

From: Michael Mahoney
Sent: Tuesday, October 24, 2023 2:57 PM
To: Mack, Kenneth
Cc: Mack, Jarrett
Subject: Change in Estimated Review Schedule For Turkey Point Revise Fire Protection Program to Support RCP Replacement Seal LAR (L-2022-LLA-0128)

Mr. Ken Mack,

By letter dated August 26, 2022 (ML22243A161), Florida Power and Light Company (FPL, the licensee) submitted a license amendment request for the Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). By letters dated May 32 (ML23151A606) and July 27 (ML23208A191), and August 25 (ML23240A152) FPL provided supplements to this submittal. The proposed license amendments were requested in accordance with operating license, paragraph 3.D, Fire Protection, for fire protection program changes that may be made without prior NRC approval. One of the criteria for such a change is that the risk increase resulting from the change is less than 1×10^{-7} /year (yr) for Core Damage Frequency (CDF) and less than 1×10^{-8} /yr for Large Early Release Frequency (LERF). The change is to support replacement of the currently installed reactor coolant pump (RCP) seals with the Framatome RCP hydrostatic seal package equipped with the Passive Shutdown Seal (PSDS). On September 21, 2022 (ML22264A007), the NRC staff notified you that your request had been accepted for review, and the NRC staff estimated it would complete the review by September 21, 2023, and require 650 hours.

The staff identified the need for a regulatory audit due to the complexity of the LAR. Staff provided the audit plan to FPL on January 5, 2023 (ML23006A026). Multiple virtual audit meetings were held from March to June 2023, to discuss questions from the staff in the areas of probabilistic risk assessment, human factors and RCP replacement seal design. The staff held a meeting on June 29, 2023, which exited the audit. As a result of the remote regulatory audit, RAIs were issued to FPL on May 5, 2023 (ML23129A832) and August 14, 2023 (ML23226A075). FPL provided responses to the RAIs in supplements dated May 31, 2023 (ML23151A607), July 27, 2023 (ML23208A191), and August 25, 2023 (ML23240A153). FPL is planning a supplement to be submitted by end of October 2023 which will supplement its August 25, 2023, RAI response to provide additional information on operator actions the licensee is planning to take to ensure PSDS actuates under certain conditions.

During routine interactions by phone on October 2, 2023, the assigned project manager informed you of a delay in the schedule to complete the subject LAR due to the complex nature of the LAR. Additionally, it is my understanding that the implementation of these amendments has been changed. In your letter dated August 25, 2023 (ML23240A153), you stated that in the original LAR that RCP seal replacement was scheduled to occur in the Unit 3 2023 fall refueling outage and now installation of the RCP replacement seals is scheduled to occur beginning with the Unit 4 2025 spring outage, scheduled for March 2025.

The purpose of this email is to officially inform you that the NRC staff now expects to complete its review by February 29, 2024, and require 735 hours. This estimate could change due to several factors such as requests for additional information and an unanticipated addition of scope to the review. If there are emergent complexities or challenges in our review that would result in a change to the estimated completion date or significant changes in the estimated hours, the reasons for the change, and a revised estimate will be communicated during routine

interactions with the assigned project manager. The change in the estimated completion date was discussed with and approved by the Deputy Director for the Division of Operating Reactor Licensing.

Thanks

Mike Mahoney

Project Manager, LPL2-2

Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

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