



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

June 12, 2018

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

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNITS 3 AND 4 - PLAN FOR THE  
IN-OFFICE REGULATORY AUDIT REGARDING THE SUBSEQUENT LICENSE  
RENEWAL APPLICATION REVIEW (EPID NO. L-2018-RNW-0002)

Dear Mr. Nazar:

By letter dated January 30, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18037A812) and supplemented through Revision 1 dated April 10, 2018 (ADAMS Accession No. ML18113A132), Florida Power & Light Company (FPL) submitted an application for subsequent renewal of Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Units 3 and 4 (Turkey Point), respectively. FPL requested renewal of the Turkey Point operating licenses for an additional 20 years beyond the current renewed 60-year current license terms, which expire on July 19, 2032, for Unit 3 and April 10, 2033, for Unit 4. The staff of the U.S. Nuclear Regulatory Commission (NRC) is reviewing this application in accordance with the guidance in NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants."

The NRC staff plans to conduct an in-office regulatory audit at NRC headquarters offices from June 18 - July 13, 2018, in accordance with the enclosed regulatory audit plan. If you have any questions, please contact me by e-mail at [Lois.James@nrc.gov](mailto:Lois.James@nrc.gov).

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

Enclosure:  
Regulatory Audit Plan

cc w/encl: Listserv

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNITS 3 AND 4 - PLAN FOR THE IN-OFFICE REGULATORY AUDIT REGARDING THE SUBSEQUENT LICENSE RENEWAL APPLICATION REVIEW (EPID NO. L-2018-RNW-0002)

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[Steve.Franzone@fpl.com](mailto:Steve.Franzone@fpl.com);  
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**ADAMS Accession Nos.** ML18160A012

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DATE	06/11/2018	06/11/2018	06/12/2018	06/12/2018
OFFICE	PM:MRPB:DMLR			
NAME	LJames			
DATE	06/12/2018			

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## **Audit Plan**

# **In-Office Regulatory Audit Turkey Point Nuclear Generating Units 3 and 4 Subsequent License Renewal Application**

**June 18-July 13, 2018**

**Division of Materials and License Renewal  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission**

Enclosure

**Audit Plan  
In-Office Regulatory Audit  
Turkey Point Nuclear Generating Units 3 and 4  
Subsequent License Renewal Application**

**1. Background**

By letters dated January 30, 2018, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18037A812), February 9, 2018 (ADAMS Accession No. ML18044A653), February 16, 2018 (ADAMS Accession No. ML18053A123), March 1, 2018 (ADAMS Accession No. ML18072A224), and April 10, 2018 (ADAMS Accession Nos. ML18102A521 and ML18113A132), Florida Power & Light Company (FPL) submitted an application for subsequent license renewal of Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Units 3 and 4 (Turkey Point). Turkey Point requested renewal of the operating license for an additional 20 years beyond the current renewed 60-year current license term, which expires on July 19, 2032 for Unit 3 and April 10, 2033 for Unit 4. In accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, the staff of the U.S. Nuclear Regulatory Commission (NRC) will perform an in-office regulatory audit to gain a better understanding of (1) FPL's methodology to identify the systems, structures and components (SSCs) to be included within the scope of license renewal and subject to an aging management review (AMR), and (2) FPL's aging management programs (AMPs), AMR items, Time-Limited Aging Analyses (TLAA) and associated bases and documentation as applicable.

**2. Regulatory Audit Bases**

License renewal requirements are specified in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Guidance is provided in NUREG-2192, Rev. 0, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants" (SRP-SLR), dated July 2017, and NUREG-2191, Rev. 0, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report," dated July 2017.

**3. Regulatory Audit Scope**

Scoping and Screening Review

The range of scoping and screening review of this regulatory audit is to review the applicant's scoping and screening methodology used to identify SSCs within the scope of license renewal and subject to aging management review. The review is performed to evaluate the scoping and screening process as documented in the license renewal application, implementing procedures, reports and drawings, such that the NRC staff:

- Obtains an understanding of the process used to identify the SSCs within the scope of license renewal and to identify the structures and components subject to an aging management review.
- Has sufficient docketed information to allow the NRC staff to reach a conclusion on the adequacy of the scoping and screening methodology as documented and applied.

### AMP, AMR, and TLA Review

The scope of the AMP, AMP, and TLA review of this regulatory audit is to: (a) examine FPL's AMPs, AMR items, and TLAs for Turkey Point; (b) verify FPL's claims of consistency with the corresponding GALL-SLR Report AMPs, and AMR items, and (c) assess the adequacy of the TLAs. Enhancements and exceptions will be evaluated on a case-by-case basis. The NRC staff's review of enhancements and exceptions will be documented in the safety evaluation report.

