



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

November 18, 2022

William D. Maher
Licensing Director - Nuclear Licensing Projects
Florida Power & Light Company
15430 Endeavor Drive
Jupiter, FL 33478

SUBJECT: TURKEY POINT NUCLEAR GENERATING STATION, UNITS 3 AND 4 -
LICENSE RENEWAL REGULATORY AUDIT REGARDING THE
ENVIRONMENTAL REVIEW OF THE SUBSEQUENT LICENSE RENEWAL
APPLICATION SUPPLEMENT (EPID NO. L-2021-SLE-0002)

Dear William D. Maher:

By letter dated June 9, 2022 (Agencywide Documents Access and Management System (ADAMS) (ML22160A301), Florida Power & Light Company submitted an Environmental Report (ER), Supplement 2 (the ER supplement), related to its 2018 application (ML18037A812) for subsequent license renewal of Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Station, Unit Nos. 3 and 4 (Turkey Point), respectively, to the U.S. Nuclear Regulatory Commission (NRC) pursuant to section 103 of the Atomic Energy Act of 1954, as amended.

The NRC staff has initiated the environmental review for the ER supplement. An environmental audit will be conducted remotely by NRC staff during the week of December 12, 2022. The environmental audit activities will be conducted in accordance with the enclosed Environmental Audit Plan (Enclosure 1).

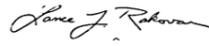
To the extent possible, the NRC staff requests the information identified in the Environmental Audit Needs List (Enclosure 2) be made available on the Turkey Point online reference portal prior to the audit. A draft schedule of tours and meetings is provided in Enclosure 3.

W. Maher

- 2 -

If you have any questions, please contact me via e-mail at Lance.Rakovan@nrc.gov.

Sincerely,



Signed by Rakovan, Lance
on 11/18/22

Lance J. Rakovan
Senior Environmental Project Manager
Environmental Review License Renewal Branch
Division of Rulemaking, Environmental,
and Financial Support
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 50-250 and 251

Enclosures:
As stated

cc w/encls: Listserv

SUBJECT: TURKEY POINT NUCLEAR GENERATING STATION, UNITS 3 AND 4 -
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DATED: NOVEMBER 18, 2022

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MMahoney, NRR/DORL
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DRoth, OGC
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LWilkin, HQ/OCA
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DOrr, RII/SRI
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ADAMS Accession No.: ML22321A323

OFFICE	NE/PM:ELRB:REFS	LA:REFS/ERMB	BC:ELRB:REFS	NE/PM:ELRB:REFS
NAME	LRakovan	AWalker-Smith	TSmith	LRakovan
DATE	11/17/2022	11/17/2022	11/17/2022	11/18/2022

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Audit Plan

Subsequent License Renewal Environmental Review Turkey Point Nuclear Generating Station, Units 3 and 4

December 12-17, 2022

**Division of Materials and License Renewal
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission**

SUBSEQUENT LICENSE RENEWAL SITE-SPECIFIC ENVIRONMENTAL AUDIT PLAN TURKEY POINT NUCLEAR GENERATING STATION, UNITS 3 AND 4

1. Background

By letter dated June 9, 2022 (Agencywide Documents Access and Management System [ADAMS] ML22160A301), Florida Power & Light Company (FPL) submitted an Environmental Report (ER), Supplement 2 (the ER supplement), related to its 2018 application (ML18037A812) for subsequent license renewal of Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Station, Unit Nos. 3 and 4 (Turkey Point), respectively, to the U.S. Nuclear Regulatory Commission (NRC) pursuant to section 103 of the Atomic Energy Act of 1954, as amended. A *Federal Register* Notice (FRN) (87 FR 44430) dated July 26, 2022, noted the receipt and availability of the ER supplement.

The NRC staff is conducting an environmental audit of the Turkey Point site to improve understanding, to verify information, and to identify information for docketing to support the preparation of an environmental impact statement. Specifically, the NRC staff will be identifying pertinent environmental data, reviewing the facility, and seeking clarifications regarding information provided in the ER supplement.

