



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

September 14, 2022

LICENSEE: NEXTERA ENERGY INC./FLORIDA POWER & LIGHT COMPANY

FACILITIES: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2; SEABROOK STATION, UNIT NO. 1; ST. LUCIE PLANT, UNIT NOS. 1 AND 2; AND TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4, AND NOS. 6, AND 7

SUBJECT: SUMMARY OF FEBRUARY 16, AND MAY 18, 2022, MEETINGS WITH NEXTERA ENERGY/FLORIDA POWER & LIGHT COMPANY REGARDING PLANNED SUBMITTAL OF LICENSE AMENDMENT REQUEST FOR A COMMON FLEET EMERGENCY PLAN (EPID L-2022-LRM-0015)

On February 16, 2022, and May 18, 2022, Observation public meetings were held between the U.S. Nuclear Regulatory Commission (NRC, or the Commission) and representatives of NextEra Energy Inc./Florida Power & Light Company (the licensee) via webinar. The purpose of the meetings was to discuss the licensee's plan to submit a license amendment request to consolidate the site emergency plans into a single fleet-wide emergency plan that would be applicable to Point Beach Nuclear Plant, Units 1 and 2; Seabrook Station, Unit No. 1; St. Lucie Plant, Unit Nos. 1 and 2; and Turkey Point Nuclear Generating Unit, Nos. 3 and 4. The meeting notices and agenda, dated February 1, 2022, and May 4, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession Nos. ML22032A172 and ML22124A218, respectively. A list of attendees for the February 16, 2022, meeting is provided as Enclosure 1 and a list of attendees for the May 18, 2022, meeting is provided as Enclosure 2.

The licensee's slide presentations are included as Enclosure 3 for the February 16, 2022, meeting and Enclosure 4 for the May 18, 2022, meeting. The content in the slide presentations between the two meetings is very similar, with the May 18, 2022, meeting containing more detail than the February 16, 2022, meeting. During the meetings, the licensee discussed how they intend to submit a license amendment request for their operating fleet to consolidate to one emergency plan, vice each site having a separate emergency plan. The licensee also stated that the submittal is currently planned for in the third quarter of 2022. The licensee stated that this consolidated plan would follow the guidance found in NUREG-0654, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, Revision 2, with some exceptions. Most of the discussion between the NRC staff and the licensee, during both meetings, involved these exceptions. The NRC staff requested that the licensee provide clear and detailed justification for any deviation from the approved guidance. The NRC staff pointed the licensee to Regulatory Issue Summary 2016-10, *License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation*, as additional staff guidance when preparing the license amendment request. Specifically, this was discussed when the licensee's presentation mentioned certain positions not being staffed until 90 minutes as opposed to 60 minutes found in NUREG-0654, Revision 2.

During the presentation, the licensee stated that it was building a remote support center near its headquarters in Florida. While the licensee stated that it would be used as an extension of the

local technical support centers and emergency offsite facilities for each site, they also stated that certain functions, specifically engineering support, would come from this remote support center. The NRC staff stated that depending on how the licensee intends to use this support center in its license amendment application, Commission involvement may be required, as movement of a technical support center or emergency offsite facility function to some other facility even further away from the site, may fall outside of the authority the Commission has granted the NRC staff to approve on its own. The NRC staff stated that Commission involvement would increase the number of hours the NRC staff would estimate it would need to complete the review, as well as go beyond the 12-month review the licensee said it would request in its presentation. The licensee also stated that the application may need to be supplemented in the future as site annexes get finalized. The NRC staff stated that the licensee should describe commitments of future changes in as much detail as possible to facilitate the staff's acceptance review.

Regarding Turkey Point Nos. 6 and 7, in the February 16, 2022, meeting, the licensee stated that the license amendment request planned to be submitted in 2022 will not include Turkey Point Nos. 6 and 7. The licensee stated it would submit another license amendment to include Turkey Point Nos. 6 and 7 to the fleet emergency plan, whenever they commit to starting construction. Turkey Point Nos. 6 and 7 were not discussed in the May 18, 2022, meeting.

