



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FPL submitted the Subsequent License Renewal Application on January 30, 2018 (ADAMS Package Accession No. ML18037A812) therefore, it is no longer necessary to withhold as proprietary.

December 21, 2017

LICENSEE: Florida Power & Light Company
FACILITY: Turkey Point Nuclear Generating, Unit Nos. 3 and 4
SUBJECT: SUMMARY OF PRE-APPLICATION MEETING HELD ON SEPTEMBER 6, 2017, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND FLORIDA POWER & LIGHT COMPANY REPRESENTATIVES TO DISCUSS AMP XI.M16A, "PWR VESSEL INTERNALS" ASSOCIATED WITH THE TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4, SUBSEQUENT LICENSE RENEWAL APPLICATION

On September 6, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff met with members of Florida Power & Light Company (the applicant) in a closed door meeting to discuss the license renewal application for the Turkey Point Nuclear Generating Unit Nos. 3 and 4. The meeting agenda can be found at the NRC's Agencywide Documents and Access Management System Accession No. ML17230A025, a list of attendees is provided in Enclosure 1, and a summary of the meeting is provided in Enclosure 2.

Sincerely,

/RA/

Lois M. James, Senior Project Manager
License Renewal Project Branch
Division of Materials and License Renewal
Office of Nuclear Reactor Regulation

Docket Nos.: 50-250 and 50-251

Enclosures:
1. Attendance List
2. Meeting Summary

cc w/encls: Listserv

SUBJECT: SUMMARY OF PRE-APPLICATION MEETING HELD ON SEPTEMBER 6, 2017, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND FLORIDA POWER & LIGHT COMPANY REPRESENTATIVES TO DISCUSS AMP XI.M16A, "PWR VESSEL INTERNALS" ASSOCIATED WITH THE TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4, LICENSE SUBSEQUENT LICENSE RENEWAL DATED

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- SRuffin, DMLR
- AWong, DMLR

ML18080A168

ADAMS Accession No.: ~~ML17348B310~~

*concurrence via e-mail

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CLOSED MEETING
BETWEEN THE NRC STAFF AND FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4
SUBSEQUENT LICENSE RENEWAL APPLICATION – REACTOR VESSEL INTERNALS
ROCKVILLE, MARYLAND

MEETING ATTENDANCE LIST
SEPTEMBER 6, 2017

PARTICIPANTS

AFFILIATIONS

Lois James	U.S. Nuclear Regulatory Commission (NRC)
James Medoff	NRC
Bennett Brady	NRC
Joseph Donoghue	NRC
Seung Min	NRC
Theresa Buchanan	NRC
Allen Hiser	NRC
Dave Rudland	NRC
Jeff Poehler	NRC
Steve Ruffin	NRC
Heather Jones	NRC
Albert Wong	NRC
Mark Joseph	Florida Power & Light Company (FPL)
Stephan Franzone	FPL
Bill Maher	FPL
Maribel Valdez	FPL
Richard Orthen	FPL
William Maher	FPL
Paul Jacobs	FPL
Steve Scroggs	FPL
Sara Mechtensimer	FPL

PARTICIPANTS

AFFILIATIONS

James V. Wick

Enercon

Stephen Hail

Enercon

Jack Hoffman

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Tom Slavonic

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Mary Hoganson

Enercon

Randall Lantz

Enercon

Susanna Scott

Enercon

Mike Margolis

Enercon

CLOSED MEETING
BETWEEN THE NRC STAFF AND FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4
SUBSEQUENT LICENSE RENEWAL APPLICATION – REACTOR VESSEL INTERNALS
ROCKVILLE, MARYLAND

MEETING SUMMARY
SEPTEMBER 6, 2017

On May 17, 2017, Florida Power & Light Company (FPL, the licensee) submitted a Notice of Intent (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML17142A036 (non-public, proprietary) and ML17139D442 (public, non-proprietary)) to submit a supplemental license renewal application (SLRA) for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). This Notice of Intent was submitted as proprietary information. On May 25, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff issued its approval of FPL's request for withholding information from public disclosure (ADAMS Accession Nos. ML17096A477 (non-public, proprietary) and ML17139D441 (public, non-proprietary)).

On September 6, 2017, the NRC staff participated in a pre-application, closed door meeting at NRC Headquarters with FPL to discuss Turkey Point's plant specific program to implement MRP-227, "Materials Reliability Program: Pressurized Water Reactor [PWR] Internals Inspection and Evaluation Guidelines." The proprietary meeting notice was issued on August 28, 2017 (ADAMS Accession No. ML17248A007, non-public), and was supplemented with additional topics to be discussed on September 5, 2017 (ADAMS Accession No. ML17248A007, non-public).

As a starting point, FPL stated that Turkey Point's initial license renewal application (LRA) was submitted prior to the staff's issuance of NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," in July 2001. The licensee further stated that it submitted a letter of intent to Adopt Materials Reliability Program (MRP) Report MRP-227, "Pressurized Water Reactor Internals Inspection and Evaluation Guidelines" and Revision of Commitments, in May 2011 (ADAMS Accession No. ML11152A068), and affirmed that Turkey Point's License Renewal Reactor Vessel Internals (RVI) Aging Management Program (AMP) meets all criteria specified in the NRC staff's safety evaluation for MRP-227 (MRP-227-A).

The NRC staff cautioned FPL that Action Item 8, Subpart 5 of the staff's safety evaluation of MRP-227, Rev. 0, may not have previously applied and FPL should address this action item in Turkey Point's SLRA. The NRC staff also requested that FPL address whether all three criteria for plant-specific applicability of MRP-227-A were met throughout the plant life in the Turkey Point's SLRA.

Following the meeting, the NRC staff found that on December 14, 2012, FPL submitted the Turkey Point License Renewal RVI Commitment Implementation Report and Inspection Plan (ADAMS Accession No. ML12363A103), and on December 18, 2015, the NRC staff issued its assessment of the licensee's submittal (ADAMS Accession No. ML15336A046) and addressed the applicant/licensee action items specified in MRP-227-A that are applicable to Turkey Point. The staff concluded that the submittal was acceptable because it was consistent with the inspection and evaluation guidelines of MRP-227-A and because the licensee further explained

Enclosure 2

that, in the development of the SLRA, no changes were made in the RVI component list or aging effects.

For the SLRA RVI AMP, MRP-175, Revision 0, "Material Reliability Program: PWR Internals Aging Degradation Mechanism Screening and Threshold Values," is being used as the source of the screening criteria. The MRP-191, "Materials Reliability Program: Screening, Categorization and Ranking of Reactor Internals Components for Westinghouse and Combustion Engineering PWR Design," will be used to develop the fluence input parameters. The NRC staff cautioned that these fluence values were not meant to be bounding, but are representative values based on expert panel elicitation, and the use of MRP-191 parameters and a scaling factor should be fully explained in the Turkey Point SLRA.

The staff identified additional areas of concern that should be addressed in the SLRA:

1. Evaluation of RVI component fatigue
2. Clear distinction between ASME Code Section XI items and MRP-227 items
3. Robust gap analysis (e.g., provide inputs and details of the analysis), not just results

The NRC staff ended the closed meeting by stressing that the staff will strive for an 18 months schedule, assuming the SLRA is thorough, is sufficiently detailed, addresses previous requests for additional information, and considers peer review comments.