



L-2023-082  
10 CFR 54.17  
June 14, 2023

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
11545 Rockville Pike  
One White Flint North  
Rockville, MD 20852-2746

St. Lucie Nuclear Plant Units 1 and 2  
Dockets 50-335 and 50-389  
Renewed Facility Operating Licenses DPR-67 and NPF-16

SUBSEQUENT LICENSE RENEWAL APPLICATION REVISION 1 – SUPPLEMENT 5

Reference:

1. Florida Power & Light Company (FPL) letter L-2021-192, Subsequent License Renewal Application - Revision 1, October 12, 2021 (ADAMS Package Accession No. ML21285A106)
2. FPL letter L-2022-043, Subsequent License Renewal Application Revision 1 - Supplement 1, April 7, 2022 (ADAMS Accession No. ML22097A202)
3. FPL Letter L-2022-108 dated July 11, 2022 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 2 Response (ADAMS Accession No. ML22192A078)
4. FPL Letter L-2022-115 dated August 9, 2022 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 3 Response and Submittal of Superseded Response for One Set 2 RAI and One Supplement 1 Attachment (ADAMS Accession No. ML22221A134)
5. FPL Letter L-2022-154, Subsequent License Renewal Application Revision 1 – Supplement 4, September 22, 2022 – (ADAMS Accession No. ML22265A134)
6. FPL Letter L-2023-059 dated April 21, 2023 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 4 Supplemental Response (ADAMS Accession No. ML23111A129)

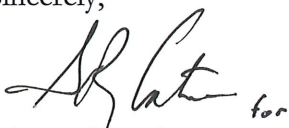
Florida Power & Light Company (FPL), owner and licensee for the St. Lucie Nuclear Plant (PSL) Units 1 and 2, has submitted a revised and supplemented subsequent license renewal application (SLRA) for the Facility Operating Licenses for PSL Units 1 and 2 (References 1-6). The two attachments to this letter provide a fifth supplement to the SLRA. Attachment 1 provides clarification of SLRA Unit 1 Commitments 13 and 24. Attachment 2 provides clarification of SLRA Unit 2 Commitments 1, 13, 20, 24, 25, and 36. Both attachments contain the final clean version of each commitment, incorporating all prior revisions from previous supplements and responses to RAIs.

Should you have any questions regarding this submission, please contact Mr. Michael Davis, Fleet Licensing Projects Manager, at 319-851-7032.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 14<sup>th</sup> day of June 2023.

Sincerely,

Handwritten signature of Dianne Strand in cursive, with the word "for" written in small letters at the end of the signature.

Dianne Strand  
General Manager Regulatory Affairs  
Florida Power & Light Company

Cc: Regional Administrator, USNRC, Region II  
Senior Resident Inspector, USNRC, St. Lucie Plant  
Chief, USNRC, Division of New and Renewed Licenses  
Senior Project Manager, USNRC, Division of New and Renewed Licenses  
Chief, Bureau of Radiation Control, Florida Department of Health

SLRA Supplement 5 Attachment 1  
Clarification of PSL Unit 1 SLRA Commitments

(5 pages follow)

### **Clarification of PSL Unit 1 Commitment No. 13**

**Affected SLRA Sections:** Appendix A1, Section 19.4, Table 19-3, Commitment No. 13

#### **Issue**

The response to Supplement 1, Attachment 18, page 30 of 38 (Ref. 1) made the appropriate changes to the Implementation Schedule for Commitment No. 13, but inadvertently deleted the comma after the words “No later than 6 months prior to the SPEO”. The response to RAI Set 2, Attachment 5, page 9 of 57 (Ref. 2) added the comma back to the Implementation Schedule for Commitment No. 13. The response to RAI Set 3, Attachment 7 (Ref. 3), superseded the previously submitted response to Supplement 1, Attachment 18 (Ref. 1). However, the response to RAI Set 3, Attachment 7 (Ref. 3) is consistent with the changes made to the Implementation Schedule for PSL Unit 1 Commitment No. 13 provided in RAI Set 2, Attachment 5 (Ref. 2).

#### **Resolution**

For clarification, the final version of SLRA Appendix A1, Section 19.4, Table 19-3, Commitment No. 13, with all the appropriate revisions, is provided on the following page.

