



February 26, 2015
L-2015-017

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

Re: Turkey Point Unit 3 and Unit 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. U.S. Nuclear Regulatory Commission, Order Number EA-12-049, Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (ML12056A045)
2. FPL Letter, L-2013-061, Florida Power and Light Company's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2013 (ML13072A038)
3. FPL Letter, L-2013-249, Florida Power and 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 21, 2013 (ML13248A311)
4. NRC Letter, Turkey Point Units 3 and 4 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF0982 and MF0983), dated February 6, 2014 (ML14002A151)
5. FPL Letter, L-2014-041, Florida Power and 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2014 (ML14073A454)
6. FPL Letter, L-2014-243, Florida Power and 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 27, 2014 (ML14253A162)

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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 Units 3 and 4. In Reference 2, FPL submitted an Overall Integrated Plan for the implementation of this Order. The Order required Licensee's to provide periodic status reports for the Overall Integrated Plan.

FPL submitted the first six-month update to the Overall Integrated Plan on August 21, 2013 (Reference 3). On February 6, 2014, the NRC Staff provided the interim staff evaluation and audit report including open and confirmatory items (Reference 4). On February 26, 2014, FPL submitted the second six-month update to the Overall Integrated Plan (Reference 5). On August 27, 2014, FPL submitted the third six-month update to the Overall Integrated Plan (Reference 6).

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 an update of milestone accomplishments, confirmatory items and open items, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Turkey Point Licensing Manager, at 305-246-7327.

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

Executed on February ~~26~~²⁶, 2015.

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

Sincerely,



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-2015-017

Enclosure

Florida Power and Light Company's

Turkey Point Units 3 and 4

Fourth Six Month Status Report for the Implementation of Order EA-12-049

Order Modifying Licenses with Regard to Requirements for Mitigation

Strategies for Beyond-Design-Basis External Events

1 Introduction

Florida Power and Light Company's (FPL) Turkey Point developed an Overall Integrated Plan (OIP) (Reference 2 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 1. 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

Since the last 6 month update, progress has been made in performing the analysis supporting FLEX strategies which are currently on track for completion by the Milestone date shown below. Specifically, the RCS thermal hydraulic response (RETRAN-3D) during an ELAP and LUHS has been issued to FPL and the results support the core cooling mitigation strategies.

For Unit 3, detailed design of the mechanical and electrical tie-in modifications is complete. The design modifications for the Unit 3 RCP seal replacement are complete. Implementation of most of the Unit 3 modifications has started and it will be completed on-line. The remaining of the Unit 3 modifications are on track for implementation during the upcoming Unit 3 2015 Fall Refueling Outage.

For Unit 4, the design modification packages are on target with the final modification for the RCP seal replacement forecasted for completion by June, 2015. The detailed design for the Unit 4 electrical tie-in modifications is complete and the detailed designs of the mechanical tie-ins are nearly complete.

The construction of the FLEX storage building is well underway.

Additionally, the following activities have started, and some have advanced with substantial progress: Development of the staffing analysis, ordering of equipment (procurement phases 2 and 3), procedures, and training plan.

3 Milestone Schedule Status

The following Table provides an update to Attachment 3 of the Overall Integrated Plan (Reference 1). It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Accordingly, the target completion dates have been adjusted to address procedure development and validation, scheduler completion of the FLEX building and related milestones regarding training plan and ordering equipment. These revised milestone target completion dates do not impact Turkey Point's ability to meet the final compliance date for NRC Order EA-12-049 implementation and are expected to support the NRC audit currently scheduled for August 18, 2015.

New Milestones:

