



June 4, 2018

Via Electronic Mail

Ms. Annette L. Vietti-Cook, Secretary  
Office of the Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attn.: Rulemaking & Adjudications Staff  
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SUNSI Review  
Complete  
Template = ADM-013  
E-RIDS=ADM-03  
LOis M. James

COMMENT (1)  
PUBLICATION DATE:  
5/2/2018  
CITATION # 83 FR 19304

**RE: Extension of time for opportunity to request a hearing and petition for leave to intervene in the NRC's review of FPL License Renewal Application, Docket ID NRC-2018-0074**

Dear Secretary Cook:

The Natural Resources Defense Council ("NRDC") and the Friends of the Earth ("FOE") write today to respectfully request that the Nuclear Regulatory Commission ("NRC" or "the Commission") extend the deadline to request a hearing and petition for leave to intervene on the license renewal application for *Florida Power & Light Company; Turkey Point Nuclear Generating, Unit Nos. 3 and 4* (hereinafter "FPL 80-year license extension"), 83 Fed. Reg. 19304-19306 (May 2, 2018) to October 30, 2018. An extension of time is necessary for the following good cause reasons, in accordance with the factors in 10 C.F.R. § 2.309(c) providing for nontimely filings.

The license renewal application under consideration is the first request from a nuclear operator to extend the life of operating nuclear reactors to 80 years. This is an unprecedented, first of its kind request for federal approval of activities that will have significant impact on the South Florida environment and affected communities for decades to come, considering the regulatory outcome of reactor operations at Turkey Point to 2053. A detailed public review and careful consideration of the license application and the accompanying and referenced reports – comprising thousands of pages – cannot take place in a short, 60 day time span. Further, the FPL 80-year license extension contemplated here is not due to take effect *until 2032*, more than a decade away, so there is no harm to any party by the provision of a few extra months for review. Finally, much of the time requested could be lost as it comes during the summer months when many individuals, including the expert witnesses whose review is necessary for a detailed analysis of the material, are on long planned family vacations.

Thus, adequately responding in a constructive and meaningful fashion to an extensive set of documents will require a significant investment of time and energy. NRDC and FOE and their experts have already expended time to begin the review of the application and related materials. Much more time is needed. To address just the reactor aging management issues, severe accident mitigation analysis and assessments of environmental impacts, FOE and NRDC are collecting and analyzing a sizable number of documents referenced in the license renewal application. Examples of documents that will need to be reviewed by the public include the 23 pages of references in section 10.0 of the Environmental Report (ML18113A145), the many general references and information sources cited in the license renewal application (ML18113A146), and other materials. The current 60-day review period is simply insufficient time to gather and thoroughly review all the relevant documents to constructively address whether this application meets the NRC's requirements.

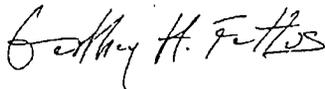
Review of these documents and information by NRDC and FOE and their experts will "assist in developing a sound record" in the proceedings. 10 C.F.R. § 2.309(c)(1)(viii).

NRDC and FOE have an important interest in this matter. Both organizations have members who live near the licensed reactors who will be directly impacted by any additional extension of the license for another 20 years beyond 2032, well past the half century mark. If the organizations are not allowed to request a hearing and intervene, substantial injury to its members may result. A demonstration of standing will be made with the intervention petition if or when it is filed.

A thorough response cannot be accomplished by July 1, 2018. In light of the upcoming August holidays, the volume of material to be analyzed, and the need to obtain the assistance of experts, we urge a 120-day extension of the current deadline to Wednesday, October 30, 2018.

Please do not hesitate to contact either of us if you have questions or concerns. Thank you for your attention and consideration of this matter.

Sincerely,



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