SLRA Appendix A1, Section 19.4, Table 19-3, page A1-71, is clarified as follows:

**Table 19-3**  
**List of Unit 1 SLR Commitments and Implementation Schedule**

<b>No.</b>	<b>Aging Management Program or Activity (Section)</b>	<b>NUREG-2191 Section</b>	<b>Commitment</b>	<b>Implementation Schedule</b>
13	Steam Generators (19.2.2.10)	XI.M19	a) Continue the existing PSL Steam Generators AMP.	No later than 6 months prior to the SPEO, i.e.: PSL1: 09/01/2035

**Clarification of PSL Unit 1 Commitment No. 24**

**Affected SLRA Sections:** Appendix A1, Section 19.4, Table 19-3, Commitment No. 24

**Issue**

The response to Supplement 1, Attachment 7, page 7 of 33 (Ref. 1), made changes to the Implementation Schedule of Commitment No. 24. The response to RAI Set 4 Supplemental Response, Attachment 3, page 34 of 41 (Ref. 4), made changes to the commitment scope of Commitment No. 24, but, inadvertently omitted the Implementation Schedule changes previously made by Supplement 1, Attachment 7 (Ref. 1).

**Resolution**

For clarification, the final version of SLRA Appendix A1, Section 19.4, Table 19-3, Commitment No. 24, with all the appropriate revisions, is provided on the following page.

SLRA Appendix A1, Section 19.4, Table 19-3, page A1-89, is clarified as follows:

**Table 19-3**  
**List of Unit 1 SLR Commitments and Implementation Schedule**

<b>No.</b>	<b>Aging Management Program or Activity (Section)</b>	<b>NUREG-2191 Section</b>	<b>Commitment</b>	<b>Implementation Schedule</b>
24	Selective Leaching (19.2.2.21)	XI.M33	<p>Implement the new PSL Selective Leaching AMP, including the following additional action:</p> <p>a) To confirm that loss of material due to selective leaching is an aging effect unique to the external surfaces of the Unit 1 EDG copper alloy with greater than 15 percent zinc radiator tubes, PSL will perform a one-time inspection of a representative sample of Unit 1 and 2 copper alloy with greater than 15 percent zinc components exposed to an air-outdoor external and air-outdoor internal environments, as applicable, prior to the SPEO. This inspection will be performed in accordance with the Selective Leaching AMP and will be considered a separate inspection population.</p>	<p>Program inspections begin 10 years before the SPEO. Inspections that are to be completed prior to the SPEO are completed 6 months prior to the SPEO or no later than the last refueling outage prior to the SPEO.</p> <p>Program and SLR enhancements are implemented 6 months prior to the SPEO, i.e.:</p> <p>PSL1: 09/01/2035</p>

**References**

1. FPL Letter L-2022-043 dated April 7, 2022 – Subsequent License Renewal Application Revision 1 – Supplement 1 (ADAMS Accession No. ML22097A202)
2. FPL Letter L-2022-108 dated July 11, 2022 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 2 Response (ADAMS Accession No. ML22192A078)
3. FPL Letter L-2022-115 dated August 9, 2022 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 3 Response and Submittal of Superseded Response for One Set 2 RAI and One Supplement 1 Attachment (ADAMS Accession No. ML22221A134)
4. FPL Letter L-2023-059 dated April 21, 2023 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 4 Supplemental Response (ADAMS Accession No. ML23111A129)



SLRA Supplement 5 Attachment 2  
Clarification of PSL Unit 2 SLRA Commitments

(19 pages follow)

**Clarification of PSL Unit 2 Commitment No. 1**

**Affected SLRA Sections:** Appendix A2, Section 19.4, Table 19-3, Commitment No. 1

**Issue**

The response to Supplement 4, Attachment 1, page 2 of 5 (Ref. 1) added a new item a) to the commitment scope of Commitment No. 1. However, the new item a) was inadvertently not denoted by **bold red underline** (insertion) text.

**Resolution**

For clarification, the final version of SLRA Appendix A2, Section 19.4, Table 19-3, Commitment No. 1, with all the appropriate revisions, is provided on the following pages.

