



L-2013-023
10 CFR 52.3

January 16, 2013

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

Re: Florida Power & Light Company
Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
Response to NRC Request for Additional Information Letter No. 069
(eRAI 6918) - SRP Section 11.05 – Process & Effluent Radiological Monitoring
Instrumentation and Sampling Systems

Reference:

1. NRC Letter to FPL dated December 5, 2012, Request for Additional Information Letter No. 069 Related to SRP Section: 11.05 – Process & Effluent Radiological Monitoring Instrumentation and Sampling Systems for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application

Florida Power & Light Company (FPL) provides, as attachment to this letter, its response to the Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI) 11.05-1 provided in Reference 1. The attachment identifies changes that will be made in a future revision of the Turkey Point Units 6 and 7 Combined License Application (if applicable).

If you have any questions, or need additional information, please contact me at 561-691-7490.

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

Executed on January 16, 2013

Sincerely,

A handwritten signature in blue ink, appearing to read 'William Maher', is written over a horizontal line.

William Maher
Senior Licensing Director – New Nuclear Projects
WDM/RFO

DO97
NR0

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Attachment: FPL Response to NRC RAI No. 11.05-1 (eRAI 6918)

cc:

PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO
Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Units 3 & 4

NRC RAI Letter No. PTN-RAI-LTR-069 Dated December 5, 2012

**SRP Section: 11.05 – Process and Effluent Radiological Monitoring
Instrumentation and Sampling Systems**

NRC RAI Number: 11.05-1 (eRAI 6918)

FSAR Tier 2, Rev. 3, Section 11.5.8 endorses the use of NEI ODCM Template 07-09A (Revision 0, March 2009) to meet COL Information Item 11.5-1 until a plant and site-specific ODCM is prepared, before fuel load, under the requirements of a license condition described in FSAR Section 13.4, Table 13.4-201, Item 9. The development of the site specific ODCM and implementing procedures should meet the provisions of GL 89-01 (Supplement No. 1), Radiological Assessment Branch Technical Position (Revision 1, November 1979) included as Appendix A in NUREG-1301, as ODCM guidance for PWRs, and the guidance of NUREG- 0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and NUREG-0543, "Methods for Demonstrating LWR Compliance with the EPA Uranium Fuel Cycle Standard (40 CFR Part 190)."

However, FSAR Tier 2, Rev. 3, Section 11.5.8 does not address unique site-specific conditions that are not covered in the NEI ODCM Template 07-09A. The FSAR does not consider how the ODCM will control gaseous effluent releases and doses to members of the public given that Turkey Point 3&4 and Turkey Point 6&7 will be contributing to and sharing a single dose allocation to members of the public under 10 CFR 20.1301 and 20.1302; 10 CFR 20.1301(e) in complying with 40 CFR Part 190; and the unity-rule in meeting liquid and gaseous effluent concentration limits of 10 CFR Part 20 (Appendix B, Table 2, Columns 1 and 2). NUREG-0543 addresses compliance issues for sites with multiple reactor units when considering all sources of radiation exposures, including doses due to liquid and gaseous effluent releases and contributions from external radiation from buildings and staging areas containing radioactive materials and wastes.

Accordingly, the applicant is requested to describe in FSAR Tier 2, Section 11.5.8 the administrative program and procedures that will be used to coordinate all liquid and gaseous effluent releases and dose allocations to members of the public between Turkey Point 3&4 and Turkey Point 6&7 in complying with NRC regulations, as noted above.

FPL RESPONSE:

Formal administrative controls will be implemented by the licensees of Turkey Point Units 6 & 7 and Turkey Point Units 3 & 4 coordinating their direct radiation contributions and liquid and gaseous effluent release concentrations so that applicable site allocated dose and dose rate limits (10 CFR 20 and 40 CFR 190) are not exceeded. These administrative controls will be incorporated into each licensee's procedures controlling direct radiation and effluent releases for normal operations and anticipated operational

occurrences. The administrative controls and coordination process will be described in the ODCM.

This response is PLANT SPECIFIC.

References:

None.

ASSOCIATED COLA REVISIONS:

The following paragraph will be added to FSAR Subsection 11.5.8 with an LMA of PTN COL 11.5-1.

11.5.8 COMBINED LICENSE INFORMATION

An Offsite Dose Calculation Manual (ODCM) is developed and implemented in accordance with the recommendations and guidance of NEI 07-09A (Reference 202). The ODCM contains the methodology and parameters used for calculating doses resulting from liquid and gaseous effluents. The ODCM addresses operational setpoints, including planned discharge rates, for radiation monitors and monitoring programs (process and effluent monitoring and environmental monitoring) for the control and assessment of the release of radioactive material to the environment. The ODCM provides the limitations on operation of the radwaste systems, including functional capability of monitoring instruments, concentrations of effluents, sampling, analysis, 10 CFR Part 50, Appendix I dose and dose commitments, and reporting. The ODCM will be finalized prior to fuel load with site-specific information.

Table 13.4-201 provides milestones for ODCM implementation.

Formal administrative controls will be implemented by the licensees of Turkey Point Units 6 & 7 and Turkey Point Units 3 & 4 coordinating their direct radiation contributions and liquid and gaseous effluent release concentrations so that applicable site allocated dose and dose rate limits (10 CFR 20 and 40 CFR 190) are not exceeded. These administrative controls will be incorporated into each licensee's procedures controlling direct radiation and effluent releases for normal operations and anticipated operational occurrences. The administrative controls and coordination process will be described in the ODCM.

ASSOCIATED ENCLOSURES:

None