



August 11, 2015  
L-2015-194

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, Fifth 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, ADAMS Accession No. ML12056A044.
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, ADAMS Accession No. 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, ADAMS Accession No. ML13248A313.

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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, ADAMS 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, ADAMS 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, ADAMS Accession No. ML14245A057.
10. FPL Letter L-2015-018, Florida Power & 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), dated February 13, 2015, ADAMS Accession No. ML15075A023.

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 the Overall Integrated Plan for the implementation of this Order.

On July 11, 2013, the NRC issued a request for additional information (RAI) (Reference 3). FPL responded to the request providing supplemental information by FPL letter L-2013-225 dated July 30, 2013 (Reference 4). FPL submitted the first six-month status report by FPL letter L-2013-248, on August 21, 2013 (Reference 5).

On November 19, 2013, the NRC issued the Interim Staff Evaluation (Reference 6), which included additional RAIs. FPL provided the second six-month status report by FPL letter L-2014-042, dated February 26, 2014 and the response to RAIs 12 and 13 (Reference 7). On March 26, 2014, the NRC issued an audit plan to review Licensee submittals (Reference 8) to synchronize 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. The responses to the RAIs were placed on the e-portal in accordance with the audit review streamlined process. The third and fourth six-month status reports were submitted to NRC by FPL letters L-2014-244, and L-2015-018, dated August 15, 2014 and February 13, 2015, respectively (References 9 and 10).

The purpose of this letter is to provide the fifth six-month status report pursuant to Section IV, Condition C.2 of Reference 1, which delineates progress made in implementing the requirements of Reference 1. The enclosure to this letter provides an update since the fourth six-month status report of milestone accomplishments, changes to the compliance method, schedule, and 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 305-246-6698.

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

Executed on August 11, 2015.

This letter contains no new regulatory commitments and no revisions to existing regulatory commitments.

Sincerely,



Thomas Summers (Acting)

Thomas Summers  
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-2015-194**

**ENCLOSURE**

**FLORIDA POWER & LIGHT COMPANY'S  
TURKEY POINT UNITS 3 AND 4  
FIFTH 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)**

**1. Introduction**

Florida Power & Light Company's (FPL) Turkey Point Units 3 and 4 developed an Overall Integrated Plan (OIP) (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 fourth six-month status report (Reference 3), including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2. Milestone Accomplishments**

Turkey Point has selected and entered into a purchase agreement to procure SFP level instruments that, when installed, will meet all the criteria designated in the OIP submitted on February 26, 2013 (Reference 1). The equipment selected is being used throughout the NextEra fleet. The modification packages for both Turkey Point Unit 3 and Unit 4 installations are complete. Completion of the installations is on track per the schedule below.

**3. Milestone Schedule Status**

The Milestone Schedule initially provided in the OIP is unchanged. There is no impact in achieving 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. Please note that the Unit 3 Refueling Outage is scheduled for the fourth quarter of 2015 and the Unit 4 Refueling Outage milestone is set for the second quarter of 2016. The updated milestone target completion dates are as follows:

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	3Q 2014	Complete	N/A
Complete Procurement of SFP Instruments- Unit 3	4Q 2014	Complete	N/A
Complete Installation of SFP Instruments-Unit 3	4Q 2015	Started	N/A
Instruments Operational and Training - Unit 3	4Q 2015	Instrument Operational Started; Training completed	N/A
Commence Engineering and Design-Unit 4	1Q 2013	Complete	NA
Complete Design-Unit 4	3Q 2015	Complete	NA
Complete Procurement of SFP Instruments - Unit 4	4Q 2015	Complete	NA
Complete Installation of SFP Instruments- Unit 4	2Q 2016	Started	N/A
Instruments Operational and Training completed- Unit 4	2Q 2016	Instrument Operational Started; Training completed	N/A

**4. Changes to Compliance Method**

Currently, there are no changes to the compliance method documented in the OIP. 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 or the Order guidance document JLD-ISG-2012-03 (Reference 4) at this time.

Consistent with the requirements of Order EA-12-051 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**

An Interim Staff Evaluation (ISE) with Request for Additional Information (RAI) was received on November 19, 2013 (Reference 6). FPL responses to the RAIs were posted to the e-portal on February 2015.

The installation of the instrument sensors on both Unit 3 and Unit 4 required revision to fully encompass the normal and high SFP operating levels. This physical mounting change required a change to the elevation of the instrument and lengthening the level sensor cable. As a result, several drawings and calculations require revision. These revisions affect some of the RAI responses. These affected RAIs are noted in the table below. The changes in the SFP level sensor does not affect the ability to monitor the SFP at the prescribed levels, nor does it affect meeting the installation commitment dates for both units.

The following table provides a summary of the status of FPL responses to the RAIs received on November 19, 2013 (Reference 6).

<b>RAI</b>	<b>Status</b>
RAI – 1	February 2015 response requires revision to address drawing changes for bracket redesign.
RAI – 2 a, b, c	February 2015 response requires resubmittal to address the revision of two calculations
RAI – 3	February 2015 response requires resubmittal to address the revision of one calculations
RAI – 4	February 2015 response requires resubmittal to address the revision of one calculation
RAI – 5 a, b, c	Submitted February 27, 2015 to the e-portal
RAI – 6	Submitted February 27, 2015 to the e-portal
RAI – 7 a, b	Submitted February 27, 2015 to the e-portal
RAI – 8 a, b	Submitted February 27, 2015 to the e-portal
RAI – 9 a, b	Submitted February 27, 2015 to the e-portal
RAI – 10 a, b, c, d	Submitted February 27, 2015 to the e-portal
RAI – 11 a, b	Submitted February 27, 2015 to the e-portal
RAI – 12	Response provided in L-2014-042
RAI – 13 a, b, c	Response provided in L-2014-042

Revised responses for the RAIs affected by the change described above will be uploaded to the NRC e-portal, consistent with the audit base review process (Reference 7) by the end of August 2015.

## 7. References

The following references support the updates to the IOP 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 Modifying 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-2015-018, Florida Power & 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), dated February 13, 2015, ADAMS Accession No. ML15075A023.
- (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) 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.