



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

May 31, 2018

LICENSEE: NextEra Energy Seabrook, LLC

FACILITY: Florida Power & Light Company/NextEra Energy Fleet

SUBJECT: SUMMARY OF APRIL 25, 2018, MEETING WITH FLORIDA POWER & LIGHT COMPANY/NEXTERA ENERGY REGARDING PLANNED SUBMITTAL OF EXEMPTION REQUESTS TO SUPPORT CLOSURE OF GENERIC SAFETY ISSUE 191/NRC GENERIC LETTER 2004-02 (EPID L-2017-LRC-0000)

On April 25, 2018, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Florida Power & Light Company/NextEra Energy (the licensee) via teleconference. The purpose of the meeting was for the licensee to discuss with the NRC staff its plans for submitting exemption requests for Point Beach Nuclear Plant, Units 1 and 2 (Point Beach), and Seabrook Station, Unit No. 1 (Seabrook) as committed to in closure letters for NRC Generic Safety Issue (GSI) 191, "Experimental Studies of Loss-of-Coolant-Accident-Generated Debris Accumulation and Head Loss with Emphasis on the Effects of Calcium Silicate Insulation"/NRC Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors." The meeting notice and agenda, dated April 9, 2018, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML18099A311. A list of attendees is enclosed.

The licensee started the meeting by providing the NRC staff with an overview of its upcoming exemption requests that the licensee committed to in their closeout letters for GSI-191/GL 2004-02 for Point Beach and Seabrook. The licensee stated that the requests would be to exempt the plants from the single failure requirement found in the plants' general design criteria (GDC) and not to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.46. The licensee mentioned the GDC varied between plants since Point Beach is a pre-GDC plant, and therefore, are somewhat different than those found in Appendix A to 10 CFR 50. The licensee stated that the exemptions were needed because its analysis for region 2 breaks credits both trains of the emergency core cooling system in service. The licensee planned to have the submittal to the NRC by the end of April 2018. The licensee also stated that no amendment would be required for either plant.

The NRC staff questioned whether an exemption was the correct regulatory tool to use to address the licensee's need and whether a license amendment would be more appropriate. The NRC staff pointed out that an exemption as defined in 10 CFR 50.12 can only be granted to requirements in the regulations. The NRC staff stated that the GDC generally provided guidance to applicants for construction permits in establishing principle design criteria, and upon issuance of the operating license they become part of the licensing basis, but there are a few places in 10 CFR Part 50 where specific GDC are called out as being required. The NRC staff also pointed out for Point Beach it seemed highly unlikely an exemption would be appropriate

since its principle design criteria do not exist in the regulations since Point Beach is a pre-GDC plant. The NRC staff stated that they thought the licensee should relook at 10 CFR 50.46 and evaluate whether it would be appropriate to request an exemption from that regulation, rather than the GDC, or whether a license amendment to change their licensing basis would be more appropriate. The NRC staff suggested the licensee look at the GSI-191/GL 2004-02 closeout letters for St. Lucie Plant, and Turkey Point Nuclear Generating Plant and verify no further licensing action (exemption or amendment) would be required for those sites. The licensee agreed that it would re-evaluate what is the proper regulatory tool prior to submitting. The licensee stated this re-evaluation would mean it would exceed its commitment date in the closeout letters for Point Beach and Seabrook. The NRC staff acknowledged the delay.

No members of the public were in attendance. No public meeting feedback forms were received.

Please direct any inquiries to me at 301-415-2048 or by e-mail to Justin.Poole@nrc.gov.



Justin C. Poole, Project Manager
Plant Licensing Branch 1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250, 50-251, 50-266, 50-301,
50-335, 50-389, and 50-443

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES*

APRIL 25, 2018, MEETING WITH

FLORIDA POWER & LIGHT COMPANY/NEXTERA ENERGY REGARDING

UPCOMING EXEMPTION REQUEST TO SUPPORT

CLOSURE OF GENERIC SAFETY ISSUE 191/GENERIC LETTER 2004-02

NRC Participants:

- Victor Cusumano, Branch Chief, Division of Safety Systems (DSS), Technical Specifications Branch (STSB), Office of Nuclear Reactor Regulation (NRR)
- Stephen Smith, Senior Reactor Engineer, NRR/DSS/STSB
- Andrea Russell, Reactor Systems Engineer, NRR/DSS/STSB
- Justin Poole, Project Manager, Division of Operating Reactor Licensing (DORL), NRR

NextEra Energy Participants:

- Steve Catron, Fleet Licensing Manager
- Jarrett Mack, Fleet Principal Engineer
- Andy Zielonka, Fleet Senior Project Manager
- Lori Christensen, Point Beach Nuclear Plants (Point Beach) Licensing Project Manager
- Tom Kendall, Point Beach Principal Engineer
- Roger Clark, Point Beach Senior Engineering Analyst
- Cortney Gerbers, Point Beach Design Engineering Manager
- Jane Marean, Point Beach Civil/Mechanical Engineering Supervisor
- Christine Thomas, Seabrook Station (Seabrook) Licensing Senior Engineer
- Michael Lee, Seabrook Principal Engineer
- Paul Leonard, Technical Lead, ENERCON

* all participation was by teleconference

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DATE	05/30/2018	05/18/2018	05/30/2018	05/31/2018

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