

NRR-DMPSPeM Resource

From: Wentzel, Michael
Sent: Monday, May 21, 2018 11:26 AM
To: Catron, Steve
Cc: Kilby, Gary; Frehafer, Ken; Mike.Snyder@fpl.com
Subject: St. Lucie Plant, Unit Nos. 1 and 2 - Audit Plan and Setup of Online Reference Portal (CAC Nos. MF5372 and MF5373; EPID L-2014-LLA-0001)
Attachments: St Lucie Plant Units Nos. 1 and 2 - Plan for Audit of Facts and Observations Pertaining to LAR to Adopt RICTs.pdf

Dear Mr. Catron:

By application dated December 5, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14353A016); as supplemented by letters dated July 8 and July 22, 2016; February 15, 2017, and February 1 and March 15, 2018 (ADAMS Accession Nos. ML16193A659, ML16208A061, ML17058A181, ML18032A614, and ML18074A116, respectively), Florida Power & Light Company (FPL; the licensee) submitted a license amendment request (LAR) for St. Lucie Plant, Unit Nos. 1 and 2. The proposed amendments would revise the Technical Specifications (TSs) to Implement TS Task Force (TSTF)-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk-Informed TSTF] Initiative 4b." By letter dated November 15, 2016 (ADAMS Accession No. ML16281A021), the U.S. Nuclear Regulatory Commission (NRC) staff informed the TSTF of its decision to suspend approval of TSTF-505, Revision 1 because of concerns identified during the review of plant-specific license amendments requesting adoption of the traveler. The NRC staff is reviewing the licensee's application as a site-specific proposal to address the staff's concerns with TSTF-505, Revision 1.

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 the final report developed using Appendix X to Nuclear Energy Institute (NEI) 05-04, NEI 07-12 and NEI 12-13, "Close Out of Facts and Observations" (ADAMS Accession No. ML17079A427), for any facts and observations identified in Enclosure 2, Attachment A of the LAR. 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 support 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 final report developed using Appendix X for any facts and observations identified in Enclosure 2, Attachment A of the LAR. 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.

As discussed with you on a May 18, 2018, the conditions associated with the online reference portal must be maintained throughout the duration of the review process.

If you have any questions, please contact me at (301) 415 6459.

Sincerely,

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

Hearing Identifier: NRR_DMPS
Email Number: 382

Mail Envelope Properties (Michael.Wentzel@nrc.gov20180521112500)

Subject: St. Lucie Plant, Unit Nos. 1 and 2 - Audit Plan and Setup of Online Reference Portal (CAC Nos. MF5372 and MF5373; EPID L-2014-LLA-0001)
Sent Date: 5/21/2018 11:25:46 AM
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Created By: Michael.Wentzel@nrc.gov

Recipients:

"Kilby, Gary" <Gary.Kilby@fpl.com>
Tracking Status: None
"Frehafer, Ken" <Ken.Frehafer@fpl.com>
Tracking Status: None
"Mike.Snyder@fpl.com" <Mike.Snyder@fpl.com>
Tracking Status: None
"Catron, Steve" <Steve.Catron@fpl.com>
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	4180	5/21/2018 11:25:00 AM
St Lucie Plant Units Nos. 1 and 2 - Plan for Audit of Facts and Observations Pertaining to LAR to Adopt RICTs.pdf	64470	

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

AUDIT PLAN

REGARDING LICENSE AMENDMENT REQUEST TO ADOPT

RISK-INFORMED COMPLETION TIMES

FLORIDA POWER & LIGHT COMPANY

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

I. BACKGROUND

By application dated December 5, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14353A016); as supplemented by letters dated July 8 and July 22, 2016; February 15, 2017, and February 1 and March 15, 2018 (ADAMS Accession Nos. ML16193A659, ML16208A061, ML17058A181, ML18032A614, and ML18074A116, respectively), Florida Power & Light Company (FPL; the licensee) submitted a license amendment request (LAR) for St. Lucie Plant, Unit Nos. 1 and 2. The proposed amendments would revise the Technical Specifications (TSs) to Implement TS Task Force (TSTF)-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk-Informed TSTF] Initiative 4b." By letter dated November 15, 2016 (ADAMS Accession No. ML16281A021), the U.S. Nuclear Regulatory Commission (NRC) staff informed the TSTF of its decision to suspend approval of TSTF-505, Revision 1 because of concerns identified during the review of plant-specific license amendments requesting adoption of the traveler. The NRC staff is reviewing the licensee's application as a site-specific proposal to address the staff's concerns with TSTF-505, Revision 1.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's submittals and determined that a regulatory audit of the final report developed using Appendix X to Nuclear Energy Institute (NEI) 05-04, NEI 07-12 and NEI 12-13, "Close Out of Facts and Observations" (ADAMS Accession No. ML17079A427), for any facts and observations (F&Os) identified in Enclosure 2, Attachment A of the LAR would assist in the timely completion of the subject LAR review process. The NRC staff is continuing to review other aspects of the licensee's submittal and may identify the need for additional audit subjects by separate correspondence.

II. 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.

III. REGULATORY AUDIT SCOPE AND METHODOLOGY

The audit is being conducted to support the resolution of the issues pertaining to the F&Os identified in Enclosure 2, Attachment A of the LAR. 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 mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available.

The area of focus for the regulatory audit is the final report developed using Appendix X. for the F&Os identified in Enclosure 2, Attachment A of the LAR. The audit will be performed consistent with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (ADAMS Accession No. ML082900195).

IV. AUDIT TEAM

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

Team Member	Title	Division	Area of Responsibility
Michael Wentzel	Project Manager	NRR/DORL/LPL2	Project Management
Stephen Dinsmore	Senior Reliability and Risk Analyst	NRR/DRA/APLA	Technical Review
Jonathan Evans	Reliability and Risk Engineer	NRR/DRA/ARCB	Technical Review

V. 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 bi-weekly 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.

VI. DELIVERABLES

The NRC team will develop an audit summary report to convey the results. The report will be placed in Agencywide Documents Access and Management System (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.