For the February 16, 2022, meeting there were no members of the public in attendance and no Public Meeting Feedback Forms were received. For the May 18, 2022, there were members of the public in attendance, but no comments or questions were received. No Public Meeting Feedback forms were received.

Please direct any inquiries to me at 301-415-2048, or via email at [Justin.Poole@nrc.gov](mailto:Justin.Poole@nrc.gov).

*/RA/*

Justin C. Poole, Project Manager  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250, 50-251, 50-266,  
50-301, 50-335, 50-389,  
and 50-443

Enclosures:

1. List of Attendees for February 16, 2022
2. List of Attendees for May 18, 2022
3. Licensee Presentation for February 16, 2022
4. Licensee Presentation for May 16, 2022

cc: Listserv

LIST OF ATTENDEES

FEBRUARY 16, 2022, MEETING WITH NEXTERA ENERGY/FLORIDA POWER & LIGHT

FLEET EMERGENCY PLAN LICENSE AMENDMENT REQUEST

NRC Participants:

- Justin Poole, Project Manager
- Mike Norris, Senior Emergency Preparedness Specialist
- Bruce Musico, Senior Emergency Preparedness Specialist
- Kenneth Mott, Emergency Preparedness Specialist
- Raymond Hoffman, Emergency Preparedness Specialist

NextEra Energy/FPL Participants:

- William Maher
- Noah Narut
- John Egdorf
- Kimberly Castle
- David Currier
- Steve Catron
- Wyatt Godes
- Mike Geier
- Matthew Levander
- Boyd Beltz
- Cynthia Cashwell
- Michael Finnegan
- Steve Franzone
- Peter Polfleit
- Dave Rodham
- Lauren Alfonso
- Michael Davis
- Scott McCain
- Steven Hamrick
- Ron Markovich

Public:

None

LIST OF ATTENDEES

MAY 18, 2022, MEETING WITH NEXTERA ENERGY/FLORIDA POWER & LIGHT

FLEET EMERGENCY PLAN LICENSE AMENDMENT REQUEST

NRC Participants:

- Justin Poole, Project Manager
- Natreon Jordan, Project Manager
- Mike Norris, Senior Emergency Preparedness Specialist
- Bruce Musico, Senior Emergency Preparedness Specialist
- Raymond Hoffman, Emergency Preparedness Specialist

NextEra Energy/FPL Participants:

- William Maher
- Noah Narut
- John Egdorf
- Kimberly Castle
- David Currier
- Michael Finnegan
- Steve Franzone
- Peter Polfleit
- Dave Rodham
- Michael Davis
- Scott McCain
- Ron Markovich
- Jerry Phillabaum
- Michael Williams
- Denny Smith
- Cynthia Cashwell
- Richard Orthen
- Eric Schultz

Public:

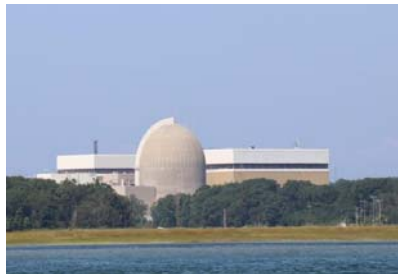
- A representative of Curtis-Wright

Enclosure 3



## **Pre-Submittal Meeting to Discuss Upcoming NextEra Plans for Submission of Common Fleet Emergency Plan**

**February 16, 2022**



## Agenda

- **NextEra Participants & Purpose**
- **Regulatory Requirements and Guidance**
- **Evaluation Approach (including Precedents)**
- **Description of Changes**
- **Submittal Scope**
- **Schedule**
- **Conclusion**