- There are no new milestones.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan	Feb 2013	Complete	N/A
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	N/A
Update 2	Feb 2014	Complete	N/A
Update 3	Aug 2014	Complete	N/A
Update 4	Feb 2015	Complete	N/A
Update 5	Aug 2015	Not Started	N/A
Update 6	Feb 2016	Not Started	N/A
Update 7	Aug 2016	Not Started	N/A
Walk-through or Demonstrations:			
Complete Analyses Supporting FLEX Strategies	Jan-2015	Started	Apr-2015
Complete Final Time Constraint Validations	Mar-2015	Started	May-2015
Complete Staffing Analysis (Phase 2)	Jun-2015	Started	N/A
Complete Final Walkthrough Validation	April-2015	Not Started	Aug-2015
Modifications:			
Issue Modification Packages for Unit 3	Mar-2015	Started	N/A
Unit 3 Implementation Complete	Nov-2015	Started	N/A
Issue Modification Packages for Unit 4	Jun-2015	Started	N/A
Unit 4 Implementation Complete	May-2016	Started	N/A
Storage:			
FLEX Storage Building Completed	Mar-2015	Started	May 2015
FLEX Equipment:			
Order Equipment (procurement phase 1)*	Jun-2014	Complete	N/A
Receive Equipment (procurement phase 1)*	Feb-2015	Started	N/A
Order Equipment (procurement phases 2/3)*	Dec-2014	Started	March 2015
Receive Equipment (procurement phase 2)*	June-2015	Started	N/A
Receive Equipment (procurement phase 3)*	June-2015	Not Started	July 2015
Develop Strategies (Site Response Plan) with the National Safer Response Center (NSRC) throughout	Jan-2015	Started	Jul 2015

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Procedures:			
Issue Operations Procedure Changes including FSGs	Jun-2015	Started	Nov-2015
Create Maintenance Procedures	Jun-2015	Started	N/A
Training:			
Operations Procedure Changes Training Material Complete	Feb-2015	Started	May-2015
Develop Training Plan	Mar-2015	Started	April 2015
Training Complete	Jun-2015	Started	Oct-2015

*Note phase refers to the procurement sequence of equipment to be ordered, not the FLEX Phases as described in NEI 12-06.

4 Changes to Compliance Method

4.1 Changes to Modifications

Modification No. 13, FLEX Portable Diesel Generator to Repower Vital 120 VAC Panels to Reduce Loading on Station Batteries.

The battery backup portion of this modification was planned to provide the capability to obtain indications of the Essential Monitoring Instrumentation during an event using small AC and or DC power sources within the Emergency Operating Procedures and FLEX Support Guidelines in order to comply with NEI 12-06 requirement 3.2.1.10. However, subsequent benchmarking and industry experience have determined that this approach, to install a number of small UPS units in the control room is not viable.

This modification is being implemented to conserve battery capacity in severe hurricane events, where environmental conditions could potentially delay installation of 480 VAC temporary generators and their connection to the vital ac load centers.

The modification will install new receptacles on the secondary windings of Vital AC Constant Voltage Transformers (CVTs) that can be used to locally power the vital AC panels. These receptacles will be the connection point for small diesel driven portable generators. The EOP and FSG procedures provide the procedural controls for the connection of the portable generators to the receptacles mounted in the CVT cabinets.

4.2 Changes to Strategies

4.2.1 Current Strategy for Time Critical Actions (OIP Section Page 5 of 101)

OIP Section: Provide a sequence of events and identify any time constraint required for success including the technical basis for the time constraint.

Time Critical Actions:

T+1 (hour) – Operating Crew Completes Deep Load Shedding (page 6 of 101)

“The operating crew completes deep load shedding once the ELAP is declared and before 1 hour has elapsed after the event. By completing the deep load shedding in 1 hour, run time on the batteries of 15.9 hours will be available providing sufficient time to install portable diesel generators (Ref 29). Procedural guidance will be provided on the time critical nature of this activity and the loads to be shed.”

Change to the Strategy for Deep Load Shedding

There are two scenarios that affect the response to an ELAP event at Turkey Point. The first is an ELAP event that occurs while the units are operating at power. The second scenario is the response to a category 4 or higher hurricane.

In both cases there will be a deep load shed activity that will commence within approximately 30 minutes of the initiation of an ELAP event, and be completed within 90 minutes of the ELAP initiation. In the first event, an alternate means of powering the vital 120Vac panels will not be initiated as the installation of temporary diesel generators to power the 480Vac vital load centers will be completed in T+8 hours. In the second case, for severe hurricanes (category 4 or 5), there will be advance notice prior to the onset of a hurricane. Pre-staging of temporary diesel generators in sheltered locations to provide 120 Vac power to Vital AC panels will be completed. This pre-staging does not include connection of temporary diesels, only placing of diesels and cables in needed locations. If an ELAP condition occurs the temporary cables will be connected and the temporary diesels will start to carry the Vital AC panel load that has been reduced through the deep load shed activity at approximately T+1.5 hours. Specific times will be provided in the next six month update. These generators (1 per unit) will be used to power the vital 120VAC panels as an intermediate coping strategy for recovery from the hurricane event timeline. Use of this power source is only required until the 480Vac portable diesel generators (PDGs) are available for deployment following the extended wind condition. Use of the temporary diesel generators is an interim activity that is considered to be an enhancement to the existing coping strategies for repowering of the vital DC loads during a hurricane event.