SLRA Appendix A2, Section 19.4, Table 19-3, page A2-65, is clarified as follows:

**Table 19-3**  
**List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
1	Fatigue Monitoring (19.2.1.1)	X.M1	<p>Continue the existing PSL Fatigue Monitoring AMP, including enhancement to:</p> <ul style="list-style-type: none"> <li>a) Update the AMP governing procedure to take action to revise the affected St. Lucie Unit 2 Class 1 piping fatigue analyses before 80-year plant design cycle limits are exceeded, and identify any new break locations (CUF &gt; 0.1) requiring evaluation for impact on essential SSCs, including evaluation for associated dynamic affects (jet impingement, reactive forces and pipe whip, compartment pressure and environmental conditions), as required.</li> <li>b) Update the plant procedure to monitor chemistry parameters that provide inputs to <math>F_{en}</math> factors used in <math>CUF_{en}</math> calculations.</li> <li>c) Update the plant procedure to identify and require monitoring of the 80-year projected plant transients that are utilized as inputs to <math>CUF_{en}</math> calculations. These transients include: <ul style="list-style-type: none"> <li>• The plant loading/unloading transient, the 10 percent step load increase/decrease transient, and the cold feedwater following hot standby transient.</li> <li>• The primary coolant pump starting/stopping transient.</li> <li>• The auxiliary spray at power 1, auxiliary spray at power 2, and main spray term in cooldown transients.</li> <li>• The pressurizer spray nozzle transient (also called the spray nozzle transient 17A/B/C).</li> </ul> </li> <li>d) Update the plant procedure to monitor and track the following transients during the SPEO: <ul style="list-style-type: none"> <li>• Loss of charging</li> <li>• Loss of letdown</li> <li>• Loss of regenerative heat exchanger (short-term)</li> </ul> </li> </ul>	<p>No later than 6 months prior to the SPEO, i.e.:</p> <p>PSL2: 10/06/2042</p>

**Table 19-3**  
**List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
			<ul style="list-style-type: none"> <li>• Loss of regenerative heat exchanger (long-term)</li> </ul> e) Update the plant procedure to identify the corrective action options to take if component specific fatigue limits are approached.	

### **Clarification of PSL Unit 2 Commitment No. 13**

**Affected SLRA Sections:** Appendix A2, Section 19.4, Table 19-3, Commitment No. 13

#### **Issues**

1. The response to Supplement 1, Attachment 18, page 32 of 38 (Ref. 2) inadvertently referred to PSL Unit 1 in the header of Table 19-3.
2. The response to Supplement 1, Attachment 18, page 32 of 38 (Ref. 2) made the appropriate changes to the Implementation Schedule for Commitment No. 13, but inadvertently deleted the comma after the words “No later than 6 months prior to the SPEO”. The response to RAI Set 2, Attachment 5, page 35 of 57 (Ref. 3) added the comma back to the Implementation Schedule for Commitment No. 13. The response to RAI Set 3, Attachment 7 (Ref. 4), superseded the previously submitted response to Supplement 1, Attachment 18 (Ref. 2). However, the response to RAI Set 3, Attachment 7 (Ref. 4) is consistent with the changes made to the Implementation Schedule for PSL Unit 2 Commitment No. 13 provided in RAI Set 2, Attachment 5 (Ref. 3).
3. The response to RAI Set 3, Attachment 7, page 18 of 23 (Ref. 4) inadvertently referred to PSL Unit 1 in the header of Table 19-3.

#### **Resolutions**

1. The Table 19-3 header in the response to Supplement 1, Attachment 18, page 32 of 38 (Ref. 2) should have referred to PSL Unit 2.
2. For clarification, the final version of SLRA Appendix A2, Section 19.4, Table 19-3, Commitment No. 13, with all the appropriate revisions, is provided on the following page.
3. The Table 19-3 header in the response to RAI Set 3, Attachment 7, page 18 of 23 (Ref. 4) should have referred to PSL Unit 2.

