



October 24, 2018
L-2018-198
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D C 20555-0001

RE: Turkey Point Nuclear Plant, Unit 3 and 4
Docket Nos. 50-250 and 50-251
Renewed Facility Operating Licenses DPR-31 and DPR-41

Requested Approval for License Amendment Request 265, Revise NFPA 805 License Condition for Reactor Coolant Pump Seals

Reference:

1. FPL letter L-2018-170, License Amendment Request 265, Revise NFPA 805 License Condition for Reactor Coolant Pump Seals, October 17, 2018 (ADAMS Accession No. ML18290A862)
2. NRC letter to Westinghouse Owners Group, "Final Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report WCAP-16175-P, Revision 0, (CE NPSD-1199, Revision 1) "Model for Failure of RCP Seals Given Loss of Seal Cooling in CE NSSS Plants" (TAC No. MB5803)" dated February 12, 2007 (ADAMS Accession No. ML070240429)

In Reference 1, Florida Power & Light Company (FPL) submitted license amendment request (LAR) 265, "Revise NFPA 805 License Condition for Reactor Coolant Pump Seals", for Turkey Point Nuclear Plant Units 3 and 4 (Turkey Point). The proposed amendments remove reliance on the Flowserve Reactor Coolant Pump (RCP) Seal Topical Report as a condition of Turkey Point's transition to NFPA 805, and document the application of WCAP-16175-P-A (Reference 2) for modeling RCP seal leakage in the Turkey Point Probabilistic Risk Assessment (PRA).

In a discussion with the NRC, the staff requested that FPL specify a requested approval date and implementation period for LAR 265. This letter serves as FPL's request for LAR 265 approval by April 1, 2019 with implementation to be completed within 30 days thereafter. The requested approval supports the planned Unit 4 refuel outage schedule.

This letter contains no new or revised regulatory commitments. This supplemental information does not alter the conclusion in Reference 1 that the proposed changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the proposed changes.

Should you have any questions regarding this matter, please feel free to contact me at (305) 246-4112.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robert Hess', is written over a horizontal line.

Robert Hess
Manager, Turkey Point Licensing
Florida Power & Light Company

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant
Ms. Cindy Becker, Florida Department of Health