2. Environmental Audit Bases

License renewal requirements for environmental reports are specified in title 10 of the *Code of Federal Regulations* (10 CFR) part 51, "Postconstruction environmental reports." As specified by 10 CFR 51.53(c): *Operating license renewal stage*, "(1) Each applicant for renewal of a license to operate a nuclear power plant under part 54 of this chapter shall submit with its application a separate document entitled "Applicant's Environmental Report—Operating License Renewal Stage." Review guidance for the staff is provided in NUREG-1555, Supplement 1, Revision 1, "Standard Review Plans for Environmental Reviews for Nuclear Power Plants: Supplement 1 – Operating License Renewal."

On February 24, 2022, the NRC Commission issued three orders that addressed subsequent license renewal (SLR) proceedings for five operating nuclear power plants. Two of these orders, Commission Legal Issuance (CLI)-22-02 (ML22055A496) and CLI-22-03 (ML22055A533), addressed Turkey Point. In the orders, the Commission concluded that the NRC's NUREG-1437, Revision 1, *Generic Environmental Impact Statement for License Renewal of Nuclear Plants—Final Report* (the LR GEIS), which the NRC staff relies on in part to meet its obligations under 10 CFR part 51 and the National Environmental Policy Act (NEPA), did not consider SLR. Therefore, the Commission determined that the NEPA reviews for the affected nuclear power plants, including Turkey Point, were inadequate because those reviews relied upon the LR GEIS.

In CLI-22-03, the Commission allowed that SLR applicants may submit a revised environmental report providing information on environmental impacts during the SLR period. In such a submittal, SLR applicants must evaluate the impacts of those environmental issues dispositioned in Table B-1 in Appendix B to Subpart A of 10 CFR part 51 and the LR GEIS as generic (Category 1) issues. The NRC staff would then address the impacts of these issues during the SLR period in site-specific environmental impact statements.

On June 6, 2022, FPL submitted a site-specific environmental report of the impacts of continued operations of Turkey Point during the SLR period (ML22160A301). That report, which supplemented the environmental report included in FPL's 2018 SLR application, addressed each environmental issue previously dispositioned as a Category 1 issue in the environmental report on a site-specific basis.

In accordance with the CLI-22-03, the NRC staff is preparing a site-specific supplement to NUREG-1437, Supplement 5, Second Renewal *Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Subsequent License Renewal for Turkey Point Nuclear Generating Unit Nos. 3 and 4* (the FSEIS). During the scoping process specified in 10 CFR part 51, the NRC staff is required to define the proposed action, identify significant issues which must be studied in depth, and to identify those issues that can be eliminated from further study.

3. Environmental Audit Scope

The scope of this environmental audit is to obtain information needed to perform site-specific analyses of those environmental issue previously dispositioned as Category 1 (generic) issues in the FSEIS. The staff will also seek information on whether significant new information has arisen following the issuance of the FSEIS in October 2019 that would change the staff's conclusions concerning site-specific (Category 2) environmental issues made in that document. Audit team members, after reviewing documents and other requested information identified in Enclosure 2 and made available on the Turkey Point online reference portal, will discuss any questions and additional information needs with the applicant's subject matter experts.

4. Information and Other Material Necessary for the Environmental Audit

As identified on the environmental audit needs list (Enclosure 2).

5. Environmental Audit Team Members and Resource Assignments

The environmental audit team members and their assignments are shown in the table below.

Discipline	Team Members
Environmental Review Supervisor	Ted Smith
Environmental Project Manager	Lance Rakovan
Air Quality	Bob Hoffman
Aquatic Resources	Briana Arlene
Cumulative Impacts	Briana Arlene w/ Jeff Rikhoff
Environmental Justice	Nancy Martinez
Federally Protected Ecological Resources	Briana Arlene
Geologic Environment	Lifeng Guo
Greenhouse Gas Emissions and Climate Change	Bob Hoffman
Groundwater	Lifeng Guo
Historic and Cultural Resources	Nancy Martinez w/ Lance Rakovan
Human Health	Beth Alferink

