



December 30, 2020

L-2020-174

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Revised Commitment for Open Phase Condition Implementation

References:

1. Florida Power & Light Company letter L-2018-196 "Revised Implementation Schedule for Open Phase Condition," November 12, 2018 (ML 18318A302)
2. Nuclear Energy Institute letter "Industry Initiative on Open Phase Condition, Revision 2," September 20, 2018 (ML 18268A114)
3. Nuclear Energy Institute letter "Industry Initiative on Open Phase Condition Revision 3," June 6, 2019 (ML19163A176)
4. NEI 19-02, "Guidance for Assessing Open Phase Condition Implementation Using Risk Insights, Revision 0," May 2019 (ML 19172A086)

Per FPL letter L-2018-196 (Reference 1), Florida Power & Light Company (FPL) notified the NRC that Turkey Point Units 3 and 4 would adhere to the implementation schedule for the Industry Initiative on Open Phase Condition, Revision 2 (Reference 2). The purpose of this letter is to notify the NRC of FPL's decision to follow the guidance provided in Revision 3 of the NEI Industry Initiative on Open Phase Condition (Reference 3) for Turkey Point Units 3 and 4.

FPL completed the risk evaluation for Turkey Point Units 3 and 4 in accordance with Revision 3 of NEI Industry Initiative on Open Phase Condition (Reference 3) and the NRC endorsed NEI guidance for risk-based assessment of Open Phase Condition Implementation (Reference 4). The evaluation results support FPL's decision to operate the Open Phase Condition Protection System (OPCPS) without the automatic trip function enabled and rely on operator action cued by the OPCPS alarm functions. The existing plant procedures and guidance for addressing an open phase condition implemented during the "extended monitoring period" at Turkey Point Units 3 and 4 will continue to be in effect.

If there are any questions, please contact me at (305) 246-4112.

Sincerely,

A handwritten signature in black ink that reads "Robert Hess for".

Robert Hess
Licensing Manager
Turkey Point Nuclear Plant

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Plant