



February 13, 2015
L-2015-018

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Florida Power and Light Company's, Turkey Point Units 3 and 4, Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

References:

1. U.S. Nuclear Regulatory Commission, Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately), dated March 12, 2012 ML 12056A044.
2. FPL Letter, L-2013-062, Florida Power and Light Company's, Turkey Point Units 3 and 4, Overall Integrated Plan in Response to March 12, 2012 U.S. Nuclear Regulatory Commission's Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2013 ML130720690.
3. NRC Letter, Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent fuel Pool Instrumentation (Order No. EA-12-051) (TAC Nos. MF0988 and MF0989), dated July 11, 2013, ADAMS Accession No. ML13191A134
4. FPL Letter, L-2013-225, Florida Power and Light Company's, Turkey Point Units 3 and 4 Response to Request for Additional Information Regarding Overall Integrated Plan in Response to Order EA-12-015 "Reliable Spent Fuel Pool Instrumentation," dated July 30, 2013, ADAMS Accession No. ML13224A160
5. FPL Letter L-2013-248, Florida Power & Light Company's Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, Accession No. ML13248A313.

Received @ DCD on 3/13/15

ADD 1
NRR

6. NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0988 and MF0989) dated November 19, 2013, Accession No. ML13280A177.
7. FPL Letter L-2014-042, Florida Power & Light Company's Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2014 Accession No. ML14073A066.
8. U.S. Nuclear Regulatory Commission, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051", dated March 26, 2014.
9. FPL Letter L-2014-244, Florida Power & Light Company's Turkey Point Units 3 and 4, Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 15, 2014 Accession No. ML14245A057.

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees including Florida Power and Light Company's (FPL) Turkey Point. In Reference 2, FPL submitted an Overall Integrated Plan for the implementation of this Order. The NRC requested additional information (RAI) (Reference 3) and FPL responded by letter L-2013-225 (Reference 4).

Subsequently, FPL provided the First 6-month status report by letter L-2013-248 (Reference 5). On November 19, 2013, the NRC issued the interim Staff Evaluation (Reference 6) which included RAIs. FPL provided the Second 6-month status report by letter L-2014-042 and response to RAIs 12 and 13 a, b, c. On March 26, 2014, the NRC issued an audit plan to review Licensee submittals (Reference 8) by synchronizing the NRC's review to the site's compliance date. In Reference 8, the NRC requested FPL to place the response to the remaining RAIs on the e-portal. FPL discussed with the NRC's Project Manager Mr. Jason Paige that the responses to these RAIs will be available on the e-portal by February 28, 2015. In Reference 9, FPL provided the Third 6-month status report.

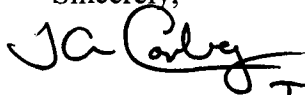
The purpose of this letter is to provide the Fourth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosure to this letter provides a status update since the last report of milestone accomplishments, any changes to the compliance method, schedule, and need for relief, if any. As requested by the NRC, RAI responses will be provided to the NRC via the e-portal.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Turkey Point Licensing Manager, at 305-246-6698.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on February 13, 2015

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

Sincerely,



T. Conway for M. Kiley

Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Enclosure

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant

L-2015-018

ENCLOSURE

**FLORIDA POWER & LIGHT COMPANY'S
TURKEY POINT UNITS 3 and 4
FOURTH SIX MONTH STATUS REPORT IN RESPONSE TO
MARCH 12, 2012 COMMISSION ORDER TO MODIFY LICENSES
WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION
(ORDER NUMBER EA-12-051)**

1. Introduction

Florida Power & Light Company's (FPL) Turkey Point Units 3 and 4 developed an Overall Integrated Plan (OIA) (Enclosure-Reference 1) documenting the modification with regard to reliable Spent Fuel Pool (SFP) instrumentation in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2. Milestone Accomplishments

Turkey Point has received the SFP level instruments that, when installed, will meet all the criteria designated in the Overall Integrated Plan submitted on February 26, 2013 (Reference 1). The equipment selected is being used throughout the NextEra fleet. The design modification package for Turkey Point Unit 3 installation is complete. It is projected that the design modification packages for Turkey Point Unit 4 package will be complete by March 2015.