## **NextEra Participants**

**William Maher, Sr. Director – Nuclear Licensing Projects**

**Steve Catron, Director - Regulatory Affairs**

**Noah Narut, Fleet Emergency Preparedness Manager**

**Denny Smith, Emergency Preparedness Manager - Point Beach  
NextEra Energy Point Beach LLC**

**David Currier, Emergency Preparedness Manager – Seabrook  
NextEra Energy Seabrook, LLC**

**Peter Polfleit, Emergency Preparedness Manager – St. Lucie  
Florida Power & Light Co.**

**Cynthia Cashwell, Emergency Preparedness Manager – Turkey Point  
Florida Power & Light Co.**





## Purpose

**Purpose of upgrading all our sites to NUREG-0654 (Revision 2):**

- **Operate in the newest, most up-to-date regulatory environment**
- **Re-baselining of the Emergency Plans**
- **Technology Enhancements**

## Regulatory Requirements and Guidance

- **10 CFR 50.47, “Emergency Plans”**
- **10 CFR 50 Appendix E, “Emergency Planning and Preparedness for Production and Utilization Facilities”**
- **10 CFR 50.54(q), “Conditions of Licenses - Emergency Plans”**
- **NUREG-0654/FEMA-REP-1 Revision 2, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”**

## Evaluation Approach

- Differences between the proposed NextEra Fleet Emergency Plan and the current station's emergency plans or NUREG-0654 Revision 2 will show continued adequate emergency preparedness and continued safety
- NextEra is anticipating using:
  - Precedents from other dockets
  - Technological and program advancements
  - Functional analysis to be performed to support staffing changes

*The submission of the Common Fleet Emergency Plan is currently being developed and is subject to change*



## Description of Changes

- **Combine separate emergency plans into a NextEra Fleet Emergency Plan with site-specific annexes**
- **NextEra Fleet Emergency Plan will be developed consistent with NUREG-0654 Revision 2, with exceptions**
  - Each NUREG-0654 evaluation criterion (planning element) is explicitly stated, followed by a description of how the criterion is addressed
- **Deviations from the standard with respect to the current emergency plan and NUREG-0654 Revision 2 will be justified to show continued adequate emergency preparedness**

## Description of Changes

- **NextEra Command Center / Remote Response**
  - NECC is a remote support center; an extension of the TSC and local EOF
  - Dose Assessment / HPN Communications
  - Engineering
  - Media Relations via JIS

## Description of Changes

- **ERO Response Time**
  - Consistency across the ERO and Fleet
  - Remote Support
  - Existing Processes and Capabilities
  - Technology

## Description of Changes

- **Emergency Response Organization deviations from NUREG-0654 Revision 2**
  - Radiation Protection
    - On-shift – One ANSI RP Tech and One RP Qualified
    - Response Organization (OSC) – Two ANSI RP Tech and Two RP Qualified
  - Dose Projection – One individual (TSC) and One individual (NECC)
  - Field Monitoring Teams – Two FMTs

## Description of Changes

- **Emergency Response Organization deviations from NUREG-0654 Revision 2, (cont.)**
  - Operations Support Center
    - Lead OSC Supervisor
    - FIN Supervisor
    - EM Tech
    - MM Tech
    - I&C Tech
  - JIS concept with JIC and NECC responders
  - IT support utilizes current IT processes and practices external to the emergency plan

EM – Electrical Maintenance  
IT – Information Technology  
MM – Mechanical Maintenance

FIN – Fix-it-Now  
JIC – Joint Information Center  
NECC – NextEra Energy Command Center

I&C – Instrumentation and Control  
JIS – Joint Information System  
OSC – Operations Support Center





## Description of Changes

- **Emergency Plan deviations from NUREG-0654 Revision 2**
  - Risk Significant Planning Standards / Non-delegable Emergency Director responsibilities remain in TSC
  - Refer to Alert Notification System Design Report
  - Onsite Protection Actions (Accountability / Evacuation)
  - Medical Drill frequency with Hospital based upon 42 CFR 482.15 regulations
  - Call-in drill 8-year cycle

