



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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August 7, 2022

MEMORANDUM TO: File

FROM: Michael L. Marshall, Jr, Senior Project Manager /RA/
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: DOCUMENTATION OF APPROVAL FOR LONGER REVIEW
PERIOD FOR TURKEY POINT DIGITAL INSTRUMENTATION
AND CONTROL LICENSE AMENDMENT REQUESTS
ACCEPTANCE REVIEW (EPID NO. L-2022-LRM-0105)

By letter dated July 30, 2022, Florida Power & Light (the licensee) submitted license amendment requests for Turkey Point Nuclear Plant, Units 3 and 4 (Turkey Point). The proposed amendment requests would change both the design and technical specifications to permit the use of digital instrumentation and controls (I&C) for the reactor protection system, engineered safety features actuation system, and nuclear instrumentation system at Turkey Point. In addition, the proposed amendments would:

- allow use of safety related video display units
- allow use of a non-safety related diverse actuation system
- allow changes to the control room
- allow the automation of channel checks, channel operational tests, and actuation logic tests
- change instrumentation allowable values for affected functions
- change the definitions of channel check and channel operational test to account for the automation
- change the surveillance frequencies of affected channel checks, channel operational tests, and actuation logic tests

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The purpose of this memorandum is to document approval of a longer acceptance review period for the Turkey Point digital I&C license amendment requests. The basis for the request for a longer acceptance review period included:

- the changes in the license amendment are complex (including first-of-a-kind aspects)
- the license amendment is the first large analog to digital upgrade submitted under the alternate review process described in Digital I&C Interim Staff Guidance 06, Revision 2, "*Licensing Process*"
- a public meeting with the licensee will be necessary prior to completing the acceptance review to ensure correct assessment of the "completeness" of information included in the requests
- additional communications with internal stakeholders will be needed prior to providing acceptance decision and opportunity to supplement letter to licensee
- the license amendment request is voluminous (i.e., 1,668 pages)

The normal acceptance review period for a requested licensing action (including, license amendment request) is 25 working days or 53 working days with an opportunity to supplement the requested licensing action. According to Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, Revision 3, "*Acceptance Review Procedures for Licensing Basis Changes*," both the project and technical division management need to approve longer acceptance review periods. On August 24, 2022, Gregory Suber, the Deputy Director of the Division of Operating Reactor Licensing, verbally approved a review period of 60 calendar days or 73 calendar days with an opportunity to supplement for the Turkey Point digital I&C license amendment requests. Prior to the submittal of the request during preplanning discussions for the review of the amendment request and discussions concerning critical digital I&C milestones, Eric Benner, the Director of the Division of Engineering and External Hazards, approved a review period of 60 calendar days.

Docket Nos. 50-250 and 50-251

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AMENDMENT REQUESTS ACCEPTANCE REVIEW (EPID NO.
L-2022-LRM-0105) DATED AUGUST 7, 2022

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