SLRA Appendix A2, Section 19.4, Table 19-3, page A2-72, is clarified as follows:

**Table 19-3**  
**List of Unit 2 SLR Commitments and Implementation Schedule**

<b>No.</b>	<b>Aging Management Program or Activity (Section)</b>	<b>NUREG-2191 Section</b>	<b>Commitment</b>	<b>Implementation Schedule</b>
13	Steam Generators (19.2.2.10)	XI.M19	a) Continue the existing PSL Steam Generators AMP.	No later than 6 months prior to the SPEO, i.e.: PSL2: 10/06/2042

**Clarification of PSL Unit 2 Commitment No. 20**

**Affected SLRA Sections:** Appendix A2, Section 19.4, Table 19-3, Commitment No. 20

**Issue**

The response to Supplement 1, Attachment 7 (Ref. 2) made inconsistent changes to the Implementation Schedule for PSL Unit 1 Commitment 20 (page 4 of 33) and PSL Unit 2 Commitment 20 (page 16 of 33). Specifically, the PSL Unit 1 Commitment 20 Implementation Schedule (page 4 of 33) deleted the words “No later than 6 months prior to the SPEO, or no later than the last refueling outage prior to the SPEO i.e.:”. However, the PSL Unit 2 Commitment 20 Implementation Schedule (page 16 of 33) inadvertently did not delete these same words.

**Resolutions**

For clarification, the final version of SLRA Appendix A2, Section 19.4, Table 19-3, Commitment No. 20, with all the appropriate revisions, is provided on the following pages.

SLRA Appendix A2, Section 19.4, Table 19-3, starting on page A2-83, is clarified as follows:

**Table 19-3  
List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
20	Outdoor and Large Atmospheric Metallic Storage Tanks (19.2.2.17)	XI.M29	<p>Continue the existing PSL Outdoor and Large Atmospheric Metallic Storage Tanks AMP, including enhancement to:</p> <p>a) Create a new procedure, and/or associated preventive maintenance activities, to:</p> <ul style="list-style-type: none"> <li>• Address the interfaces, handoffs, and overlaps between the PSL Outdoor and Large Atmospheric Metallic Storage Tanks AMP and the following AMPs: <ul style="list-style-type: none"> <li>○ PSL Structures Monitoring AMP;</li> <li>○ PSL External Surfaces Monitoring of Mechanical Components AMP;</li> <li>○ PSL Water Chemistry AMP;</li> <li>○ PSL One-Time Inspection AMP,</li> <li>○ PSL Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks AMP; and</li> <li>○ PSL ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD AMP.</li> </ul> </li> <li>• Direct periodic (18-month interval) visual inspection of tank-to-concrete caulking/sealants, with mechanical manipulation as appropriate. Update or reactivate existing caulking/sealant inspection preventive maintenance activities and create new caulking/sealant inspection preventive maintenance activities as needed. These caulking/sealant inspections are performed by the PSL Structures Monitoring AMP.</li> </ul>	<p>Program inspections or tests begin 10 years before the SPEO. One-time inspections begin 5 years prior to the SPEO. Inspections or tests that are to be completed prior to the SPEO are completed 6 months prior to the SPEO or no later than the last refueling outage prior to the SPEO.</p> <p>Program and SLR enhancements are implemented 6 months prior to the SPEO, i.e.:</p> <p>PSL2: 10/06/2042</p>



**Table 19-3**  
**List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
			<ul style="list-style-type: none"> <li>• Direct the 10-year bottom thickness measurement of the U2 RWT, U2 PWST, and the U2 CST, using low-frequency electromagnetic testing (LFET) techniques with follow-on UT examination, as necessary, at discrete tank locations identified by LFET.</li> <li>• Direct baseline one-time interior visual inspections of the U2 RWT. Direct 10-year surface examination inspections of the stainless steel U2 RWT's interior nonwetted surface and exterior surface for evidence of loss of material and cracking. The surface examinations will inspect 25 1-square-foot sections or 25 1-linear-foot sections of welds. If evidence of cracking is identified, then a surface examination is also performed to determine the extent of the cracking.</li> <li>• Clarify that subsequent inspections are conducted in different locations unless this AMP includes a documented basis for conducting repeated volumetric and surface inspections in the same location.</li> <li>• Clarify that inspections and tests are performed by personnel qualified in accordance with site procedures to perform the specified task.</li> <li>• Clarify that inspections and tests within the scope of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) follow procedures consistent with the ASME Code, including ASME Code Section XI. Non-ASME Code inspections and tests follow site procedures that include considerations such as lighting, distance offset, surface coverage, presence of protective coatings, and cleaning processes.</li> </ul>	

