony will be designated NRC-002-R2.

Staff certifies that it has made a sincere effort to contact the other parties in this proceeding to explain to them the factual and legal issues raised in this motion, and to resolve

those issues. Staff certifies that, after this consultation, the other parties do not oppose this motion.

/Signed (electronically) by/
Megan A. Wright
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Commission Mail Stop O-16 F3
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Megan.Wright@nrc.gov

Dated at Frisco, Texas
this 14th day of April, 2017

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CERTIFICATE OF SERVICE

I hereby certify that the NRC STAFF REVISED EXHIBIT LIST AND UNOPPOSED MOTION FOR LEAVE TO FILE CORRECTED TESTIMONY has been filed through the E-Filing system this 14th day of April, 2017.

/Signed (electronically) by/
Megan A. Wright
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U.S. Nuclear Regulatory
Commission Mail Stop O-16 F3
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Dated at Frisco, Texas
this 14th day of April, 2017

ATTACHMENT A

Corrections to Staff Direct Testimony, NRC-002-R2

Page Number	Description of Change
9	Corrected reference to exhibit. "NRC-016" now says "NRC-030-R."
14, 42	Corrected reference to exhibit and pin cite added. "NRC-016" now says "NRC-030-R at 3.1-1."
14	Pin cite added. "NRC-013" now says "NRC-008A at 2-60."
15	Pin cite added. "NRC-018" now says "NRC-018 at G48 to G49."
24	Citation corrected. "Florida Rule 62-600.440(a)-(f)" now says "Fl. Admin. Code 62-600.440(5)(a)-(f)."
25	Citation corrected. "NRC-021 at 70,513-5 to 70,51-5" now says "NRC-021 at 70,513 and 70,515."
27	Citation corrected. "NRC- 021 at 70,525" now says "NRC-021 at 70,526."
30	Corrected reference to exhibit and pin cite added. "NRC-024" now says "NRC-070 at 5 to 15."
32	Citation corrected. "40 C.F.R. § 146.15(5)(b)" now says "Fl. Admin. Code 62-600.440(6)(b)."
34	Citation corrected and pin cite added. "NRC-030" now says "NRC-030-R at 3.4-7."
34	Pin cite added. "NRC-032" now says "NRC-032 at 2."
34	Pin cite added. "NRC-033" now says "NRC-033 at 36, 37."
34, 35	Citation corrected. "NRC-030" now says "NRC-030-R."

35	Citation added. "... southwest of the Turkey Point Units 6 and 7 site" now says "...southwest of the Turkey Point Units 6 and 7 site (NRC-008A at 5-27)."
40	Pin cite added. "NRC-040" now says "NRC-040 at 17."
41	Pin cite added. "NRC-018" now says "NRC-018 at G23."
42	Pin cite added. "NRC-041" now says "NRC-041 at 81."
42	Pin cite added. "NRC-041" now says "NRC-041 at 82, 252."
43	Citation corrected. "Fl. Admin. Code 62-4-TN1084" now says "Fl. Admin. Code 62-528.100(1); NRC-019."
45	Citation corrected. "Fl. Admin. Code 62-4; NRC-042" now says "Fl. Admin. Code 62-528.405; NRC-019."
56	Citation corrected. "Underground Injection Control Program-Relative Risk Assessment of Management Options for Treated Wastewater in South Florida; Notice of Availability 68 Fed. Reg. 23,673 (May 5, 2003); (TN3658; NRC-045)" now says "EPA 816-R-03-010, Relative Risk Assessment of Management Options for Treated Wastewater in South Florida (Apr. 2003) (TN4759; NRC-010)."
57	Pin cite added. "NRC-044" now says "NRC-044 at 4 to 5."
57	Pin cite added. "NRC-010" now says "NRC-010 at 4 to 14."
60	Text corrected and citation added. "...at a borehole south of Turkey Point Units 6 and 7, and missing at a borehole north of Turkey Point Units 6 and 7" now says "...at a borehole north of Turkey Point Units 6 and 7, and missing at a borehole south of Turkey Point Units 6 and 7. (NRC-040 at 51)."
63	Pin cite added. "NRC-064" now says "NRC-064 at 3 and 4."
64	Pin cite added. "TN4760 at 159" now says "TN4760; NRC-047 at 147, 158."
65	Citation corrected. "NRC-059" now says "NRC-052."
67	Text corrected. "1,970 to 1,972 ft." now says "1,970 to 1,992 ft."

69	Citation added. "...with characteristics similar to the dolomite confining unit described by McNeill occur at the Turkey Point Units 6 and 7 site" now says "...with characteristics similar to the dolomite confining unit described by McNeill occur at the Turkey Point Units 6 and 7 site. (NRC-071)."
70	Citation corrected. "FPL 2014-TN3932; NRC-054" now says "FPL 2013-TN3931; NRC-055."
70	Pin cite added. "NRC-055" now says "NRC-055 at Attachment 4 to 5."
71	Pin cite added. "NRC-063" now says "NRC-063 at 2."
71	Citation corrected. "FPL 2013-TN3931; NRC-055" now says "NRC-066 at 17 to 18."
71	Citation corrected. "TN3931 at 47; NRC-055" now says "NRC-066 at 47."
75	Citation corrected. "FPL Answer to RAI 6985 TN3932 at 84 to 85; L-2014-002 Attachment Page 84 of 193; NRC-054" now says "NRC-066 at 84 to 85."
78	Pin cite added. "NRC-011" now says "NRC-011 at 489."