## Submittal Scope

- **One Fleet submittal covering all sites**
  - NextEra Energy Fleet Emergency Plan with Individual Site Annexes
- **Differences from NUREG-0654 Revision 2**
  - Differences between the proposed emergency plan, the current site emergency plans, and NUREG-0654/FEMA-REP-1 Revision 2, will be justified to show continued adequate emergency preparedness
  - Functional analysis performed to support staffing changes
- **ORO concurrence letters**

## Submittal Scope

- **Additional Submittal Discussion Topics**

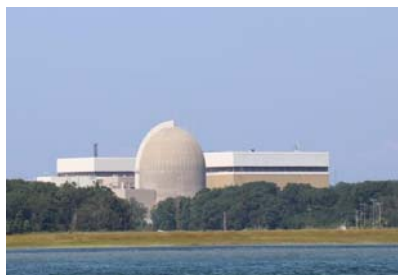
- Turkey Point 6 & 7
- NRC Onsite and TSC/EOF/JIC emergency response
- Background information provided to the NRC



## Schedule

- **Submittal of License Amendment to the NRC is currently planned for the 3<sup>rd</sup> Quarter of 2022**
- **NextEra will be requesting a 12-month NRC review and 12-month implementation period**

## Questions

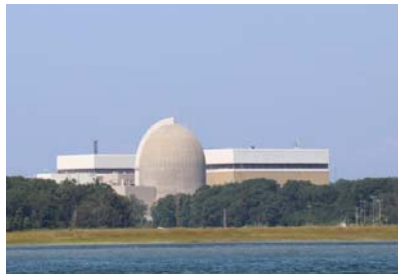


Enclosure 4



## **Pre-Submittal Meeting to Discuss Upcoming NextEra Energy Plans for Submission of Common Fleet Emergency Plan**

**May 18, 2022**



## **FP&L / NextEra Energy Participants**

**William Maher, Sr. Director – Nuclear Licensing Projects, NextEra**

**Steve Catron, Director – Licensing and Regulatory Compliance, NextEra**

**Noah Narut, Fleet Emergency Preparedness Manager, NextEra**

**Jerry Phillabaum – Fleet Licensing, NextEra**

**Denny Smith, Project Manager – NextEra Energy Point Beach**

**David Currier, Project Manager – NextEra Energy Seabrook**

**Peter Polfleit, Project Manager – FP&L St. Lucie Nuclear Plant**

**Cynthia Cashwell, Regulatory Affairs Manager – FP&L Turkey Point Nuclear Plant**



## Purpose

### **Purpose of upgrading all our sites to NUREG-0654 (Revision 2):**

- Operate in the newest, most up-to-date regulatory environment
- Re-baselining of the Emergency Plans
- One Fleet
- Technology Enhancements
- ORO Radiation Emergency Preparedness Plans and NextEra Energy Emergency Plan will be at the same revision of NUREG-0654

***The submission of the Common Fleet Emergency Plan is currently being developed and is subject to change***

## Regulatory Requirements and Guidance

- **10 CFR 50.47, “Emergency Plans”**
- **10 CFR 50 Appendix E, “Emergency Planning and Preparedness for Production and Utilization Facilities”**
- **10 CFR 50.54(q), “Conditions of Licenses - Emergency Plans”**
- **NUREG-0654/FEMA-REP-1 Revision 2, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants”**

## Precedents

- **Duke Energy Corporation**
- **South Texas Project (STP) Nuclear Operating Company**
- **La Crosse Boiling Water Reactor (LACBWR) / Dairyland**

## Technological and Program Advancements

- **Plant systems and procedures, including:**
  - Severe Accident Management Guidelines (SAMG)
  - FLEX Support Guidelines (FSG)
  - Extensive Damage Mitigation Guidelines (EDMG)
  - Emergency Operating Procedures (EOP) / Abnormal Operating Procedures (AOP)
  - Plant computer, control and instrumentation systems
- **Emergency preparedness (EP) programs, processes, and equipment, including:**
  - Communication and notification systems (Plant and public)
  - Dose Assessment programs and processes
  - Emergency Action Levels (EALs)
  - NRC Emergency Response Data System (ERDS) system

