

From: [Blake Purnell](#)
To: [Valdez, Maribel](#)
Cc: [Mack, Jarrett](#); [Mack, Kenneth](#); [David Wrona](#)
Subject: Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Request for Additional Information Regarding Proposed Amendment to Revise Pressurizer Heater Requirements
Date: Monday, June 30, 2025 1:15:00 PM
Attachments: RAI Turkey Point LAR to Revise Pressurizer Heater TS.pdf

Ms. Valdez,

By letter dated March 26, 2025 (Agencywide Documents Access and Management System Accession No. ML25085A134), Florida Power & Light Company (the licensee) submitted a license amendment request (LAR) for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed amendments would revise Turkey Point Technical Specification 3.4.9, "Pressurizer," by removing the pressurizer heater group emergency power supply requirements.

The U.S. Nuclear Regulatory Commission staff is reviewing the LAR and has determined that the additional information is needed for the staff to complete its review. A response to the attached request for additional information (RAI) is requested to be provided within 30 days of the date of this email. A preliminary draft of this RAI was provided to the licensee on June 20, 2025, and a revised draft of this RAI was provided on June 27, 2025. The licensee indicated that no clarification call was needed. Please contact me if you have any questions.

Sincerely,

Blake Purnell, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

Docket Nos. 50-250 and 50-251
EPID L-2025-LLA-0060

OFFICE	NRR/DORL/LPL2-2/PM	NRR/DEX/EEEB/BC	NRR/DSS/STSB/BC
NAME	BPurnell	WMorton	SMehta
DATE	6/30/2025	6/26/2025	6/25/2025
OFFICE	NRR/DORL/LPL2-2/BC		
NAME	DWrona		
DATE	6/27/2025		

REQUEST FOR ADDITIONAL INFORMATION
PROPOSED AMENDMENT TO REVISE PRESSURIZER HEATER REQUIREMENTS
FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4
DOCKET NOS. 50-250 AND 50 251

By letter dated March 26, 2025 (Agencywide Documents Access and Management System Accession No. ML25085A134), Florida Power & Light Company (the licensee) submitted a license amendment request (LAR) for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed amendments would revise Turkey Point Technical Specification (TS) 3.4.9, "Pressurizer," by removing the pressurizer heater group emergency power supply requirements.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the LAR and has determined that the additional information below is needed for the staff to complete its review.

Regulatory Basis

The regulation at 10 CFR 50.36(c)(2) requires that TSs include limiting conditions for operation, which are "the lowest functional capability or performance levels of equipment required for safe operation of the facility." The regulation also requires that when a limiting condition for operation is not met, the licensee "shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met."

Request for Additional Information (RAI) 1

The LAR would, in part, delete Condition C, Required Action C.1, and the associated completion time in TS 3.4.9. However, TS 3.4.9 also specifies remedial actions to take under Condition D, "Required Action and associated Completion Time of Condition B or C not met." The LAR does not propose to revise Condition D even though Condition C would be deleted, which appears to be an administrative oversight. Explain why a revision to Condition D is not needed or propose changes to the TSs, as appropriate.

RAI 2

The LAR references the NRC NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," published July 1979 (ML090060030).¹ The "Requirement History" section of the LAR states, in part, "NUREG-0578, Item 2.1.1, *Loss of Normal Power*, stated in part, that the capability to align one group of pressurizer heaters to the emergency on-site power supply shall be provided." The NRC staff could not find this information in NUREG-0578. In contrast, NUREG-0578 Section 2.1.1, "Emergency Power Supply Requirements for the Pressurizer Heaters, Power-Operated Relief and Block Valves, and Pressurizer Level indicators in PWRs [Pressurized-Water Reactors]," recommends that licensees "provide redundant emergency power for the minimum number of pressurizer heaters required to maintain natural circulation in the event of loss of offsite power."

¹ TMI and TMI-2 refer to Three Mile Island Nuclear Station, Unit No. 2.

Given these apparent discrepancies, provide information and references to support the "Requirement History" description in the LAR or provide a revised "Requirement History" description with accurate information and references to support the LAR.

RAI 3

Item II.E.3.1, "Emergency Power Supply for Pressurizer Heaters" in NRC NUREG-0737, "Clarification of TMI Action Plan Requirements" (ML102560051)," Enclosure 3, states, in part, that "the required heaters and their controls shall be connected to the emergency buses in a manner that will provide redundant power supply capability." The LAR states, in part, that the proposed change is consistent with the Standard Technical Specifications for facilities with two required pressurizer heater groups normally aligned to Class 1E emergency power. The NRC staff notes that the enclosure uses the term "aligned" when describing the power supply for the pressurizer heater groups. It is not clear whether the term "aligned" has the same meaning as "connected" as stated in the mentioned above NUREG-0737. Clarify how the term "aligned" is used in the LAR as compared to the term "connected" as used in NUREG-0737.