



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

November 22, 2022

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

SUBJECT: 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 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: AMENDMENT REQUEST FOR COMMON EMERGENCY PLAN (EPID L-2022-LLA-0146)

Dear Mr. Coffey:

By letter dated October 4, 2022, Florida Power & Light Company, NextEra Energy Point Beach, LLC, and NextEra Energy Seabrook, LLC (collectively, the licensee) submitted a license amendment request for 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 proposed amendment would change each site's emergency plan by creating a new fleet common emergency plan with site-specific annexes. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. 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 the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements for the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure by December 9, 2022. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Michael Davis of your staff on November 21, 2022.

If you have any questions, please contact me at (301) 415-2048, or via email at [Justin.Poole@nrc.gov](mailto:Justin.Poole@nrc.gov).

Sincerely,

*/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

Enclosure:  
Supplemental Information Needed

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED

AMENDMENT REQUEST REGARDING COMMON EMERGENCY PLAN

FLORIDA POWER & LIGHT COMPANY

NEXTERA ENERGY POINT BEACH, LLC

NEXTERA ENERGY SEABROOK, LLC

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

SEABROOK STATION, UNIT NO. 1

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

DOCKET NOS. 50-266, 50-301, 50-443, 50-335, 50-389, 50-250, and 50-251

By letter dated October 4, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22278A031), Florida Power & Light Company, NextEra Energy Point Beach, LLC, and NextEra Energy Seabrook, LLC (collectively, the licensee) submitted a license amendment request for 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 proposed amendment would change each site's emergency plan by creating a new fleet common emergency plan with site-specific annexes.

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) or construction permit 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. Contrary to 10 CFR 50.90, the amendment request does not fully describe the changes requested.

Specifically, Section 3.7, "Current to Proposed E-Plan Comparison Analysis," of the application states for each respective site's analysis:

This comparison analysis identifies the differences between the current emergency plan (as of 01/12/22) and the proposed NextEra Common Emergency Plan (CEP) and PBN [site-specific] Emergency Plan Site Annex.

Differences between the content of current emergency plan and the proposed emergency plan were evaluated to determine whether any potential reductions in effectiveness were introduced by changes made.

Enclosure

The results of the comparison between the current emergency plan and the proposed emergency plan revealed the following changes that could be considered reductions in effectiveness.

The application references the guidance from Regulatory Guide (RG) 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors." This RG states, in part, that the application must include all emergency plan pages affected by the change and a forwarding letter identifying the change(s), the reason for the change(s), and the licensee's basis for concluding that its emergency plan, as modified, continues to meet the planning standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR Part 50. However, the application does not provide the differences between the content of current emergency plan and the proposed emergency plan as well as an evaluation of these changes.

Additionally, Section 3.3, "ERO [Emergency Response Organization] Augmentation Analysis," of the application states for each respective site's analysis:

The NEI [Nuclear Energy Institute] 10-05 based On-shift Staffing Analysis performed using the proposed emergency plan on-shift ERO identified no task overlap or overburden of the Command and Control function out to 120 minutes.

**Or**

The NEI 12-01 based staffing analysis performed for using the proposed emergency plan on-shift ERO identified no task overlap or overburden of the Radiation Protection function out to 6 hours for design basis and other ER [Emergency Response] related events.

The NEI 10-05 based On-shift Staffing Analysis performed using the proposed emergency plan on-shift ERO identified no task overlap or overburden of the Radiation Protection function out to 120 minutes for design basis and other ER related events.

Regulatory Issue Summary (RIS) 2016-10, "License Amendment Request for Changes to Emergency Response Organization Staffing and Augmentation," states, NEI 10-05, or a similar analysis, does not consider the capabilities offered by the augmenting ERO staff to relieve and support on-shift staffing for the purposes of providing justification for extension of ERO response times.

The application did not contain any analysis, nor would an analysis based solely on NEI 10-05 be used to justify extending ERO augmentation times.

**The following information is requested:**

The application should identify and include all the changes from the current emergency plans to the common plan and site-specific annexes.

The application should contain an analysis that can be used by the NRC staff to assess the impact of the proposed changes on the relief and support functions offered by the augmenting ERO staff to effectively implement the emergency plan.

This information should be sufficiently detailed and provides justification for extension of ERO response times and proposed changes to ERO on-shift and augmentation staffing.

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DATE	11/22/2022	11/22/2022	

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