## Technological and Program Advancements (cont.)

- **Operator, ERO, and General Employee Training (GET) training**
- **Radiological monitoring systems**
- **Computer and internet usage**
- **Work Control – Risk Assessment**
- **NRC Regulations and guidance documents**

## Description of Changes / Deviations from NUREG-0654 Rev 2

- **NextEra Energy Command Center (NECC) / Remote Response**
  - Remote support center; an extension of the TSC and EOF
  - Engineering (90 min)
  - Media Relations via JIS
- **Risk Significant Planning Standards / Non-delegable Emergency Director responsibilities transfer and remain in TSC**
- **Medical Drill frequency with Hospital based upon 42 CFR 482.15 regulations**
  - LACBWR / Dairyland precedent
- **Call-in Drill 8-year cycle**
  - STP precedent

## Description of Changes / Deviations from NUREG-0654 Rev 2 (cont.)

- **Radiation Protection Technician response**
  - Radiation Protection Qualified Individual (RPQI)
    - Duke precedent
  - Responding personnel (4 vs 6)
  - Response time (90 minutes vs 3 @ 60 minutes and 3 @ 90 minutes)
- **On-site Field Monitoring response (0 vs. 2)**
  - Two Field Monitoring Teams responding at 90 minutes
- **Operations Support Center (OSC) Radiation Protection Supervisor response (0 vs. 1)**

## Description of Changes / Deviations from NUREG-0654 Rev 2 (cont.)

- **Communicators**

- Offsite Response Organization Communicator (TSC)
- NRC / Emergency Notification System Communicator (TSC)
- Health Physics Network Communicator function performed by EOF Dose Assessor and EOF Field Monitoring Team Lead (EOF)
  - Duke precedent
- Response Time (90 vs 60)

- **Operations Support Center at 90 Minutes**

- Lead OSC Supervisor
- FIN Supervisor
- EM Tech
- MM Tech
- I&C Tech
  - Duke precedent (responding staff)



## Description of Changes / Deviations from NUREG-0654 Rev 2 (cont.)

- **ERO Response time (90 minutes vs 60 minutes)**
  - Site Emergency Director (TSC)
  - Classification Advisor (TSC)
  - Site Dose Assessor (EOF)
  
- **Information Technology (IT) support utilizes**
  - HelpDesk
  - IT processes and practices
    - Duke precedent
  
- **Minimum Staffing Drill**
  - Duke and STP precedent

## Submittal Scope

- **Additional Submittal Discussion Topics**
  - Submittal Freeze Date
  - Background information available
- **Schedule**
  - Submittal of License Amendment to the NRC is planned for the 3<sup>rd</sup> Quarter of 2022
  - Will be requesting a 12-month NRC review and 12-month implementation period

## Questions



SUBJECT: SUMMARY OF FEBRUARY 16, AND MAY 18, 2022, MEETINGS WITH NEXTERA ENERGY/FLORIDA POWER & LIGHT COMPANY REGARDING PLANNED SUBMITTAL OF LICENSE AMENDMENT REQUEST FOR A COMMON FLEET EMERGENCY PLAN (EPID L-2022-LRM-0015) DATED SEPTEMBER 14, 2022

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MNorris, NSIR  
BMusico, NSIR  
KMott, NSIR  
RHoffman, NSIR  
KNolan, OEDO

**ADAMS Accession Nos.**

**Meeting Notices: ML22032A172 and ML22124A218**

**Meeting Summary ML22144A002**

**NRC-001**

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM
NAME	JPoole	KZelevnock	HGonzalez	JPoole
DATE	05/23/2022	06/14/2022	09/14/2022	09/14/2022

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