



Turkey Point Unit 3 and Unit 4

Reactor Protection System Engineered Safety Feature Actuation System Nuclear Instrumentation System Replacements

**Safety System Replacement Project LAR
NRC 6th Pre-submittal Meeting Telecon**

July 22, 2021

OPEN MEETING

Agenda – Open and Closed Sessions

- **Open Session**
 - FPL License Amendment Request (LAR) Submittals
 - Vendor Oversight Plan Update and Detail Discussion
 - Next Pre-submittal Meeting Agenda Items
- **Closed Session**
 - Diverse Actuation System (DAS) Architecture and Reliability
 - Leak-Before-Break Discussion on D3
 - Modification Code Year Discussion for LAR

Introductions – Project Team

- **FPL Nuclear Licensing**
 - Steve Catron – Licensing Fleet Manager
 - Jarrett Mack – Fleet Licensing Lead
 - David Stoia – Turkey Point Site Licensing Lead
 - Bill Maher – Improved Technical Specification Project Director
- **FPL Nuclear Engineering**
 - Brian Dunn – Fleet Design Director
 - Phil Barnes – Design Engineering Manager
 - Wes Frewin – Fleet Digital Design Supervisor
 - Warren Busch – Project Engineer
 - Phillip Tiemann – Fuels / Safety Analysis
- **Framatome**
 - Ron Legrand – Project Manager
 - Brian Haynes – Licensing Lead
 - Taha Abdelnaeem - Engineering Lead
 - Ted Quinn – Licensing Engineer
 - Jerry Mauck – Licensing Engineer
 - Ron Jarrett – Licensing Engineer
 - Bill Hannaman – Licensing Engineer
 - Michael Howard – Safety Analysis
 - Tom Geary – Design Engineering
- **Sargent & Lundy -Third Party Review**
 - Pareez Golub

FPL LAR Submittals

- **Follow-up to remarks on resource and schedule challenges**
 - 3 submittals under NRC review concurrently for PTN; two apply to PTN for ITS and RPS/ESFAS System Replacements
- **Improved Standard Technical Specification (ITS)**
 - Changes within scope of NUREG 1431, Rev. 5
 - Regular communications with NRC TS Branch on scope control
- **RPS/ESFAS System Replacements**
 - LAR approval Fall 2022 provides confidence in planning for PTN Unit 3 Spring 2023 outage. FPL supports:
 - Minimize applications that are first time NRC reviews
 - Frequent interaction before submittal and during reviews
 - Quick turnaround on requests for information
 - Open to discuss other time-savings measures

Vendor Oversight Plan Status Update

- **Plan issued, currently Revision 0, LAR summary in draft**
- **Oversight of Framatome issued documents in progress**
 - Documented in comment resolution forms
 - Traceable transmittals between Framatome and FPL
 - Review task reconciling with production schedule activities
- **Audits and Inspections performed**
 - Performed at Lynchburg and Mansfield facilities
 - Quality Assurance initial program audits
 - Cyber Security inspection of Secure Development Environment
 - Documented in Quality Assurance Reports

Vendor Oversight Plan and Summary Level of Detail

Document Type	Intended Process	Level of detail intended to support
LAR Summary	Docketed, revised only upon deviation	<ul style="list-style-type: none"> • Basis for safety evaluation determinations • Threshold for NRC notification of changes
Vendor Oversight Plan (VOP)	Available, updated during project	<ul style="list-style-type: none"> • Basis for VOP LAR summary • Planning of oversight activities, schedule Identifiers • Document performed activities, roadmap
Implementation	Inspection, FPL maintained documents	<ul style="list-style-type: none"> • Specific document number and revision • Specific reviewers • Comments and resolutions/acceptance • Corrective Action Program (not affecting LAR summary)

Vendor Oversight Plan Summary Detail (1 of 2)

Criteria/Content	Evaluated for LAR Change (examples)	Not impacting LAR summary
Organization Procedure structure	<ul style="list-style-type: none"> • Changes of oversight responsibility to different organization • Oversight required outside the procedure structure 	<ul style="list-style-type: none"> • Changes to personnel in defined roles • Delegation of activities
Scope of Activities	<ul style="list-style-type: none"> • Document or task of a type listed in the summary is removed from scope of review • Addition of a significant document or task of a type not in summary • Changes to the LAR that warrant update of VOP Summary 	<ul style="list-style-type: none"> • Adding documents or tasks of a type listed • Document revisions • Changes to schedule • Combination of documents into fewer
Methods	<ul style="list-style-type: none"> • Use of other than QA audits, comment resolution forms, reports with FPL approval, or the corrective action program to document oversight • Change to a procedure that effects responsibility or relaxes acceptance criteria for an oversight task 	<ul style="list-style-type: none"> • Transmittal of oversight related information or results to vendor • Procedure revisions that do not affect scope or acceptance criteria

Vendor Oversight Plan Summary Detail (2 of 2)

Criteria/Content	Evaluated for LAR Change (examples)	Not impacting LAR summary
Acceptance criteria	<ul style="list-style-type: none"> • If oversight activities cannot be performed to completion or comprehensive of scope for software development activities • If vendor conformance to LAR stated implementation cannot be achieved. 	<ul style="list-style-type: none"> • Justified changes to code and standards applicable to a document • Changes to document specific acceptance criteria
Corrective Action	<ul style="list-style-type: none"> • Corrective Action Program used to determine what actions necessary. 	<ul style="list-style-type: none"> • CR for defect in a document found after document issued final • CR to document the performance/results of an oversight activity

end of topic

Future Pre-submittal Meeting Recommended Agenda Items

- **Open items**
- **Equipment replacement scope outside Tricon SER**
- **Command Prioritization**
- **Commercial grade dedication/qualification status**
- **Human Factors Engineering and simulator schedule**
- **Implementation Items**
- **Attachments to the LAR**

Thank you!

Questions/Comments?