4.3 Clarification to Strategies

OIP Section: Safety Functions Support, Portable Equipment Phase 2, Identify Modifications (page: 62 of 101)

The following represents clarifications to Turkey Point’s FLEX coping strategy for Maintain Core Cooling and Heat Removal Phase 2 (OIP pages 21-22) and Portable Equipment Phase 2 (OIP pages 61 – 62). The Phase 2 coping strategy following an ELAP and LUHS event continues to rely on the use of 480 VAC portable diesel generators (PDGs) to power select electrical loads; including station battery chargers. Part of this strategy includes installation of receptacles (via Modification 13) for repowering the vital 120Vac panels. As discussed in the Enclosure to Reference 1, the coping strategy for maintaining core cooling and heat removal varies depending upon whether or not the precipitating event is a hurricane. During a hurricane event a high wind condition may exist for an extended period of time and prevent deployment of 480VAC PDGs within the 8 hours assumed in the base (non-hurricane scenario) timeline. To

facilitate coping with severe hurricane conditions (Category 4 or higher) [consistent with NEI 12-06 paragraph 3.2.1.7] separate, temporary diesel generators and cabling will be pre-staged in a location protected from the hurricane specific external conditions.

The coping strategy for a hurricane induced ELAP and LUHS event (as discussed in the Enclosure to Reference 1 and plant procedures) is:

1. Shutdown the reactor and cooldown to modes 3, 4 or 5 (specific mode depends on the projected strength of the hurricane) at least 2 hours prior to the onset of projected hurricane force winds on site. Remain in this condition until it is safe to return to power and reliable off-site power to the site has been restored
2. fill both CSTs to maximum level (prior to the onset of projected hurricane force winds on site)
3. lock in the steam supply for the AFW FCVs (prior to the onset of projected hurricane force winds on site)
4. Stage small PDGs and cabling for powering the 120VAC power panels for severe hurricane storms, with the intention to connect and operate, if, an ELAP condition were to occur.

After landfall and high winds have subsided sufficiently to allow full plant access:

1. manually operate the AFW FCVs as necessary
2. establish CST makeup from the well
3. establish a secondary SG injection path
4. power the 480 V load centers with the PDG (this action was not previously noted in the Reference 1 Enclosure)
5. remove vital ac panel loads from the small diesel generators and restore the vital ac portion of the vital dc system to normal alignment

As noted above, the RCS will be cooled down to Modes 3, 4 or 5 (depending on the projected hurricane strength) a minimum of 2 hours prior to hurricane force winds reaching the plant site. Under this condition the inventory of a single CST will be sufficient to cope with an ELAP/LUHS event for approximately 24 hours, by which time AC power, CST makeup, secondary SG makeup, RCS makeup and SFP makeup will have been established. The hurricane specific timetable has also been supported by the results of the RCS thermal hydraulic response (RETRAN-3D) developed specifically for Turkey Point.

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

Florida Power & Light Company has requested an order relaxation for compliance on Unit 3 to coincide with the compliance date for Unit 4. Physical modifications will still be completed as previously planned. This relaxation for compliance with Order EA-12-049 requirements has been requested due to the significant unit interdependency of shared plant systems and the fact that low leakage RCP seals have not yet been installed on unit 4. During the interim period, reactor coolant pump seals will not have been replaced on unit 4, which would complicate the cooldown requirements and event mitigation philosophy on both units. There is no impact on meeting the final compliance date for both units.

6 Pending Actions from Overall Integrated Plan and NRC Interim Staff Evaluation Open Items

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the draft Safety Evaluation (SE) and the status of each item. Resolution of these items will not affect the schedule for completing implementation of the Order's requirements.