**Table 19-3**  
**List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
			<ul style="list-style-type: none"> <li>• Clarify that where practical, identified degradation is projected until the next scheduled inspection, or in the case of one-time inspections, identified degradation is projected to the end of the SPEO.</li> <li>• Clarify that results are evaluated against acceptance criteria to confirm or adjust timing of subsequent inspections, or in the case of one-time inspections, schedule follow-up inspections.</li> <li>• State the acceptance criteria as follows: <ul style="list-style-type: none"> <li>○ No degradation of paints or coatings (e.g., cracking, flakes, or peeling), or the U2 PWST internal floating roof;</li> <li>○ No non-pliable, cracked, or missing caulking/sealant for the tank bottom interface;</li> <li>○ No indications of cracking of a stainless steel tank (U2 RWT), and;</li> <li>○ Measured or projected tank bottom thickness must be greater than 87.5% of the nominal plate thickness.</li> </ul> </li> <li>• State the appropriate corrective actions to perform for when degradation (e.g., sealant/caulking flaws, paint/coating flaws, loss of material, cracking, etc.) is identified, which include the following: <ul style="list-style-type: none"> <li>○ Report degradation via a condition report (CR) then perform an engineering evaluation or repair/replace the degraded component as needed.</li> <li>○ Repair or replace the degraded component as determined by engineering evaluation and perform</li> </ul> </li> </ul>	

**Table 19-3  
List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
			<p>follow-up examinations. For one-time inspections that do not meet acceptance criteria, inspections are subsequently conducted at least at 10-year inspection intervals.</p> <ul style="list-style-type: none"> <li>○ For other sampling-based inspections (e.g., 20%, 25 locations) the smaller of five additional inspections or 20% of the inspection population is conducted. If subsequent inspections do not meet acceptance criteria, an extent of condition and extent of cause is conducted to determine the further extent of inspection. The additional inspections include inspections at all of the Units with the same material, environment, and aging effect combination.</li> </ul> <p>Sample expansion inspections that happen in the next inspection interval are part of the preceding interval.</p> <p>b) Perform baseline one-time interior visual inspections of the U2 RWT. Perform 10-year surface examination inspections of the stainless steel U2 RWT's interior nonwetted surface and exterior surface for evidence of loss of material and cracking. The surface examinations will inspect 25 1-square-foot sections or 25 1-linear-foot sections of welds. If evidence of cracking is identified, then a surface examination is also performed to determine the extent of the cracking.</p> <p>c) Perform 10-year LFET tank bottom thickness examinations of the U2 RWT, U2 PWST, and the U2 CST, with follow-on UT at discrete locations.</p>	

### **Clarification of PSL Unit 2 Commitment No. 24**

**Affected SLRA Sections:** Appendix A2, Section 19.4, Table 19-3, Commitment No. 24

#### **Issues**

1. The response to RAI Set 4 Supplemental Response, Attachment 3, page 37 of 41 (Ref. 5) inadvertently referred to PSL Unit 1 in the header of Table 19-3.
2. The response to Supplement 1, Attachment 7, page 19 of 33 (Ref. 2), made changes to the Implementation Schedule of Commitment No. 24. The response to RAI Set 4 Supplemental Response, Attachment 3, page 37 of 41 (Ref. 5), made changes to the commitment scope of Commitment No. 24, but, inadvertently omitted the Implementation Schedule changes previously made by Supplement 1, Attachment 7 (Ref. 2).

#### **Resolutions**

1. The Table 19-3 header in the response to RAI Set 4 Supplemental Response, Attachment 18, page 37 of 41 (Ref. 5) should have referred to PSL Unit 2.
2. For clarification, the final version of SLRA Appendix A2, Section 19.4, Table 19-3, Commitment No. 24, with all the appropriate revisions, is provided on the following page.

