



## **NRC Pre-Submittal Meeting**

### **St. Lucie and Turkey Point Nuclear Plants**

#### **IMPROVED TECHNICAL SPECIFICATION Conversion**

**August 18, 2021**

# **Draft Amendment Materials** **Subject to Change**

## Agenda

- Introduction
- Improved Technical Specification (ITS) Project Status
- ITS Conversion Schedule
- FPL and NRC Interactions During License Amendment Request (LAR) Review
- Beyond Scope Items
- Potential Plant Implementation Impacts
- Questions?

## **Assist in planning resources to provide an efficient review process**

### Introduction

#### Purpose of Meeting

- Brief the NRC staff on the upcoming ITS Conversion license amendment request
- Provide an update on the status of the ITS Conversion Projects at St. Lucie and Turkey Point Plants
- Provide information to the NRC staff to support planning NRC resources in preparation for the review

## Experienced team members and vendor

### Introduction (continued)

#### Licensee Attendees:

- FPL
  - William Maher – ITS Project Manager
  - Jarrett Mack – Corporate Licensing Core Team
  - Mark Formoso – Turkey Point Core Team Lead
  - David Stoia – Turkey Point Site Licensing Core Team Member
  - Fred Pollak – St. Lucie Core Team Lead
  - Rick Sciscente – St. Lucie Site Licensing Core Team Member
  
- EXCEL Services
  - Gregg Ellis – St. Lucie Project Lead
  - Charles DeDeaux – Turkey Point Project Lead

## Project schedule on track for submittal in September 2021

### ITS Project Status

#### Current Status of LAR

- ITS sections have been drafted in accordance with NUREG-1431, -1432 Rev. 5
  - FPL Review and Comment Incorporation complete
  - Verification of validation sources per the FPL LAR process
  - Core Team at Turkey Point and St. Lucie (Ops, Licensing, Engineering, including Safety Analysis)
- St. Lucie final ORG subcommittee package reviews are in progress
- Turkey Point ORG subcommittee package reviews are complete
- ITS Conversion Integrated Review is in progress
- Validation package development is in progress
- LAR preparation (e.g., cover letter, other enclosures, list of commitments, etc..) in progress for submittal

## **Project schedule on track for submittal in September 2021**

### ITS Project Status (continued)

#### Sensitive or Proprietary Information

- None identified

#### Beyond Scope Items

- There are a few changes that have been identified as possible beyond scope items as defined in LIC 601
  - ITS requirements that are different from the Current Technical Specifications (CTS) and the Improved Standard Technical Specifications (ISTS)
- This type of change has historically been referred to as a “Beyond Scope Item” or BSI
- Details of beyond scope items will be discussed later in the presentation

## Project schedule on track for submittal in September 2021

### Anticipated ITS Conversion Schedule

	St. Lucie (PSL)	Turkey Point (PTN)
LAR Submittal	September 2021	September 2021
NRC Approval	September 2022	September 2022
ITS Implementation	Following U1 Fall 2022 Outage	Fall 2022 to coincide with PSL Implementation

**FPL anticipates fostering a timely, open and collaborative approach using the latest NRC review processes to achieve mutual trust and respect between our staff, NRC staff & management**

### FPL and NRC Interactions During LAR Review

- Interaction activities will be coordinated between the licensee and the NRC Project Manager in accordance with established NRC processes
  - Pre-submittal activities (e.g., planning & public pre-application meetings)
  - Routine resource and planning meetings
- Key drivers for a successful review from “Review of the Clinch River Nuclear Site Early Site Permit Application dated April 2021” (ML19190A078); p. 11:

*“A well-structured pre-application process ... Enhanced use of audits as an important review tool ... For safety reviews, focus on the risk-significant elements of the review will help reduce review costs and improve the timeliness of application reviews ... The use of an eRR [electronic Reading Room] to post documents and supporting files was useful ...”*

## **FPL anticipates fostering a timely, open and collaborative approach using the latest NRC review processes to achieve mutual trust and respect between our staff, NRC staff & management**

### FPL and NRC Interactions During LAR Review (continued)

- Use of Audits
  - From “Review of the Clinch River Nuclear Site Early Site Permit Application dated April 2021” (ML19190A078):