No.	Overall Integrated Plan Open Item (Pending Actions)	Target Completion Date	Status
1	Perform a revised analysis of the containment structure once the detailed performance parameters for the shutdown seals are obtained and using more realistic heat input parameters.	Apr 2015	Being tracked as NRC Confirmatory Item 3.2.1.6.A
2	A hydraulic analysis will be performed to determine the minimum requirements of the portable FLEX pumps and connection point sizes. The outputs of this analysis will include a minimum flow and discharge pressure for each pump.	Apr 2015	Being tracked as NRC Confirmatory Item 3.2.1.9.B
3	A hydraulic analysis will be performed to support the ability to heat up from Mode 5 to a condition where the AFW pumps are removing decay heat via the SGs.	April 2015	Started
4	Heat loads will be removed via the SFP Cooling heat exchangers, RHR heat exchangers, and Containment Coolers. Analysis will be required to determine the minimum requirements for UHS NSRC pump.	January 2015	Complete
5	Analysis will be required to determine fuel requirements of FLEX equipment. This analysis will determine requirements and capabilities of onsite FLEX portable pumps and diesel generators for Phase 2.	Apr 2015	Being tracked as NRC Confirmatory Item 3.2.4.9.A
6	A determination of the "drop off" location from the NSRC is pending. Once selected, the path to the site will be reviewed.	May 2015	Being tracked as NRC Confirmatory Item 3.1.1.4.A
7	An analysis will be performed to establish the timeline for SI or RWST injection for Modes 5 & 6	May /2015	Started
8	Complete a final assessment of haul paths and staging areas to confirm access including review for soil liquefaction	April 2015	Started
9	Generic WCAP guidance recommends that a site-specific evaluation be performed once the seal design is completed to validate that the cooldown and depressurization time is supported.	April 2015	Being tracked as NRC Confirmatory Item 3.2.1.B

NRC Interim Staff Evaluation Open Item	Status
<p>3.2.1.8.A- Core Sub-Criticality - Confirm that Turkey Point will apply the generic resolution for boron mixing under natural circulation conditions potentially involving two-phase flow, in accordance with the PWROG position paper, dated August 15, 2013, and subject to the conditions provided in the NRC endorsement letter dated January 8, 2014. Alternatively, justify the boric acid mixing assumptions that will ensure adequate shutdown margin exists through all 3 phases of an ELAP event.</p>	<p>Closed per the status provided in the 2nd six-month update (Reference 8). The status provided confirms Turkey Point will apply PWROG position paper on boron mixing, including the NRC additional considerations.</p> <p>Therefore the alternative approach of justifying the boric acid mixing assumptions is no longer applicable.</p>
<p>3.2.1.9. A- The Turkey Point RCS inventory coping strategy involves an approach that relies on repowering one of three installed charging pumps in each unit from multiple power connection points using one of the two 100% capacity, portable 480 VAC FLEX diesel generators. Verify that these installed pumps will be capable of performing their mitigating strategies function following an undefined ELAP event, in contrast to using a portable FLEX pump.</p>	<p>Based on NRC comments received regarding Attachment 6 of the 2nd six-month update, Turkey Point has verified and documented compliance in a white paper titled "Turkey Point FLEX Open Item Paper" that is available through the NRC streamlined process of the audit review.</p>
<p>3.2.4.7.A- The licensee relies on separation and redundancy of the RWSTs to show that at least one will survive a high wind event with wind-driven missiles. Verify that the RWSTs are sufficiently robust and that sufficient separation exists between the tanks to support the determination that at least one tank will be available as a water source following a high wind event, as credited in the Turkey Point mitigating strategies.</p>	<p>Based on NRC comments received regarding Attachment 7 of the 2nd six-month update, Turkey Point has documented compliance in a white paper titled "Turkey Point FLEX Open Item Paper" that is available through the NRC streamlined process of the audit review.</p>

7 Potential Draft Safety Evaluation Impacts

See FPL response to open items in Section 8.

8 Interim Staff Evaluation Confirmatory Items

Confirmatory Item 3.1.1.3.A:

Confirm that the large internal flooding sources that are not seismically robust will not impact the implementation of the mitigating strategies during an ELAP event.