SLRA Appendix A2, Section 19.4, Table 19-3, page A2-89, is clarified as follows:

**Table 19-3  
List of Unit 2 SLR Commitments and Implementation Schedule**

<b>No.</b>	<b>Aging Management Program or Activity (Section)</b>	<b>NUREG-2191 Section</b>	<b>Commitment</b>	<b>Implementation Schedule</b>
24	Selective Leaching (19.2.2.21)	XI.M33	<p>Implement the new PSL Selective Leaching AMP, including the following additional actions:</p> <ul style="list-style-type: none"> <li>a) To confirm that loss of material due to selective leaching is an aging effect unique to the external surfaces of the Unit 1 EDG copper alloy with greater than 15 percent zinc radiator tubes, PSL will perform a one-time inspection of a representative sample of Unit 1 and 2 copper alloy with greater than 15 percent zinc components exposed to an air-outdoor external and air-outdoor internal environments, as applicable, prior to the SPEO. This inspection will be performed in accordance with the Selective Leaching AMP and will be considered a separate inspection population.</li> <li>b) In addition, PSL will perform a one-time inspection of the Unit 2 EDG Admiralty brass radiator tubes exposed to an air-indoor uncontrolled external environment prior to the SPEO. This inspection will be performed in accordance with the Selective Leaching AMP and will be considered a separate inspection population.</li> </ul>	<p>Program inspections begin 10 years before the SPEO. Inspections that are to be completed prior to the SPEO are completed 6 months prior to the SPEO or no later than the last refueling outage prior to the SPEO.</p> <p>Program and SLR enhancements are implemented 6 months prior to the SPEO, i.e.:</p> <p>PSL2: 10/06/2042</p>

**Clarification of PSL Unit 2 Commitment No. 25**

**Affected SLRA Sections:** Appendix A2, Section 19.4, Table 19-3, Commitment No. 25

**Issue**

The response to Supplement 1, Attachment 7, page 20 of 33 (Ref. 2) revised the first sentence of the Implementation Schedule for Commitment 25 to state “Program inspections are completed 6 years before the SPEO.” This verbiage conflicts with NUREG-2191, Table XI-01 for AMP XI.M35, which states, “Program is implemented and inspections are completed within 6 years before the subsequent period of extended operation.”

**Resolution**

For clarification, the final version of SLRA Appendix A2, Section 19.4, Table 19-3, Commitment No. 25, to include the word “within”, is provided on the following page.

SLRA Appendix A2, Section 19.4, Table 19-3, page A2-90, is clarified as follows:

**Table 19-3  
 List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
25	ASME Code Class 1 Small-Bore Piping (19.2.2.22)	XI.M35	Continue the existing PSL ASME Code Class 1 Small-Bore Piping AMP, which includes: a) Perform one-time inspection of small-bore piping using the methods, frequencies, and acceptance criteria as outlined in NUREG-2191, Section XI.M35. b) Evaluate the results to determine if additional or periodic inspections are required and perform any required additional inspections.	Program inspections are completed within 6 years before the SPEO. Inspections that are to be completed prior to the SPEO are completed 6 months prior to the SPEO or no later than the last refueling outage prior to the SPEO. Program and SLR enhancements are implemented 6 months prior to the SPEO, i.e.: PSL2: 10/06/2042

**Clarification of PSL Unit 2 Commitment No. 36**

**Affected SLRA Section:** Appendix A2, Section 19.4, Table 19-3, Commitment No. 36

**Issue**

The response to RAI Set 2, Attachment 16, pages 10, 11 and 12 of 13 (Ref. 3) inadvertently referred to PSL Unit 1 in the header of Table 19-3.

**Resolution**

The Table 19-3 header in the response to RAI Set 2, Attachment 16, pages 10, 11 and 12 of 13 (Ref. 3) should have referred to PSL Unit 2.

For clarification, the final version of SLRA Appendix A2, Section 19.4, Table 19-3, Commitment No. 36, with "Unit 2" added to the header of Table 19-3, is provided on the following pages.