Discipline	Team Members
Land Use and Visual Resources	Caroline Hsu
Meteorology and Climatology	Bob Hoffman
Noise	Nancy Martinez
Postulated Accidents	Jerry Dozier
Replacement Power Alternatives	Bob Hoffman
Socioeconomics	Nancy Martinez
Surface Water Resources	Lifeng Guo
Spent Nuclear Fuel	Beth Alferink
Termination of Operations and Decommissioning	Beth Alferink
Terrestrial Resources	Briana Arlene
Uranium Fuel Cycle	Beth Alferink
Waste Management	Beth Alferink w/ Don Palmrose

6. Logistics

The environmental audit will be conducted remotely from December 12-17, 2022. An entrance meeting will be held with plant management at the beginning of the audit and an exit meeting will be held at the end of this audit.

7. Special Requests

Turkey Point staff and contractors who are subject matter experts in the disciplines identified on the environmental audit needs list should be familiar with the requested information and documents and be available for interviews and tours.

8. Deliverables

An audit summary report will be issued by the NRC staff within 90 days from the end of the environmental audit.

Turkey Point Site-Specific Information Needs

The NRC staff's site-specific information needs are described below in three categories: tours, meetings, and information needs. Information needs are identified as either resource-specific questions or document requests. Please arrange for the tours and meetings to occur during the virtual environmental audit. Additionally, we ask that you provide responses to the information needs on the electronic portal and make subject matter experts available to discuss these items with the NRC staff.

Tours

Please arrange for, and provide subject matter experts to lead, the following tours during the audit:

Title or Number	Features Observed	Essential Participants
1. General site tour	<ul style="list-style-type: none"> a. Exterior grounds b. Interim storage of spent nuclear fuel (ISFSI) c. Plant views from publicly accessible areas d. Location of the Clean Water Recovery Center and land used for construction of the center 	All
2. Groundwater tour	<ul style="list-style-type: none"> a. Plant structures, systems, and components (SSC) that are identified as potential sources for groundwater contamination, and their locations. b. Locations/areas with groundwater monitoring wells, extraction wells, and injection wells. 	Lifeng Guo
3. Plant intake and discharge tour	<ul style="list-style-type: none"> a. Cooling canal system, intake structure, including intake velocity caps, intake pipes, intake canal, marine organism intercept canals barrier nets, and intake wells, and intercept canals b. Discharge structure, including discharge canal, discharge pipes, and area of thermal effluent dispersion c. Accessible permitted outfall locations 	Lifeng Guo
4. Radwaste tour	Liquid radwaste system - discharge locations	Beth Alferink Lifeng Guo

Title or Number	Features Observed	Essential Participants
5. Visual Resources	<p>a. Photos of Turkey Point from publicly accessible areas where plant structures or operations are visible. Specifically, please provide the following:</p> <ol style="list-style-type: none"> I. From public roads II. From the viewpoint of recreational water users III. From county, state, or Federal parks, recreation areas, preserves, beaches etc. IV. From residential areas, from which Turkey Point structures are visible V. From any other publicly accessible area where plant structures or operations are visible <p>b. A few photos of the old and new lights, specifically demonstrating the differences in lighting as a result of FPL's lighting project</p>	Caroline Hsu

Meetings

Please schedule breakout meetings with the appropriate subject matter expert(s) and/or contractor(s) concerning the following topics. Those in attendance should be prepared to discuss the corresponding questions as described in the “Information Needs and Document Requests” section below. The staff intends to use these breakout meetings, as needed, to resolve or clarify any outstanding data needs or questions arising from the environmental audit.

- Air quality and noise
- Aquatic resources
- Land use and visual resources
- Replacement power alternatives
- Socioeconomics
- Overview of Turkey Point’s groundwater protection program and affected groundwater resources. Please be prepared to discuss potential contaminant sources associated the plant SSC as that may be relevant to impact to groundwater at the site.
- Overview of the operation of cooling canal system (CCS), including receptor canal, effluent discharges, and water quality monitoring (can also be combined with aquatic resources).
- Overview of the various requirements pertaining to the CCS “freshening,” including Florida Department of Environmental Protection (FDEP) Conditions of Certification, the FDEP Consent Order, the Miami-Dade County Consent Agreement, applicable judicial proceedings, the site’s national pollution discharge elimination system (NPDES) permit, and other applicable requirements. While this discussion should focus on developments since the October 2019 final supplemental environmental impact statement (FSEIS), please note that those NRC reviewers that were not part of the original environmental review team would benefit from understanding the timeline and the requirements of these items since their inception.