3. Milestone Schedule Status

The Milestone Schedule below reflects latest schedule updates. Compliance with Attachment 2 of Order EA-12-051 to complete full implementation no later than the second refueling outage after submittal of the OIP is on target.

Milestones	Target Completion Date	Activity Status	Revised Target Completion Date
Commence Engineering and Design-Unit 3	1Q 2013	Complete	NA
Complete Engineering Design-Unit 3	4Q 2014	Complete	NA
Complete Procurement of SFP Instruments- Unit 3	4Q 2014	Complete	NA
Complete Installation of SFP Instruments- Unit 3	4Q 2015	Started	NA
Instruments Operational and Training – completed- Unit 3	4Q 2015	Started	NA
Commence Engineering and Design-Unit 4	1Q 2013	Complete	NA
Complete Design-Unit 4	3Q 2015	Started	
Complete Procurement of SFP Instruments - Unit 4	4Q 2015	Complete	NA
Complete Installation of SFP Instruments- Unit 4	2Q 2016	Started	NA
Instruments Operational and Training completed- Unit 4	2Q 2016	Started	NA

4. Changes to Compliance Method

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 1). Consistent with the requirements of Order EA-12-051 and the Order guidance documents, the six month reports will delineate any proposed changes to compliance methods.

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

FPL is not requesting relief from the requirements of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, (Enclosure-Reference 2) or guidance document JLD-ISG-2012-03 (Enclosure-Reference 4) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 2) and the guidance in NEI 12-02 (Reference 5), the six month reports will delineate progress made, any proposed changes in compliance methods, updates to the schedule, and if needed, requests for relief and their bases.

6. Requests for Additional Information

On November 19, 2013, FPL received NRC's Interim Staff Evaluation, which included a Request for Additional Information (RAI) (Enclosure-Reference 6). The NRC requested that FPL provides the response to RAIs in the e-portal. FPL notified the NRC that the responses to the RAIs will be posted to the e-portal by February 28, 2015.

The following table provides a status update on the response to the RAIs (Enclosure-Reference

RAI	Response Status
RAI – 1	To be provided to e-portal by 2/28/15
RAI – 2 a, b, c	To be provided to e-portal by 2/28/15
RAI – 3	To be provided to e-portal by 2/28/15
RAI – 4	To be provided to e-portal by 2/28/15
RAI – 5 a, b, c	To be provided to e-portal by 2/28/15
RAI – 6	To be provided to e-portal by 2/28/15
RAI – 7 a, b	To be provided to e-portal by 2/28/15
RAI – 8 a, b	To be provided to e-portal by 2/28/15
RAI – 9 a, b	To be provided to e-portal by 2/28/15
RAI – 10 a, b, c, d	To be provided to e-portal by 2/28/15
RAI – 11 a, b	To be provided to e-portal by 2/28/15
RAI – 12	Provided in FPL's letter L-2014-042
RAI – 13 a, b, c	Provided in FPL's letter L-2014-042

7. References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

- (1) FPL Letter L-2013-062, dated February 26, 2013, Florida Power & Light Company's Turkey Point Units 3 and 4, Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), Accession No. ML130720690.
- (2) U.S. Nuclear Regulatory Commission, Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately), dated March 12, 2012, Accession No. ML12056A044.
- (3) FPL Letter L-2013-248, Florida Power & Light Company's Turkey Point Units 3 and 4, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, Accession No. ML13248A313.
- (4) U.S. Nuclear Regulatory Commission, Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012, Accession No. ML12221A339.
- (5) NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" dated August, 2012, Accession No. ML12240A307.
- (6) NRC Letter to Florida Power and Light Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF0988 and MF0989) dated November 19, 2013, Accession No. ML13280A177.
- (7) FPL Letter L-2014-042, Florida Power & Light Company's Turkey Point Units 3 and 4, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to reliable Spent fuel Pool Instrumentation (Order Number EA-12-051), dated February 26, 2014.
- (8) U.S. Nuclear Regulatory Commission, "Nuclear Regulatory Commission Audits of Licensee Responses to Reliable Spent Fuel Pool Instrumentation Order EA-12-051", dated March 26, 2014.