



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

July 3, 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 - IN-OFFICE  
REGULATORY AUDIT PLAN REGARDING SEVERE ACCIDENT MITIGATION  
ALTERNATIVES IN THE SUBSEQUENT LICENSE RENEWAL APPLICATION  
REVIEW (EPID NO. L-2018-LNE-0001)

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 NRC staff plans to conduct an in-office regulatory audit at NRC headquarters offices from July 5-13, 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 - IN-OFFICE REGULATORY AUDIT PLAN REGARDING SEVERE ACCIDENT MITIGATION ALTERNATIVES IN THE SUBSEQUENT LICENSE RENEWAL APPLICATION REVIEW (EPID NO. L-2018- LNE-0001)

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## **Audit Plan**

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

**July 5-13, 2018**

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

Enclosure

**Audit Plan  
In-Office Regulatory Audit  
Severe Accident Mitigation Alternatives  
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. The staff is reviewing the information contained in the environmental report (ER) of the subsequent license renewal application (SLRA) per Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54).

As part of the staff's review, a severe accident mitigation alternatives (SAMA) audit will be conducted for the Turkey Point's SLRA. This audit is conducted with the intent to gain understanding, to verify information, and to identify information that will require docketing to support the basis of the licensing or regulatory decision. Specifically, the NRC staff will identify pertinent SAMA information and data, and obtain clarifications regarding information provided in the ER.

Per NRC guidance, the NRC staff prepares a regulatory audit plan that provides a clear overview of audit activities and scope, team assignments, and schedule.

**2. Regulatory Audit Bases**

License renewal requirements are specified in 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Licensees are required by 10 CFR 54.23 to submit an ER that complies with the requirements in 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," as part of the SLRA. Review guidance for the staff is provided in NUREG-1555, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants: Supplement 1 – Operating License Renewal."

Section 51.53(c)(3)(ii)(L) of 10 CFR states that "If the staff has not previously considered severe accident mitigation alternatives for the applicant's plant in an environmental impact statement or related supplement or in an environmental assessment, a consideration of alternatives to mitigate severe accidents must be provided." Turkey Point provided a SAMA analysis in the 2003 ER for the initial license renewal application. Thus, the applicant's SLRA ER must contain any new and significant information of which the applicant is aware (10 CFR 51.53(c)(iv)) which could affect the previous SAMA determinations.

### 3. Regulatory Audit Scope

The purpose of the SAMA audit is to review the new and significant evaluation as it relates to the SAMA analysis and results as documented in the Turkey Point SLRA ER and supporting documents.

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

For the in-office audit July 5-13, 2018, the project team will review the SLRA, as supplemented and revised, the ER and other FPL supporting documents as appropriate and requested:

- Please make available the documents provided on the portal, including:
  - The most recent PRA Peer Review and/or self-assessment reports for all hazards.
  - SAMA New and Significant Basis Document
  - Available documentation of the review of the results of the Turkey Point Level 2 PRA used in the analysis to confirm that the model is representative of the plant and the results are reasonable
- 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 FPL 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 or contractor subject matter experts personnel knowledgeable of Turkey Point Level 1, 2 and 3 PRA development and results, as well as SAMA identification and evaluation.

### 5. Team Assignments

Name	Responsibility
L. James	Senior Project Manager
J. Dozier	Senior Reliability and Risk Analyst

### 6. Logistics

The regulatory audit will be conducted as an in-office (at NRC HQ) audit from July 5-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 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.