



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

October 13, 2022

Mr. Bob Coffey
Executive Vice President, Nuclear Division
and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop: EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 –
ACCEPTANCE OF REQUESTED LICENSING ACTION RE: LICENSE
AMENDMENT REQUESTS TO REPLACE INSTRUMENTATION WITH DIGITAL
SYSTEMS (EPID L-2022-LLA-0105)

Dear Mr. Coffey:

By letter dated July 30, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22214A076), as supplemented by letter dated October 5, 2022 (ADAMS Accession No. ML22278A075), Florida Power & Light (FPL, the licensee) submitted license amendment requests for the Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed license amendment requests would permit the use of digital instrumentation and controls 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; and change the surveillance frequencies of affected channel checks, channel operational tests, and actuation logic tests.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of these amendment requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does not provide technical information in sufficient detail in certain limited areas to enable the NRC staff to complete its detailed review and make an independent assessment regarding the acceptability of the proposed amendment. However, despite the lack of sufficient detail in the application, the NRC staff will accept the application for docketing, because FPL has provided a sufficiently detailed description of the missing information and provided a schedule for providing the missing information to the NRC.

The identified information insufficiencies were described to your staff during a public meeting on September 13, 2022 (ADAMS Accession No. ML22276A230) and discussed in a letter dated September 15, 2022 (ADAMS Accession No. ML22255A050). In the letter, the NRC staff requested that FPL provide a detailed description of the information currently missing from the application and provide the dates that the missing information will be submitted by the licensee on its docket. The table below list the documents containing the missing information and the schedule that FPL plans to submit the documents to NRC as described in the licensee's letter dated October 5, 2022. The NRC staff cannot complete the review of the Turkey Point license amendment requests without receiving the information described in the licensee's letter dated October 5, 2022.

Supplemental Information Necessary to Complete Review and Date when Licensee will Submit Information	
Document or Document Title	Date of Submittal
Operating Experience Results Summary Report	01/16/2023
Functions Requirements / Function Allocation / Task Analysis Results Summary Report	01/16/2023
Treatment of Important Human Actions Results Summary Report	01/16/2023
System Failure Modes and Effects Analysis	01/16/2023
Human System Interface Design Results Summary Report	06/05/2023
Environmental Qualification Qualification Summary Report for Nuclear Instrumentation	06/15/2023
Environmental Qualification Qualification Summary Report for Reactor Protection System / Engineered Safety Features Actuation System	09/15/2023
Preliminary Validation 2 Results Summary Report	10/31/2023

Based on the information provided in your license amendment requests, including the schedule for when supplemental information will be provided, the NRC staff has estimated that these licensing requests will take approximately 6,500 hours to complete. The NRC staff expects to complete this review by June 30, 2024. The estimated completion date accounts for briefings to the Advisory Committee on Reactors Safeguards on the NRC staff review of the amendment requests. If there are emergent complexities or challenges in the NRC staff's review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with new estimates, will be communicated during the routine interactions with the assigned NRC project manager and documented in subsequent correspondence to FPL.

The estimates for level of effort and completion schedule are based on the NRC staff's initial review of the application and the licensee's schedule for providing the information missing from the initial application.

These estimates are subject to change if there are delays in submitting the information described in FPL's letter dated October 5, 2022, or significant changes in the proposed digital system described in the initial application. Additionally, the estimates could change due to other factors including requests for additional information (especially, second round requests for additional information), unanticipated addition of scope to the review, and additional reviews by NRC advisory committees or hearing-related activities.

If you have any questions, please contact the NRC Project Managers for these license amendment requests, Bhagwat "BP" Jain at Bhagwat.Jain@nrc.gov or (301) 415-6303, and Michael Marshall at Michael.Marshall@nrc.gov or (301) 415-2871.

Sincerely,

/RA/

Michael L. Marshall, Jr., Senior Project Manager
Plant Licensing Branch 1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

cc: Listserv

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ADAMS Accession No. ML22280A108

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NAME	MMarshall	RButler	DWrona	MMarshall
DATE	10/11/2022	10/11/2022	10/13/2022	10/13/2022

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