Information Needs and Document Requests

Information needs and document requests are identified below by resource area.

General (Lance Rakovan/All)

The following requests are generic to more than one environmental review area. Issues from Table 2.1-1 applicable to these questions are provided below along with the responsible NRC subject matter expert, as appropriate.

GEN-1 Please provide any relevant updates to Table B-2 of the NRC's *Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 5, Second Renewal, Regarding Subsequent License Renewal for Turkey Point Nuclear Generating Unit Nos. 3 and 4, Final Report* (FSEIS) ([ML19290H346](#)) that have transpired since the NRC's issuance of the FSEIS in October 2019. If any permits have expired since submitting the license renewal application to the NRC, please provide the status of those permits and/or renewals.

GEN-2 Have there been any documented unplanned releases of radioactive materials (unplanned/ inadvertent radioactive liquid or gaseous releases) since FPL's most recent environmental request for additional information (RAI) responses dated August 8, 2018 ([ML18247A509](#))? If so, please provide a written description of the releases and be prepared to discuss these releases in relation to the following environmental issues, which were previously dispositioned as generic (Category 1) issues in the FSEIS.

- Aquatic Resources – Exposure of aquatic organisms to radionuclides (Arlene)
- Groundwater – Radionuclides released to groundwater (including unplanned or inadvertent releases to soil and subsurface) (Guo)
- Human Health – Radiation exposures to the public (Alferink)
- Human Health – Radiation exposures to plant workers (Alferink)
- Surface Water Resources – Discharge of metals in cooling system effluent (including releases to the CCS) (Guo)
- Surface Water Resources – Discharge of biocides, sanitary wastes, and minor chemical spills (including releases to the CCS) (Guo)
- Terrestrial Resources – Exposure of terrestrial organisms to radionuclides (Arlene)
- Uranium Fuel Cycle – Offsite radiological impacts—individual impacts from other than the disposal of spent fuel and high-level waste (Alferink)
- Uranium Fuel Cycle – Offsite radiological impacts—collective impacts from other than the disposal of spent fuel and high-level waste (Alferink)
- Uranium Fuel Cycle – Transportation (Alferink)
- Waste Management – Low-level waste storage and disposal (Alferink)
- Waste Management – Mixed-waste storage and disposal (Alferink)
- Waste Management – Offsite radiological impacts of spent fuel and high-level waste disposal (Alferink)

GEN-3 Have there been any reportable inadvertent releases or spills of nonradioactive contaminants since FPL's most recent environmental RAI responses dated August 8, 2018. If so, please provide a written description of the releases or spills and be prepared to discuss these releases or spills in relation to the following environmental issues, which were previously dispositioned as generic (Category 1) issues in the FSEIS.

- Aquatic Resources – Effects of nonradiological contaminants on aquatic organisms (Arlene)
- Groundwater – Groundwater contamination and use (non-cooling system impacts) (Guo)
- Human Health – Human health impacts from chemicals (Alferink)
- Surface Water Resources – Discharge of metals in cooling system effluent (Guo)
- Surface Water Resources – Discharge of biocides, sanitary wastes, and minor chemical spills (Guo)
- Waste Management – Mixed-waste storage and disposal (Alferink)
- Waste Management – Nonradioactive waste storage and disposal (Alferink)
- Uranium Fuel Cycle – Nonradiological impacts of the uranium fuel cycle (Alferink)
- Uranium Fuel Cycle – Transportation (Alferink)

GEN-4 Is FPL aware of any significant new information that has arisen following the issuance of the FSEIS in October 2019 that could affect the conclusions made in that document concerning the following site-specific (Category 2) environmental issues.