During this portion of the audit, the NRC staff will audit Program Elements 1 - 10 (scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions for general recommendations such as compliance with Appendix B, confirmation process, administrative controls, and operating experience) of the applicant's AMPs against the elements of the associated AMP described in the GALL-SLR Report. In addition, the NRC staff will verify that the conditions at the plant are bounded by the conditions for which the GALL-SLR Report program was evaluated.

The NRC staff will also examine the applicant's program bases documents and related references for AMPs, AMR items, and TLAs, and interview applicant representatives to obtain additional clarification. Walk downs, if necessary will be performed in a subsequent audit to be performed onsite.

The NRC staff will use risk insights to inform the prioritization of its review of documentation associated with AMPs, AMR items, and TLAs. The NRC staff will use risk insights to focus the breadth and depth of its review of plant specific operating procedures and operating experience. However, the NRC staff's review is not limited to risk significant systems and components because 10 CFR Part 54 is a deterministic rule and the NRC staff must conclude that there is reasonable assurance that activities will continue to be conducted in accordance with the current licensing basis and the effects of aging will be managed during the period of extended operation for all structures and components within the scope of Part 54.

The NRC staff has reviewed the list of risk significant systems and components provided as part of the pre-application meeting for scoping and screening methodology and documented in the meeting summary (ADAMS Accession No. [ML18081A293](#)).

#### **4. Information and Other Material Necessary for the Regulatory Audit**

For the in-office audit June 18 – July 13, 2018, the project team will review the license renewal application, as supplemented and revised, the AMP basis documents and other FPL supporting documents as appropriate and requested

- The project team would like continued FPL document review capability via the document portal. Document requests for upload to the portal shall be made as needed via the NRC safety project manager to the appropriate Entergy licensing manager.
- The NRC staff would like to hold break-out sessions, via telephone conference calls and/or official internet-based desktop sharing means, with FPL and Turkey Point subject matter experts to discuss various basis documents, references, condition/corrective action reports, and interview FPL representatives to obtain additional clarification related to the license renewal review. Break-out sessions for various technical review areas will

occur at predesignated time slots during the audit, with preassigned NRC and FPL representatives. NRC staff will provide discussion topics and technical requests and questions to the NRC safety project manager, who will then relay the information to the FPL licensing manager. All break-out sessions will be coordinated via the NRC safety project manager and the FPL licensing manager.

**5. Team Assignments**

Name	Responsibility
L. James	Project Manager
B. Rogers	Reviewer - Reactor Engineer
B. Fu	Reviewer - Mechanical
J. Gavula	Reviewer - Mechanical
W. Holston	Reviewer - Mechanical
A. Buford	Reviewer - Structural
S. Cuadrado de Jesus	Reviewer – Structural
D. Hoang	Reviewer – Structural
B. Lehman	Reviewer – Structural
J. Lopez	Reviewer – Structural
A. Prinaris	Reviewer – Structural
C. Sydnor	Reviewer – Structural
G. Thomas	Reviewer – Structural
R. Beaton	Reviewer-Reactor Systems
D. Nold	Reviewer-Reactor Systems
D. Nguyen	Reviewer-Electrical
F. Sacko	Reviewer-Electrical
M. Sadollah	Reviewer-Electrical
N. Iqbal	Reviewer-Fire Protection
B. Allik	Reviewer-Materials
C. Fairbanks	Reviewer-Materials
A. Johnson	Reviewer-Materials
A. Huynh	Reviewer-Materials
R. Kalikian	Reviewer-Materials
J. Poehler	Reviewer-Materials
A. Rezia	Reviewer-Materials
O. Yee	Reviewer-Materials
W. Gardner	Reviewer-General Scientist
A. Chereskin	Reviewer-Chemical Engineer
M. Yoder	Reviewer-Chemical Engineer

## **6. Logistics**

The regulatory audit will be conducted as an in-office (at NRC HQ) audit from June 18, 2018, to July 13, 2018. Entrance and exit briefings will be held at the beginning and end of the in-office audit via conference calls. Status calls during the in-office (at NRC HQ) audit will occur at least weekly, more if deemed necessary.

## **7. Special Requests**

The NRC staff requests the applicant to make available the license renewal application program basis documentation and license renewal drawings, and other documents as requested for independent searches by the regulatory audit team via the Curtiss-Wright eDocs portal.

## **8. Deliverables**

An audit report should be issued to FPL within 90 days from the end of the audit.