



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

June 5, 2018

Mr. Mano Nazar  
President, Nuclear Division  
and Chief Nuclear Officer  
Florida Power & Light Company  
Mail Stop EX/JB  
700 Universe Blvd.  
Juno Beach, FL 33408

**SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 – AUDIT PLAN AND SETUP OF ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ADDRESS NON-CONSERVATIVE ACTIONS FOR CONTAINMENT AND CONTROL ROOM VENTILATION FUNCTIONS (EPID L-2017-LLA-0425)**

Dear Mr. Nazar:

By application dated December 21, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17355A184), Florida Power & Light Company (FPL; the licensee) submitted a license amendment request (LAR) for Turkey Point Nuclear Generating Unit Nos. 3 and 4. The proposed amendments would revise the Technical Specifications (TSs) pertaining to the Engineered Safety Features Actuation System instrumentation to resolve non-conservative actions associated with the Containment ventilation isolation and the Control Room ventilation isolation functions. In addition, the amendments would revise the Control Room ventilation isolation function to no longer credit Containment radiation monitoring instrumentation, eliminate redundant radiation monitoring instrumentation requirements, eliminate select core alterations applicability requirements, relocate radiation monitoring and Reactor Coolant System leakage detection requirements within the TS to align with their respective functions, and relocate the Spent Fuel Pool area monitoring requirements to licensee-controlled documents.

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) staff's review, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff limited read-only access to internal licensee information (e.g., calculations and procedures) referred to in the draft request for additional information (RAI) ARCB-RAI-3 issued May 4, 2018 (ADAMS Accession No. ML18135A383). The NRC staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit internal licensee information to confirm that the information supports statements made in the LAR and to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

The audit may also include interactions (e.g., teleconferences, webinars, or face-to-face) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available on the online reference portal. The face-to-face interactions would be conducted either in the vicinity of the NRC headquarters or at the licensee's site if it is determined such interactions are an effective manner to resolve issues identified during the desk portion of the audit.

Use of the online reference portal is acceptable, as long as the following conditions are met:

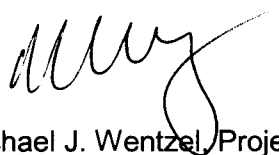
- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent NRC staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents referred to in the draft RAI. The NRC staff may request additional documents during the review, which will be transmitted to you via email. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as username and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. As discussed with Mr. Steve Catron on May 18, 2018, FPL agrees to the terms and conditions set forth in this letter.

If you have any questions, please contact me at (301) 415-6459 or [Michael.Wentzel@nrc.gov](mailto:Michael.Wentzel@nrc.gov).

Sincerely,



Michael J. Wentzel, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure:  
Audit Plan

cc: Listserv

## **AUDIT PLAN**

### **BACKGROUND**

By application dated December 21, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17355A184), Florida Power & Light Company (the licensee) submitted License Amendment Request (LAR) No. 235 for Turkey Point Nuclear Generating Unit Nos. 3 and 4. The proposed amendments would revise the Technical Specifications (TSs) pertaining to the Engineered Safety Features Actuation System instrumentation to resolve non-conservative actions associated with the Containment ventilation isolation and the Control Room ventilation isolation functions. In addition, the amendments would revise the Control Room ventilation isolation function to no longer credit Containment radiation monitoring instrumentation, eliminate redundant radiation monitoring instrumentation requirements, eliminate select core alterations applicability requirements, relocate radiation monitoring and Reactor Coolant System leakage detection requirements within the TS to align with their respective functions, and relocate the Spent Fuel Pool area monitoring requirements to licensee-controlled documents. In the draft Request for Additional Information (RAI) ARCB-RAI-3, issued May 4, 2018 (ADAMS Accession No. ML18135A383), the U.S. Nuclear Regulatory Commission (NRC) staff requested the licensee to provide certain analyses described in Attachment 3 of the LAR. Based on clarification conducted on May 15, 2018 (ADAMS Accession No. ML18136A724), the licensee agreed to make the requested information available for audit by the NRC staff.

### **REGULATORY AUDIT BASES**

An audit was determined to be the most efficient approach toward a timely resolution of questions associated with this LAR review, because the NRC staff will have an opportunity to minimize the potential for further rounds of RAIs and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The NRC staff is requesting an initial set of internal licensee information to be reviewed at the NRC headquarters using an online reference portal. Upon completion of this audit, the staff is expected to achieve the following.

1. Confirm internal licensee information supports statements made in the LAR.
2. Determine whether the information included in the documents is necessary to be submitted to support a safety conclusion.

The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

### **REGULATORY AUDIT SCOPE OR METHODOLOGY**

The audit is being conducted to support the resolution of the issues identified in the NRC staff's draft RAI ARCB-RAI-3 dated May 4, 2018. The regulatory audit will address the items in the regulatory audit bases section. The audit will be initially conducted as a desk audit to review information made available on an online reference portal. The audit may include interactions (e.g., teleconferences, webinars, or face-to-face) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available.

**INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT**

The information required for the initial desk audit is the documents referred to in the draft RAI ARCB-RAI-3 issued on May 4, 2018. The licensee will be informed via electronic mail if there is a need for additional supporting documentation.

**TEAM ASSIGNMENTS**

Key licensee personnel involved in the development of the RAI responses should be made available for interactions on a mutually agreeable schedule to respond to any questions from the NRC staff.

<b>Team Member</b>	<b>Title</b>	<b>Division</b>	<b>Area of Responsibility</b>
Michael Wentzel	Project Manager	NRR/DORL/LPL2	Project Management
Kristy Bucholtz	Reactor Engineer	NRR/DRA/ARCB	Technical Review

**LOGISTICS**

The audit will be started once an electronic portal is set up and the documentation is made available to the NRC staff. The initial desk audit will be conducted over several weeks. The licensee will be kept informed on a regular basis during biweekly discussions with the project manager regarding the progress. The audit may include interactions (e.g., teleconferences, webinars, or face-to-face) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available. The face-to-face interactions would be conducted either in the vicinity of the NRC headquarters or at the licensee's site if it is determined such interactions are an effective manner to resolve issues identified during the desk portion of the audit.

**DELIVERABLES**

The NRC team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 90 days of the completion of the final audit session. The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

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 DATED JUNE 5, 2018

**DISTRIBUTION:**

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 RidsRgn2MailCenter Resource  
 KBucholtz, NRR

**ADAMS Accession No.: ML18136A828**

\* by e-mail

OFFICE	DORL/LPL2-2/PM	DORL/LPL2-2/LA	NRR/DRA/ARCB/BC*	DORL/LPL2-2/BC(A)	DORL/LPL2-2/PM
NAME	MWentzel	BClayton	KHsueh (JDozier for)	BTindell	MWentzel
DATE	6/5/18	6/4/18	5/16/18	6/5/18	6/5/18

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