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Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420

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Ms. Annette Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff

January 18, 2002 (9:37AM)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: Florida Power & Light Company Comments
NEI Petition for Rulemaking - Early Site Permits and Combined Licenses
66 Fed. Reg. 48832 (September 24, 2001)

Dear Ms. Vietti-Cook:

Florida Power & Light Company (FPL), the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, hereby submits the following comments in support of the above-referenced Petition for Rulemaking submitted by the Nuclear Energy Institute (NEI).

FPL expects that existing power reactor licensees will order new reactors in the future and that these new reactors will use many of the programs currently in place at existing reactor sites. FPL also anticipates that these new reactors would be located on existing reactor sites within their respective owner controlled areas. FPL supports the premise of the NEI petition that 10 CFR Part 52 should be revised to permit the incorporation by reference of valid, existing information concerning the site characterization and/or operational programs into new early site permitting or combined operating license applications, thereby avoiding unnecessary and duplicative NRC review of such information.

Key factors that will affect whether new nuclear plants will be ordered are the time it takes to bring a new plant to market and the cost and schedule estimates. Essential to achieving efficiencies are effective and efficient processes for plant licensing, construction, and start-up that minimize the potential for costly, unwarranted delays in bringing new plants on line. Granting the NEI petition would help to achieve these goals while continuing to provide an opportunity to account for changed circumstances, such as new regulations and significant new information.

A successful example of a similar approach is the license renewal process. FPL notes that the scope of issues appropriate for review in operating license renewal proceedings is limited under 10 CFR Parts 51 and 54 in that matters previously considered in prior licensing proceedings or rulemaking actions are eliminated from review. As with license renewal, early site permitting and combined licensing would be more focused and efficient with the proposed revisions, conserving both licensee and NRC resources.

The proposed regulations would promote standardization of programs and procedures and a more consistent licensing basis for all units at a site. FPL believes that the resolution of this petition should be integrated with the upcoming notice of proposed rulemaking on Part 52.

We appreciate the opportunity to comment on NEI's petition for rulemaking.

Sincerely yours,

J. A. Stall
Senior Vice President, Nuclear
and Chief Nuclear Officer

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