



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

August 3, 2023

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 –
AUDIT PLAN IN SUPPORT OF REVIEW OF LICENSE AMENDMENT
REQUESTS REGARDING FLEET EMERGENCY PLAN AMENDMENT
(EPID L-2022-LLA-0146)

Dear Mr. Coffey:

By letter dated October 4, 2022, as supplemented by letter dated December 9, 2022 (Agencywide Documents Access and Management System Accession (ADAMS) Nos. ML22278A031 and ML22343A254, respectively), Florida Power & Light Company, NextEra Energy Point Beach, LLC, and NextEra Energy Seabrook, LLC (collectively, NextEra or the licensee), submitted a license amendment request (LAR) 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, to the U.S. Nuclear Regulatory Commission (NRC) for review and prior approval pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR). Specifically, the proposed license amendment request would create a new fleet common emergency plan with site-specific annexes developed utilizing NUREG 0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support Nuclear Power Plants," Revision 2 dated December 2019 (ML19347D139), (NUREG-0654).

During the review of the LAR, the NRC staff identified several items that require further clarification and detailed explanations. The NRC staff will conduct a regulatory audit to support its review of the LAR in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information. The audit will be conducted to increase the NRC staff's understanding of the LARs identifying information that will require docketing to support the NRC staff's regulatory findings.

The audit will be conducted using video and teleconferencing and secure, online portal. The audit plan and supporting materials are enclosed.

B. Coffey

- 2 -

If you have any questions, please contact me by telephone at 301-415-2048 or by e-mail to Justin.Poole@nrc.gov.

Sincerely,

/RA/

Justin 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:
Audit Plan

cc: Listserv



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

REGULATORY AUDIT PLAN

REGARDING LICENSE AMENDMENT REQUEST TO

CREATE A FLEET EMERGENCY PLAN

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

NEXTERA ENERGY RESOURCES/FLORIDA POWER & LIGHT COMPANY, ET AL.

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

1.0 BACKGROUND

By letter dated October 4, 2022, as supplemented by letter dated December 9, 2022 (Agencywide Documents Access and Management System Accession (ADAMS) Nos. ML22278A031 and ML22343A254, respectively), Florida Power & Light Company, NextEra Energy Point Beach, LLC, and NextEra Energy Seabrook, LLC (collectively, NextEra or the licensee), submitted a license amendment request (LAR) 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, to the U.S. Nuclear Regulatory Commission (NRC) for review and prior approval pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR). Specifically, the proposed license amendment request would create a new fleet common emergency plan with site-specific annexes developed utilizing NUREG 0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support Nuclear Power Plants," Revision 2 dated December 2019 (ML19347D139), (NUREG-0654).

The staff from the NRC's Office of Nuclear Security and Incident Response (NSIR) has initiated its review of the LAR in accordance with Nuclear Reactor Regulation (NRR) Office Instruction (OI) LIC-101, "License Amendment Review Procedures" (ML19248C539).

2.0 REGULATORY AUDIT BASES

A regulatory audit is a planned license- or regulation-related activity that includes the examination and evaluation of information that provides the technical basis for the LAR. An audit is conducted to gain understanding, to verify information, and to identify information that will require docketing to support the basis of a licensing or regulatory decision. An audit will assist the NRC staff in efficiently conducting its review and gaining insights to the licensee's processes and procedures. Information that the NRC staff relies upon

to make the safety determination must be submitted on the docket. This audit will be conducted in accordance with NRR OI LIC-111, "Regulatory Audits," (ML19226A274) for the NRC staff to examine the licensee's non-docketed information with the intent to gain a better understanding of the LARs, to verify information, and to identify information that may require docketing to support the basis of the NRC staff's licensing decision.