- Aquatic Resources – Impingement and entrainment of aquatic organisms (plants with once-through cooling systems or cooling ponds) (Arlene)
- Aquatic Resources – Thermal impacts on aquatic organisms (plants with once-through cooling systems or cooling ponds) (Arlene)
- Cumulative Impacts (Rikhoff & Arlene)
- Environmental Justice – Minority and low-income populations (e.g., subsistence activities) (Martinez)
- Groundwater– Groundwater use conflicts (plants that withdraw more than 100 gallons per minute [gpm]) (Guo)
- Groundwater– Radionuclides (e.g., tritium and plan-related gamma isotopes or hard-to-detect radionuclides) released to groundwater
- Historic and Cultural Resources – Historic and cultural resources (e.g., new cultural resource surveys, new historic properties) (Martinez & Rakovan)
- Human Health – Microbiological hazards to the public (Alferink)
- Human Health – Chronic effects of electromagnetic fields (Alferink)
- Human Health – Electric shock hazards (Alferink)
- Postulated Accidents – Severe accidents (Dozier)
- Special Status Species and Habitats – Threatened, endangered, and protected species and essential fish habitat (Arlene)
- Terrestrial Resources – Effects terrestrial resources (non-cooling system impacts) (Arlene)

Topic-specific

The following requests are specific to a single environmental review area. If a topic is not provided below, the discussions held in response to the generic requests above are expected to fully cover that topic.

Air Quality and Noise (Bob Hoffman & Nancy Martinez)

Audit Needs

- AQN-1** Please provide updated (2017 – 2022) estimated air pollutant emissions from operation of permitted sources at Turkey Point, Units 3 and 4 (i.e., SO_x, NO_x, CO, PM₁₀, and VOCs).
- AQN-2** Please provide updated estimated greenhouse gas emissions (GHG) from operation at Turkey Point, Units 3 and 4. As part of the response, include a brief discussion of the sources of greenhouse gas emissions and if FPL anticipates additional GHG emission sources and emissions during the SLR term.
- AQN-3** In its discussion of Category 1 Issue No. 6 (Air Quality Effects of Transmission Lines), FPL's June 6, 2022, Environmental Report Supplement 2 includes the following incomplete statement: "Comparing the 2013 GEIS analysis of the incremental effects of a 20-year renew..." Please complete the statement or clarify its intent.
- AQN-4** Have field tests concerning ozone and nitrogen oxides emissions generated by FPL's 230 kV in-scope transmission lines been conducted? If so please, provide a copy of these tests.

Document Needs

None

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Aquatic Resources (Briana Arlene)

Audit Needs

- AQ-1** In its analysis of Category 1 Issue No. 33, FPL's June 6, 2022, Environmental Report Supplement 2 states that "[m]onitoring results outside of the CCS indicate that CCS water is not contributing nutrients that would promote eutrophication to the surrounding aquatic resources." Please describe how Turkey Point's cooling water discharge has affected eutrophication *within* the CCS and provide an analysis of the potential impacts of this issue during the SLR period.
- AQ-2** In its analysis of Category 1 Issue No. 34, FPL's June 6, 2022, Environmental Report Supplement 2 describes compliance with NPDES permit limitations as a means of limiting the effects of nonradiological contaminants on aquatic organisms. Has FPL reported any violations of NPDES permit limits for zinc, copper, or iron in wastewater discharges, including stormwater, within the past five years? If so, please provide

copies of such FPL reports and/or notices of violation issued by the permitting authority.

Document Needs

None

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Groundwater (Lifeng Guo)

Audit Needs

- GW-1** What is current status of the freshwater and estuarine wetlands west and south of Turkey Point and adjacent to Biscayne Bay and Card Sound with respect to the impacts of hypersaline water and nutrients by the Biscayne aquifer through a groundwater pathway? Please provide an updated discussion.
- GW-2** Please provide updates on any recent changes that FPL has made to the CCS, groundwater, and surface water monitoring programs in response to regulatory requirements and insights gained from earlier monitoring. Include a discussion of the rationale for these modifications.