*“Thoroughly planned and executed audits that were focused and well-coordinated with the applicant. These audits provided forums for enhancing mutual understanding of technical and regulatory issues and questions and helped to reduce the number of requests for additional information (RAIs) for both the safety and environmental reviews.”*
  - Use of focused (topic-specific) breakout audits as part of the Subsequent License Renewal has been helpful in the communication between our staff and the NRC staff
  - Audit sessions resulted in Request for Additional Information (RAI) and Request for Confirmation of Information (RCI) (ML20112L770) to provide information required by the NRC staff to complete the Safety Evaluation Report (SER)
  - Public Meetings are held, as needed, post-audit

**FPL anticipates fostering a timely, open and collaborative approach using the latest NRC review processes to achieve mutual trust and respect between our staff, NRC staff & management**

FPL and NRC Interactions During LAR Review (continued)

- Electronic reading rooms (eRRs)
  - eRRs providing real-time information to facilitate NRC staff review
    - Used very successful for our recent Subsequent License Renewal projects
    - Common practice for other “smaller” LARs
  - Supporting information reviewed in conjunction with audit materials reduces the time needed in the application review schedule and minimizes potential RAIs

## Total number of Beyond Scope Items is small in comparison to other ITS Conversions

### Beyond Scope Items

#### St. Lucie

- Change to ESFAS MSIS manual and automatic actuation logic Applicability and action change to match the supported system's Technical Specifications actions. The change is not technical in nature, but rather aligns the MSIS instrumentation actions with the supported system actions.
- RCP Flywheel Program restoring previously approved program requirements in addition to current requirements based on the RCP Flywheel material. Both testing methods have been previously approved by the NRC for PSL.
- Add RICT to U1 ESFAS automatic actuation logic and U2 ESFAS MSIS manual actuation. The change is supported by the existing RICT Program and configuration risk management program previously approved in License Amendments 247 and 199, respectively. U2 ESFAS automatic actuation logic already applies RICT and both Unit 1 and Unit 2 (except U2 MSIS manual channels) already apply RICT.
- ITS Section 5.5. Programs containing periodic frequencies not imposed by a rule are proposed to be relocated to the Surveillance Frequency Control Program (SFCP). This deviation from ISTS Rev. 5 and TSTF-425 has been previously approved for at least three (3) plants. PSL currently has an approved SFCP.

## Total number of Beyond Scope Items is small in comparison to other ITS Conversions

### Beyond Scope Items

#### Turkey Point

- ITS Section 5.5. Programs containing periodic frequencies not imposed by a rule are proposed to be relocated to the Surveillance Frequency Control Program (SFCP). This deviation from ISTS Rev. 5 and TSTF-425 has been previously approved for at least three (3) plants. PTN currently has an approved SFCP.

## **FPL will work to minimize schedule delays to prevent potential plant implementation impacts**

### Potential Plant Implementation Impacts

ITS Implementation of St. Lucie is planned to occur the last quarter of 2022, as soon as practicable following U1 Outage:

- St. Lucie U2 Outage scheduled for 1<sup>st</sup> quarter 2023 – LAR approval delay could result in pushing ITS Implementation beyond 1<sup>st</sup> quarter 2023 outage
  - Outage Planning for U2 2023 outage anticipates ITS will be implemented soon after U1 2022 outage (Fall 2022). Shifting back to CTS due to delay in ITS approval before an outage would have a significant impact on outage planning, schedule, and performance

## **FPL will work to minimize schedule delays to prevent potential plant implementation impacts**

### Potential Plant Implementation Impacts (continued)

Approved Turkey Point ITS Amendment is planned to be implemented in Fall of 2022 and prior to issuance of the Safety System Digital Upgrade Modification Amendment:

- It is anticipated that the ITS Amendment will be issued prior to issuance of the Safety System Digital Upgrade Modification Amendment – Delay of ITS approval would be problematic due to the potential of approving the digital upgrade amendment which has a long installation period.
- This would have the adverse effect of:
  - Extending ITS Amendment Issuance until after the Digital Modification is installed at each site; or
  - May require several subsequent Amendments to maintain alignment of the ITS with the actual plant design.
- Turkey Point Initial Licensed Operator L23 class beginning around July 2022 will train and be examined on ITS in anticipation of ITS Implementation in the Fall of 2022. NRC Exam development will begin latter part of 2022 and Exam is scheduled for February 2023 – ITS approval delay could result in holding up new licensed operators (impractical to train on CTS and ITS).

# Questions

**We look forward to working with you and your ITS Conversion Review Team  
Thank you very much for your time and participation**