



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.

January 5, 2018

LICENSEE: Florida Power & Light Company
FACILITY: Turkey Point Nuclear Generating Units 3 and 4
SUBJECT: SUMMARY OF CLOSED PRE-APPLICATION TELECONFERENCE HELD ON SEPTEMBER 12, 2017, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND FLORIDA POWER & LIGHT COMPANY REPRESENTATIVES TO DISCUSS SCOPING AND SCREENING METHODOLOGY ASSOCIATED WITH THE TURKEY POINT NUCLEAR GENERATING UNITS 3 AND 4, SUBSEQUENT LICENSE RENEWAL APPLICATION

On September 12, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of Florida Power & Light Company (FPL) in a closed teleconference to discuss the subsequent license renewal application for the Turkey Point Nuclear Generating Units 3 and 4, specifically FPL's scoping and screening methodology. The proprietary meeting agenda can be found at the NRC's Agencywide Documents and Access Management System Accession No. ML17230A299, a list of attendees is provided in Enclosure 1, a summary of the meeting is provided in Enclosure 2, and a list of risk significant systems is provide in Enclosure 3.

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
3. Risk Significant Systems

cc w/encls: See next page

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ML18081A293

ADAMS Accession No.: ~~ML18002A006~~

*Concurrence via email

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CLOSED TELECON
BETWEEN THE NRC STAFF AND FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNITS 3 AND 4
SUBSEQUENT LICENSE RENEWAL APPLICATION – SCOPING AND SCREENING
METHODOLOGY

MEETING ATTENDANCE LIST
SEPTEMBER 12, 2017

<u>PARTICIPANTS</u>	<u>AFFILIATIONS</u>
Lois James	U.S. Nuclear Regulatory Commission (NRC)
Bill Rogers	NRC
David Drucker	NRC
Paula Cooper	NRC
Adam Wilson	NRC
Allen Hiser	NRC
William Holston	NRC
William Maher	Florida Power & Light Company (FPL)
Paul Jacobs	FPL
Terry McCool	FPL
Rick Orthen	FPL
Steve Franzone	FPL
James V. Wicks	Enercon
Stephen Hale	Enercon
Jack Hoffman	Enercon

CLOSED TELECON
BETWEEN THE NRC STAFF AND FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNITS 3 AND 4
SUBSEQUENT LICENSE RENEWAL APPLICATION – SCOPING AND SCREENING
METHODOLOGY

TELECONFERENCE SUMMARY
SEPTEMBER 12, 2017

On May 17, 2017, Florida Power & Light Company (FPL or the applicant) 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 subsequent license renewal application (SLRA) for Turkey Point Nuclear Generating Units 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 12, 2017, the NRC staff participated in a pre-application, closed teleconference with FPL to discuss the content of the Turkey Point SLRA, specifically FPL's scoping and screening methodology. The proprietary meeting notice was issued on August 23, 2017 (ADAMS Accession No. ML17230A299).

The applicant began the discussion by explaining that the same individuals who were involved in the scoping and screening of the development of the initial license renewal application were also involved in the scoping and screening of the development of the SLRA. In reviewing what changed between the initial license renewal and the subsequent license renewal (SLR), the applicant noted no changes in Title 10 of the *Code of Federal Regulations* Section 54.4 (a)(1) (10 CFR 54.4(a)(1)) or 10 CFR 54.4(a)(3):

10 CFF 54.4 Scope.

- (a) Plant systems, structures, and components within the scope of this part are--
 - (1) Safety-related systems, structures, and components which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions--
 - (i) The integrity of the reactor coolant pressure boundary;
 - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition; or
 - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in § 50.34(a)(1), § 50.67(b)(2), or § 100.11 of this chapter, as applicable.

Enclosure 2

- (3) All systems, structures, and components relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection (10 CFR 50.48), environmental qualification (10 CFR 50.49), pressurized thermal shock (10 CFR 50.61), anticipated transients without scram (10 CFR 50.62), and station blackout (10 CFR 50.63).

The applicant identified one major change, implementation of National Fire Protection Association (NFPA)-805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants," that could impact the scope of SLR. As a result of this change, the applicant evaluated its scoping regarding 10 CFR 54.4(a)(2):

10 CFF 54.4 Scope.

- (a) Plant systems, structures, and components within the scope of this part are--
 - (2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section.

The applicant stated they used the following four documents to develop the scope of SLR:

- NUREG-2191, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report,"
- NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants,"
- Nuclear Energy Institute (NEI) 17-01, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 for Subsequent License Renewal [SLR]," and
- NEI 95-10, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule."

The applicant considered special interactions and whether these are within scope:

- Buildings containing safety and non-safety systems
- High energy line break consideration considerations
- Structural integrity attachment
- Leakage and spray systems/areas for mid to low energy line break (external areas not included)
- For containment, non-safety equipment near moderate or low energy line break are not within scope

The NRC staff reminded FPL that the application needs to provide a basis for what is within and not within scope. In addition, the applicant should be aware of what the NRC staff asked in requests for additional information (RAIs) during license renewal reviews and address any RAIs potentially applicable to Turkey Point.

The NRC staff reminded the applicant that there is a new pipe coating aging management program (AMP) and that implementation of NFPA-805 could impact fire protection equipment within the scope of SLR. The applicant stated that no equipment was removed from within scope of SLR as a result of NPFA-805 and that they will commit to new AMPs.

As a follow up to this meeting, the applicant provided a list of the top risk significant systems (see Enclosure 3) to permit the NRC staff to use risk insights in performing its review.

List of Risk Significant Systems provided by the applicant:

Intake Cooling Water (ICW)
Component Cooling Water (CCW)
Auxiliary Feedwater
Safety Injection
Main Feedwater
Emergency Diesel Generators (EDGs)
Instrument Air
Startup Transformer
4160 Volt (V) Switchgear
Chemical and Control Volume System (CVCS)
Emergency Load Sequencers
Service Water
125 V DC & 120 V AC
240 KV Switchyard
480 V Load Centers
DC Equipment Room Heating, Ventilation, and Air Conditioning (HVAC)
Standby Steam Generator Feedwater Pumps (SSGFW)
Reactor Coolant
Engineered Safeguards
Accumulators