Document Needs

Note: Staff may request to review the groundwater modeling files

- GW-3** In its analysis of Category 1 Issue No. 21, FPL's June 6, 2022, ER Supplement 2, FPL describes that it requested FDEP to modify the Turkey Point Site Certification (#PA03-45E) to allow an increase of withdrawal volumes and installation of additional freshening wells. The FDEP approved the request and issued a modified site certification on October 19, 2021, allowing an increase of the Upper Floridan Aquifer annual allocation to 10,950 million gallons (average daily rate of 30 million gallons) with a maximum monthly allocation of 1,033.6 million gallons. FPL installed two additional authorized production wells (F2 and F7) in the Upper Floridan Aquifer, which began operations in January and November 2021, respectively. Please provide an updated site map showing all recovery wells and production wells in the Biscayne Aquifer and Upper Floridan Aquifer, along with current and projected seawater and freshwater interface, or reports and documents with that information.
- GW-4** In its analysis of Category 1 Issue No. 22, FPL's June 6, 2022, ER Supplement 2 references a February 2022 Court Order that recommended that the FDEP grant FPL a renewed industrial wastewater (IWW) permit for CCS operation. Please provide a copy of that order.
- GW-5** In its analysis of Category 1 Issue No. 22, FPL's June 6, 2022, ER Supplement 2, FPL describes a hearing that occurred in January 2021 in connection with Turkey Point's proposed IWW/National Pollutant Discharge Elimination System Permit (No. FL001562-012-IW1N) (IWW permit) renewal. Please make available the water quality and remedial progress data and information presented as part of that hearing.

GW-6 Please provide more detailed, referenceable data, including monitoring data and electromagnetic mapping data (e.g., reports with that information) showing salinity decreases in the CCS and Biscayne Aquifer since the issuance of the FSEIS in October 2019.

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Land Use and Visual Resources (Caroline Hsu)

Audit Needs

- LU-1** According to Environmental Report (ER) Supplement 2, the Turkey Point site includes two zones: IU-3 (industrial districts—unlimited manufacturing) for the generating station area, and GU (interim district) for the remaining portions of the site. Since 2019, have any areas of the site zoned under GU been rezoned to IU-3? During the subsequent license renewal term, does FPL have knowledge of GU-zoned areas which may be rezoned to IU-3? If so, what are the reasons for the change in zoning?
- LU-2** The ER supplement states that in a review of completed and planned projects between 2019 and 2026 that might have impacts to onsite and offsite land uses, “several planned projects were identified.” However, only the largest project, the Clean Water Recovery Center, is described in the supplement. Please list and briefly describe the other completed or planned projects between 2019-2026 identified that might have impacts to onsite and offsite land uses.
- LU-3** Please list and briefly describe any planned projects from 2027 to the end of the subsequent license renewal term that FPL is aware of that may have impacts to onsite and offsite land use.
- LU-4** Please provide further description of the onsite land use impacts of the Clean Water Recovery Center. When did construction commence and when will construction be completed? How many acres of onsite land will be disturbed for construction and how many acres of onsite land will be permanently disturbed for operation? What was the land use category of this area prior to construction? What will the land use category of the area be after construction is completed? How will land disturbed for construction be restored?
- LU-5** Please provide a further description of the offsite land use impacts for the Clean Water Recovery Center, namely the 8-mile-long, 42-inch-wide pipeline connecting the Clean Water Recovery Center on the Turkey Point site to the South District Wastewater Treatment Plant in Miami, FL. The ER supplement states that 73 percent of the 8-mile pipeline will be in the existing FPL transmission line right-of-way. For pipeline construction that occurs in the transmission line right-of-way, is there a plan for restoring the land after the pipeline is placed? Where will the other 27 percent of the pipeline be located?
- VIS-1** The ER supplement describes a lighting project at Turkey Point that was completed in 2021 which, among other actions, replaced the warm yellow sodium light with bright white LED lights. When did work on this lighting project begin? Since the luminosity range and average luminosity of the new LED lights are lower than the

luminosity range and average luminosity for the older sodium lights, and there is now 0 percent uplighting, would FPL characterize the new lighting as creating less of a visual impact than the old lighting?