Response:

In Progress – The components required to implement the mitigating strategies during an ELAP event have been identified. The component locations and the travel paths associated with the mitigating strategies have also been identified. A detailed analysis is being performed to determine if the components or travel paths will be adversely affected by an internal flooding event. The results of this analysis will be included in the FLEX basis documents scheduled for completion May 2015.

Confirmatory Item 3.1.1.4.A:

Off-Site Resources -Confirm the location of the local staging area for the NSRC equipment, and that access routes to the site, the method of transportation, and the drop off area have been properly evaluated for all applicable hazards.

Response:

In Progress- An on-site meeting was held with SAFER in December 2014. The proposed local drop off area, access to the site and method of transportation are being evaluated by NSRC, as part of the NSRC Site Response Plan. This item is scheduled for completion May 2015.

Confirmatory Item 3.2.1.A:

Confirm recalculation of the boration requirements for the Phase 2 RCS cooldown to provide additional margin and flexibility for the boration activity.

Response:

In Progress- A new calculation has been prepared that addresses the boration requirements for Phase 2 RCS cooldown. This calculation will be approved and issued as part of the FLEX basis documents scheduled for completion April 2015.

Confirmatory Item 3.2.1.B:

Confirm the analysis used to validate the RCS cooldown and depressurization timeline once the RCP low-leakage seal design is completed.

Response:

In Progress- An analysis is being prepared that is based on the applicable RCP low-leakage seal design. The analysis is scheduled for completion in April 2015.

Confirmatory Item 3.2.1.1.A:

Reliance on the NOTRUMP code for the ELAP analysis of Westinghouse plants is limited to the flow conditions before reflux condensation initiates. This includes specifying an acceptable definition for reflux condensation cooling. Confirm that Turkey Point has properly applied these conditions for the ELAP analysis.

Response:

In Progress- RETRAN has been selected as the code and methodology for performing the RCS cooldown analysis during reflux conditions. The RETRAN methodology is already under NRC review for applicability to STP. The Turkey Point analysis will be consistent with the NRC acceptance of the STP methodology for the RCS cooldown analysis.

Confirmatory Item 3.2.1.1.B:

Confirm recalculation of the SG pressure setpoint to prevent injection of nitrogen from the accumulators using the guidance in the PWROG position paper.

Response:

Completed- This calculation has been finalized,

Confirmatory Item 3.2.1.2.A:

Confirm that the RCP seal leakage rate of one gpm/seal for the FlowServe safe shutdown/low leakage seals used in the ELAP analysis is adequately justified, including the computer code/methodology and assumptions used, and the supporting test data applied, when the site specific evaluation is performed.

Response:

In Progress-FLOWSERVE submitted a white paper on this item to the NRC. Additional comments provided by the NRC are currently under review by FLOWSERVE. An update that specifically addresses the application of these seals to Turkey Point will be provided in the six-month update report when the review is complete.

Confirmatory Item 3.2.1.5.A:

Confirm that the instrumentation used to measure the listed parameters and the associated setpoints, credited in the ELAP analysis for automatic actuations and indications required for the operator to take appropriate actions, is reliable and accurate in the containment harsh conditions resulting from an ELAP event.

Response:

As noted in the third 6 month update, (Reference 9), containment wide range pressure transmitters do not have full EQ requirements and do not require EQ qualification. These transmitters are located outside of containment in a mild environment and will read containment pressures up to 180 psig. Our calculations determined that containment pressure will not exceed 19 psig. The location of the transmitters will not exceed 105 degrees F.

Clarification Note: In Attachment 6, Figure 1 of the OIP, it was stated that the Safety Injection Accumulators have wide range level transmitters. However, it is determined that the level transmitters are scaled for a narrow range for providing a more precise monitoring for Technical Specification compliance. These transmitters are not EQ qualified and are not used in any of the mitigation strategies.

Confirmatory Item 3.2.1.6.A:

Confirm that the revised Modular Accident Analysis Program containment analysis supports the revised strategy for maintaining containment (reliance on containment venting instead of containment spray), and also confirm that the Sequence of Events timeline is properly revised and any impacts of the changes are appropriately addressed.

Response:

The response provided in the second 6 month update is unchanged. Once the analysis is completed, the time line will be updated and reported in the next 6 month update.