The NRC staff will perform the audit to support its evaluation of whether the licensee's request can be approved per 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit." The staff's review will be informed by the standards of section 50.47, "Emergency plans," of Title 10 of the *Code of Federal Regulations* and the requirements of Appendix E to 10 CFR Part 50, "Emergency Planning and Preparedness for Production and Utilization Facilities." The audit will assist the NRC staff with understanding the licensee's proposed fleet emergency plan and associated changes made in staffing requirements.

3.0 SCOPE

The audit team will view the documentation and calculations that provide the technical support for the LAR. The scope of the NRC staff's audit will focus on the request for additional information sent by the NRC staff to the licensee on June 22, 2023 (ML23173A152).

Specifically, the NRC staff will be seeking to understand how the capabilities for Command and Control, Communication, Radiation Protection, Field Monitoring (on and/or near site), and Repair Team Activities will be maintained. If any of these capabilities would not be maintained, the NRC staff is seeking sufficient justification to deviate from the guidance provided in NUREG-0654, Revision 2.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The NRC staff will request information and interviews throughout the audit period. The NRC staff will use an "audit items list" to identify the information (e.g., methodology, process information, and calculations) to be audited and the subjects of requested interviews and meetings.

The NRC staff requests the licensee to have the information referenced in the attachment of this audit plan available and accessible for the NRC staff's review via a web portal within one week of the date of this audit plan. The NRC staff requests the licensee to notify the review team when an audit item is added to its portal by sending an e-mail to the NRC licensing project manager.

The staff acknowledges and will observe appropriate handling and protection of proprietary information made available for the audit. The NRC staff will not remove non-docketed information from the audit site or web portal.

5.0 AUDIT TEAM

The following list identifies the NRC audit team members, and their respective focus areas:

- Justin Poole, Licensing Project Manager, Justin.Poole@nrc.gov
- Michael Norris, Senior Emergency Preparedness Specialist, Michael.Norris@nrc.gov
- Raymond Hoffman, Emergency Preparedness Specialist, Raymond.Hoffman@nrc.gov

6.0 LOGISTICS

The audit will be conducted remotely using video and teleconferencing and a secure, online portal, established by the licensee, as well as a possible site visit by the NRC staff. The audit will begin within one week of the date of this audit plan and last through November 30, 2023. The NRC will establish an audit meeting(s) (e.g., a single, multi-day audit meeting; periodic audit meetings throughout the audit period) on mutually agreeable dates and times to discuss information needs and questions arising from the NRC's review of the audited items. The NRC's licensing project manager will inform the licensee of audit meeting dates when they are established, including the date of an audit kick-off meeting.

7.0 SPECIAL REQUESTS

The following conditions associated with the online portal must be maintained throughout the duration so that the NRC staff and contractors on the audit team has access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff and contractors who are on the audit team.
- The online portal will be sufficiently secure to prevent the NRC staff and contractors from printing, saving, downloading, or collecting any information from the web portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgment by each user.

NextEra should provide username and password information directly to the NRC staff on the audit team, listed above. The NRC project manager will provide NextEra the names and contact information of any additional the NRC staff and contractors who are added to the audit team. All other communications should be coordinated with the NRC project manager. The NRC's licensing project manager will inform the licensee via routine communications when the NRC staff no longer needs access to the portal.

No information accessed by the audit team members will be retained by the NRC following the conclusion of the audit.

8.0 DELIVERABLES

The NRC staff will issue an audit summary report within 90 days of the audit exit interview and prior to completing its safety evaluation of the LAR.

