

## **PMTurkeyCOLPEm Resource**

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**From:** CHILDRESS, ELWOOD [ELWOOD.CHILDRESS@fpl.com]  
**Sent:** Tuesday, February 12, 2013 3:09 PM  
**To:** Williamson, Alicia; Matthews, David; Maher, William; Comar, Manny; Hoeg, Tim; McCree, Victor  
**Subject:** L-2013-055 RAI Ltr 68 eRAI 6916 Response\_9.2.4-3- Potable & Sanitary Water  
**Attachments:** 055\_L-2013-055 Signed 02-12-2013 RAI Ltr 68 eRAI 6916 Response\_9.2.4-3.pdf

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. 68  
(eRAI 6916) - Related to SRP Section 09.02.04 Potable and Sanitary Water Systems

### References:

1. NRC Letter to FPL dated December 4, 2012, Request for Additional Information Letter No. 068 Related to SRP Section 09.02.04 Potable and Sanitary Water Systems for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application
2. FPL Letter to NRC dated January 10, 2013, Schedule for Response to NRC Request for Additional Information Letter No. 68 (eRAI 6916) - Related to SRP Section 09.02.04 Potable and Sanitary Water Systems

Florida Power & Light Company (FPL) provides, as an attachment to this letter, its response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) 09.02.04-3 provided in the referenced letter. 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). Reference 2 provided a schedule for the response.

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**From:** CHILDRESS, ELWOOD

**Created By:** ELWOOD.CHILDRESS@fpl.com

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Tracking Status: None  
"Hoeg, Tim" <Tim.Hoeg@nrc.gov>  
Tracking Status: None  
"McCree, Victor" <Victor.McCree@nrc.gov>  
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L-2013-055  
10 CFR 52.3

February 12, 2013

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Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
L-2013-047 Page 2

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 February 12, 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/ETC

Attachment: FPL Response to NRC RAI No. 01.05-1 (eRAI 6434)

cc:

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

**NRC RAI Letter No. PTN-RAI-LTR-068 Dated December 04, 2012**

**SRP Section: 09.02.04 – Potable and Sanitary Water Systems**

Question from Potable and Sanitary Water Systems

**NRC RAI Number: 09.02.04-3 (eRAI 6916)**

FSAR Tier 2, Rev. 3, Section 9.2.5 presents supplemental information on the source of potable water that will be used to service all plant facilities. AP1000 DCD FSAR, Tier 2, Rev. 19, Section 9.2.5.3 provides information on the potable water supply system and one feature that is used to prevent cross-contamination since water supplies radiologically controlled areas. However, the focus of the safety evaluation (DCD FSAR Tier 2, Rev. 19, Section 9.2.5.4 and Figure 9.2.5-1) is on supplying water to the control room. Given that the Turkey Point COLA addresses the connection to a site-specific potable water supply system, the design description in FSAR Tier 2, Rev. 3, Section 9.2.5 does not show how the potable water supply system will be connected to the plant and does not describe specific design features to prevent radioactive contamination of potable water since it will be servicing areas of the plant that contain radioactive materials and contaminated systems. The system operation described in FSAR Tier 2, Rev. 3, Section 9.2.5.3 does not address what types of administrative control measures will be applied to avoid any inadvertent connection of the potable water supply to radioactively contaminated plant systems.

The applicant is requested to revise the system operation and safety evaluation of the potable water system described in FSAR Tier 2, Rev. 3, Section 9.2.5.3 by providing information that describes administrative control measures and design features that will ensure that the potable water system does not become contaminated whenever the system is servicing radiologically controlled areas. The design features and administrative control measures should provide assurance that the plant's potable water supply will be protected from radioactive contamination and comply with the requirements of Part 20.1101 in protecting workers, and Part 20.1406, GDC 60 of Appendix A Part 50, IE Bulletin 80-10 to prevent the possibility of unmonitored and uncontrolled releases of radioactivity and contamination of plant facilities and environment.

**FPL RESPONSE:**

The design and proposed operation and maintenance features of the Potable Water System (PWS) are provided in the Design Control Document (DCD) Tier 1 section 2.7 and Tier 2 section 9.2.5, 9.2.11, 14.2.9.1.6, and Technical Specification Bases 3.7.6.

The NRC review and acceptance of the PWS is documented in NUREG-1793, Supplement 2 (2011), sections 9.2.5 and 23.E. In these sections, the NRC found the design of the PWS to meet applicable regulatory acceptance criteria. The NRC relied upon the PWS description in Revision 17 of the DCD as supplemented by APP-GW-GLN-124 (TR-124)

and information contained in Westinghouse letter DCP NRC\_002994 dated August 2, 2010. The PWS description in Revision 19 of the DCD (the certified design) is unchanged from that of Revision 17.

The PWS design features that ensure that the potable water system does not become contaminated whenever the system is servicing radiologically controlled areas include:

- No interconnections exist between the PWS and any potentially radioactive system or any system using water for purposes other than domestic water service.
- The water source into the PWS is protected from back flow by the use of air gaps or reduced pressure backflow preventers
- In its only safety-related function, the PWS servicing the main control room (MCR) is fitted with an isolation valve, a loop seal, and a vacuum breaker to provide MCR isolation to assure integrity of the MCR during design basis events.

This response is PLANT SPECIFIC.

**References:**

1. TR-124, "Removal of PWS Source and WWS Retention Basins from the Westinghouse AP1000 Scope of Certification," APP-GW-GLN-124, Revision 0, June 2007.
2. Letter, Westinghouse to USNRC Document Control Desk, DCP NRC\_002994, "AP1000 Response to Request for Additional Information (SRP 23)," August 2, 2010

**ASSOCIATED COLA REVISIONS:**

No COLA changes have been identified as a result of this response.

**ASSOCIATED ENCLOSURES:**

None