SLRA Appendix A2, Section 19.4, Table 19-3, pages A2-103 and A2-104, are clarified as follows:

**Table 19-3  
List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
36	Structures Monitoring (19.2.2.33)	XI.S6	<p>Continue the existing PSL Structures Monitoring AMP, including enhancement to:</p> <ul style="list-style-type: none"> <li>a) Monitor and inspect steel edge supports on masonry walls.</li> <li>b) Specify the use of high-strength bolt storage requirements discussed in Section 2 of the Research Council for Structural Connections publication, "Specification for Structural Joints Using High-Strength Bolts," for structural bolting consisting of ASTM A325, ASTM A490, and equivalent bolts.</li> <li>c) Inspect concrete structures for increase in porosity and permeability, loss of strength, and reduction in concrete anchor capacity due to local concrete degradation.</li> <li>d) Inspect elastomers for loss of material and cracking.</li> <li>e) Inspect stainless steel and aluminum components for pitting and crevice corrosion, and evidence of cracking due to SCC.</li> <li>f) Include monitoring and trending of leakage volumes and chemistry for signs of concrete or steel reinforcement degradation if active through-wall leakage or groundwater infiltration is identified.</li> <li>g) Specify that all bolting is monitored for loss of material, loose bolts, missing or loose nuts, and other conditions indicative of loss of preload.</li> <li>h) Include tactile inspection in addition to visual inspection of elastomeric elements to detect hardening.</li> <li>i) Include evidence of water in-leakage as a finding requiring further evaluation. This may include engineering evaluation, more</li> </ul>	<p>No later than 6 months prior to the SPEO, i.e.:</p> <p>PSL2: 10/06/2042</p>

**Table 19-3  
List of Unit 2 SLR Commitments and Implementation Schedule**

No.	Aging Management Program or Activity (Section)	NUREG-2191 Section	Commitment	Implementation Schedule
			<p>frequent inspections, or destructive testing of affected concrete to validate existing concrete properties, including concrete pH levels. When leakage volumes allow, assessment may include analysis of the leakage pH, along with mineral, chloride, sulfate, and iron content in the water.</p> <p>j) Develop a new implementing procedure or attachment to an existing implementing procedure to address aging management of inaccessible areas exposed to groundwater/soil and water-flowing. The document will include guidance to conduct a baseline visual inspection, pH analysis, and a chloride concentration test prior to the SPEO at a location close to the coastline/intake and a location in the main plant area for comparison. The baseline inspection results will be used to conduct a baseline evaluation that will determine the additional actions (if any) that are warranted. Additionally, the baseline evaluation results will set the subsequent inspection requirements and inspection intervals (not to exceed 5 years). Periodic inspections (focused) and evaluation updates (not to exceed 5 years) will be performed throughout the SPEO to ensure aging of inaccessible concrete is adequately managed. Opportunistic inspections may be used to replace or supplement the focused inspections if the inspection location is excavated for other reasons during the periodic inspection interval.</p> <p>k) Require inspections of the Condensate Storage Tank (CST) and Auxiliary Feedwater (AFW) Structures and Piping Inspections in the Trenches every third refueling outage, which will ensure that these inspections are performed at least once per 5 years.</p> <p>l) Include stainless steel ASME Class 1, 2, or 3 support members, welds, bolted connections, or anchorage in the engineering evaluation of acceptance criteria, expansion criteria, and examination frequency if cracking due to SCC in the uncontrolled</p>	

**Table 19-3**  
**List of Unit 2 SLR Commitments and Implementation Schedule**

<b>No.</b>	<b>Aging Management Program or Activity (Section)</b>	<b>NUREG-2191 Section</b>	<b>Commitment</b>	<b>Implementation Schedule</b>
			indoor and outdoor air at PSL is detected for stainless steel mechanical or non-ASME structural components.	

## **References**

1. FPL Letter L-2022-154 dated September 22, 2022 – Subsequent License Renewal Application Revision 1 – Supplement 4 (ADAMS Accession No. ML22265A134)
2. FPL Letter L-2022-043 dated April 7, 2022 – Subsequent License Renewal Application Revision 1 – Supplement 1 (ADAMS Accession No. ML22097A202)
3. FPL Letter L-2022-108 dated July 11, 2022 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 2 Response (ADAMS Accession No. ML22192A078)
4. FPL Letter L-2022-115 dated August 9, 2022 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 3 Response and Submittal of Superseded Response for One Set 2 RAI and One Supplement 1 Attachment (ADAMS Accession No. ML22221A134)
5. FPL Letter L-2023-059 dated April 21, 2023 – Subsequent License Renewal Application – Aging Management Requests for Additional Information (RAI) Set 4 Supplemental Response (ADAMS Accession No. ML23111A129)