ATTACHMENT: AUDIT REQUESTS

| ITEM | AUDIT REQUEST |
|------|---|
| R1 | <p>a. Provide objective evidence, in the form of an analysis or study, that demonstrates there will be no adverse impact on on-site or off-site emergency response if Command and Control augmentation is extended to 90 minutes.</p> <p>b. If no objective evidence that could support the proposed extension of ERO augmentation for command and control, explain how appropriate Command and Control augmentation will be provided for the period of 60 to 90 minutes.</p> <p>c. Provide an individual who could speak to the responsibilities of the shift manager during abnormal and emergency conditions.</p> |
| R2 | <p>a. Provide objective evidence, in the form of an analysis or study, that demonstrates there will be no adverse impact on on-site or off-site emergency response if one communicator is assigned, who may be performing concurrent duties if communication ERO response is extended to 90 minutes. This objective evidence should address the following:</p> <ul style="list-style-type: none"> • 10 CFR 50.72(c)(3) requires reactor licensees to maintain continuous communications with the NRC when they are requested to do so. • Information Notice 85-80, "Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications," that reiterated licensees' event notification responsibility to provide enough on-shift personnel knowledgeable about plant operations and emergency plan implementation to enable timely, accurate, and reliable reporting of operating events without interfering with plant operation. • There would be increasing communications with OROs seeking information related to the event as time progresses. • There would be increasing communications with site/facility organizations related to the event as time progresses. |
| R3 | <p>a. Provide an individual who can discuss RP related RAIs 9 and 10. This individual should be prepared to discuss the following:</p> <ul style="list-style-type: none"> • What level of training the RPQIs would possess. This should include minimum experience, knowledge, and radiation protection roles during normal and off-normal conditions. • How will the RPQI be supervised as needed during radiological events. |
| R4 | <p>a. Provide an individual who can discuss on-shift dose assessment capability. This discussion should include core damage assessments.</p> |
| R5 | <p>a. Provide the procedure, guidance, or knowledgeable individual(s) that can describe how the field monitoring function is performed if needed to identify the magnitude of an unmonitored radiological release.</p> <p>b. Provide an explanation or discussion regarding the time it would reasonably take to ensure that an unmonitored release was not occurring given the various potential release heights, release locations, and atmospheric conditions that could exist during a radiological event.</p> |

ATTACHMENT: AUDIT REQUESTS

| ITEM | AUDIT REQUEST |
|-------------|--|
| R6 | <ul style="list-style-type: none">a. Provide the site-specific FLEX strategies for each of the NextEra facilities.b. Describe the locations where on-shift staff would need to access to implement FLEX strategies.c. Provide an explanation or knowledgeable individual that describes how radiation protection burden would be reduced or minimized during FLEX implementation based on the above access locations or other elements of the FLEX strategy.d. Provide objective evidence, in the form of an analysis or study, that FLEX strategy is sufficiently reliable to justify the extension of maintenance support personnel emergency response organization response times. |

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 – AUDIT PLAN IN SUPPORT OF REVIEW OF LICENSE AMENDMENT REQUESTS REGARDING FLEET EMERGENCY PLAN AMENDMENT (EPID L-2022-LLA-0146) DATED AUGUST 3, 2023

DISTRIBUTION:

PUBLIC
 RidsNrrPMPointBeach Resource
 RidsNrrPMSeabrook Resource
 RidsNrrPMStLucie Resource
 RidsNrrPMTurkeyPoint Resource
 RidsNrrDorlLpl1 Resource
 RidsNrrDorlLpl2-2 Resource
 RidsNrrDorlLpl3 Resource
 RidsRgn1MailCenter Resource
 RidsRgn2MailCenter Resource
 RidsRgn3MailCenter Resource
 RidsACRS_MailCTR Resource
 RidsNrrLAKZelevnock Resource
 RidsNsirDprRlb Resource
 TKeene, OEDO

ADAMS Accession No. ML23201A087

| | | | |
|--------|------------------|------------------|--------------------|
| OFFICE | NRR/DORL/LPL1/PM | NRR/DORL/LPL1/LA | NSIR/DPR/RLB/BC(A) |
| NAME | JPoole | KZelevnock | NDifrancesco |
| DATE | 07/28/2023 | 07/25/2023 | 07/28/2023 |
| OFFICE | NRR/DORL/LPL1/BC | NRR/DORL/LPL1/PM | |
| NAME | HGonzalez | JPoole | |
| DATE | 08/03/2023 | 08/03/2023 | |

OFFICIAL RECORD COPY