Confirmatory Item 3.2.1.9.B:

Confirm completion of the licensee's final engineering designs and supporting analyses for portable equipment that directly performs a FLEX mitigation strategy.

Response:

A majority of the designs have been completed; however there are a several modifications that are still in process. This completion date has been changed to June 2015 for the last modification which is for the Unit 4 RCP seal replacement.

Confirmatory Item 3.2.4.1.A:

Confirm that the charging pumps have adequate cooling following an ELAP event (i.e., through intermittent operation, or by providing cooling to the fluid drive heat exchanger).

Response:

Charging pump cooling has been determined to be sufficient by providing deep well water to the fluid drive heat exchanger. This activity has been completed.

Confirmatory Item 3.2.4.4.A:

The NRC staff has reviewed the licensee communications assessment (ADAMS Accession Nos. ML 12300A425 and ML 13064A359) and has determined that the assessment is reasonable (ADAMS Accession No. ML13149A382). Confirm that upgrades to the site's communications systems have been completed.

Response:

The design change package for providing backup power to the phone system has been revised and has been completed. This completion date for full implementation still remains at June 2015.

Note: the Communication Assessment which was submitted under FPL letter L-2012-388 (ML12300A425) identified the use of the Spectralink wireless handsets as a primary onsite communication system. FPL letter L-2015-010 indicated that the Spectralink wireless system does not provide the service intended so an update was submitted to remove this system from the communications plan. Sufficient communication systems are available without this system to execute the FLEX strategies effectively.

Confirmatory Item 3.2.4.9.A:

Confirm completion of the refueling plan for portable FLEX equipment and sizing of the refueling trailer.

Response:

This response is unchanged from the third six month report. The refueling plan has been completed and will be approved/issued as part of the FLEX basis documents scheduled for completion May 2015. The plan's strategy calls for the use of an onsite diesel fuel oil refueling trailer to transfer fuel from the Unit 4 Diesel Oil Storage Tank to those components that require diesel fuel oil to operate.

Confirmatory Item 3.4.A:

Confirm that NEI 12-06, Section 12.2 guidelines 2 through 10 regarding offsite resources have been adequately addressed.

Response:

FPL has conducted an onsite meeting with the NSRC representatives in December 2014. Evaluation of the proposed drop site and the submittal of the Site Response Plan and checklist are being coordinated with the SAFER team. The completion date for this activity is forecasted for May 2015.

9 References

1. NRC Order Number EA-12-049, "Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012, ADAMS Accession No. ML12056A045
2. FPL Letter, L-2013-061, Florida Power and Light Company's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 26, 2013, ADAMS Accession No. ML13072A038
3. FPL Letter, L-2013-249, Florida Power and 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) , dated August 21, 2013, ADAMS Accession No. ML13248A311
4. Westinghouse Letter, LTR-FSE-13-46, Rev. 0, Westinghouse Response to NRC Generic Request for Additional Information (RAI) on Boron Mixing in Support of the Pressurized Water Reactor Owners Group (PWROG), Dated August 15, 2013, Proprietary ADAMS Accession No ML13235A135
5. NRC Letter from Jack Davis, Director, Mitigating Strategies Directorate Office of Nuclear Reactor Regulation to Mr. Jack Stringfellow, Pressurized Water Reactors Owners Group, dated January 8, 2014, ADAMS Accession No. ML13276A183
6. NRC Letter, Turkey Point, Units 3 And 4 -Interim Staff Evaluation Relating To Overall Integrated Plan In Response To Order Ea-12-049 (Mitigation Strategies) (TAC NOS. MF0982 AND MF0983), dated February 6. 2014, ADAMS Accession No. ML14002A160
7. FPL Letter, L-2013-087, Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flood Hazard Reevaluation of Recommendation 2.1, dated March 11, 2013, ADAMS Accession No. ML13095A196
8. FPL Letter, L-2014-041, Florida Power and 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2014, ADAMS Accession No. ML14073A454.
9. FPL Letter, L-2014-243, Florida Power and 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 Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 27, 2014, ADAMS Accession No. ML14253A162.
10. FPL Letter L-2015-010, Florida Power and Light Company's Turkey Point Units 3 and 4, Supplemental Information Regarding L-2014-199 "Response to NRC 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness" Commitment Revisions

10 Attachments

None.