Document Needs

LU-6 Please provide a map of the Turkey Point site that shows the location/footprint of the Clean Water Recovery Center, as well as a map that shows the planned route/location of the 8-mile-long pipeline connecting the Clean Water Recovery Center with the South District Wastewater Treatment Plant.

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Replacement Power Alternatives (Bob Hoffman)

Audit Needs

ALT-1 Please confirm the continued validity of (or update, as appropriate) the technical bases presented in FPL's January 18, 2018, ER (and associated correspondence) used to support the identification of reasonable replacement power alternatives to renewing Turkey Point Nuclear Plant Units 3 and 4.

Document Needs

None

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Socioeconomics (Nancy Martinez)

Audit Needs

SOC-1 The ER Supplement identifies that in 2019 the Miami-Dade County over assessed the taxable value for Turkey Point Units 3 and 4, which in turn generated an overpayment of property taxes by FPL. The ER Supplement further discusses that the property tax payment was subsequently reconciled between FPL and Miami-Dade County in 2020. Please discuss the process that led to the reconciliation, if any, such as tax appeals, or settlements.

SOC-2 In 2015, the Nuclear Energy Institute conducted an analysis of the economic impact of FPL's nuclear power plants (Economic Impact of Florida Power & Light Company's Nuclear Power Plants, An Analysis by the Nuclear Energy Institute). The report identifies the following:

- The average FPL nuclear plant (both St. Lucie and Turkey Point) employee's compensation is \$97,500
- Turkey Point spent \$147 million in its local counties (Miami-Dade, Broward and Monroe)

Please provide updated average Turkey Point plant employee wage and the most recently available Turkey Point local spending data (for Miami-Dade County only).

- SOC-3** FPL identified in response to an RAI (ADAMS ML18247A509), that in addition to property tax payments, FPL pays sales tax to Miami-Dade County for purchases. In 2017, that amount totaled approximately \$224,000 in sale taxes to Miami-Dade County from Turkey Point operation expenses. Please provide annual Miami-Dade sales tax payment for the most recent year that is available.
- SOC-4** Please discuss how the current non-outage and outage workforce shifts for Turkey Point Units 3 and 4 are divided.
- SOC-5** If FPL has conducted traffic studies since the 2009 Turkey Point Power Plant Peak Construction Analysis (ADAMS ML16167A504), please provide a copy of the study or studies.

Document Needs

None

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Surface Water Resources (Lifeng Guo)

Audit Needs

- SW-1** If there have been any reported violations of the IWW/NPDES permit as a result of use and discharges of biocides and other chemical additives exceeding permit conditions in the CCS since the publication of the FSEIS, please provide a detailed discussion of the violation(s).
- SW-2** If there have been any reported violations of the IWW/NPDES permit associated with exceedances of metals, including zinc, copper, and iron levels in the CCS due to the of discharge of waste stream reaching the CCS since the publication of the FSEIS, please discuss the occurrence(s).

Document Needs

None

Turkey Point Nuclear Station Environmental Audit Schedule

Monday, December 12, 2022

START	END	ACTIVITY
9:00 am	9:30 am	Entrance meeting between NRC and Florida Power & Light Company (FPL)
9:30 am	4:00 pm	Virtual tours/virtual meetings between NRC and FPL subject matter experts (SMEs)

Tuesday, December 13, 2022

START	END	ACTIVITY
9:00 am	4:00 pm	Virtual tours/virtual meetings between NRC and FPL SMEs

Wednesday, December 14, 2022

START	END	ACTIVITY
9:00 am	4:00 pm	Virtual tours/virtual meetings between NRC and FPL SMEs

Thursday, December 15, 2022

START	END	ACTIVITY
9:00 am	4:00 pm	Virtual tours/virtual meetings between NRC and FPL SMEs

Friday, December 16, 2022

START	END	ACTIVITY
9:00 am	12:00 pm	Virtual tours/virtual meetings between NRC and FPL SMEs
2:00 pm	2:30 pm	Exit meeting between NRC and Duke Energy Carolinas