



L-2022-148

Mr. Thomas Hipschman, Chief
Reactor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on NRC Inspection Procedure (IP) 71111.21N.03, "Commercial Grade Dedication"

Florida Power & Light Company on behalf of itself and of its affiliates, NextEra Energy Seabrook, LLC, and NextEra Energy Point Beach, LLC (collectively, "NextEra") appreciates the opportunity to comment on NRC Inspection Procedure (IP) 71111, Attachment 21N.03.

NextEra endorses the comments provided by the Electric Power Research Institute (EPRI) (ML22234A204, ML22234A207 and ML22234A208) and the Nuclear Utility Group on Equipment Qualification (NUGEQ) (ML22249A229), on behalf of the industry related to this NRC IP 71111.21N.03, "Commercial Grade Dedication."

NextEra has similar concerns as summarized below:

- The scope as written is well beyond the focused subject of CGD
- References identified are old and IP does not consider documents that were published as part of the efforts to clarify CGD requirements and methodology (e.g., RG 1.164 and EPRI 3002002982)
- Focus on Design Control (10 CFR 50 Appendix B Criterion III) is outside of CGD process – CGD is an acceptance activity providing reasonable assurance and the suitability of design is already established prior to pursuit of CGD
- With a Corporate/Fleet Centralized CGD Program, separate inspection for each Region (I – SEA, II – PSL/PTN, and III – PB) will result in redundant inspection burden for the Integrated Supply Chain (ISC) resources required for each inspection

We look forward to continued engagement on this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Diane Strand".

Dianne Strand
General Manager, Regulatory Affairs
Florida Power & Light Company