



DEC 23 2013

L-2013-340
10 CFR 50.54(f)

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

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

Commitment Revision for L-2013-256, "Florida Power & Light Company's Turkey Point Units 3 and 4, Supplemental Response to NRC 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"

References:

1. NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012, ADAMS Accession No. ML12053A340.
2. FPL Letter, M. Kiley (FPL) to NRC (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.
3. FPL Letter, M. Kiley (FPL) to NRC (L-2013-256), "Florida Power & Light Company's, Turkey Point Units 3 and 4, Supplemental Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated August 22, 2013.

On March 12, 2012, the U. S. Nuclear Regulatory Commission (NRC) issued a letter (Reference 1) to Florida Power and Light Company (FPL) requesting information pursuant to Title 10 of the Code of Federal Regulations 50.54(f). Enclosure 2 of Reference 1 requested that each licensee perform a reevaluation of external flooding sources and report the results in accordance with the NRC's prioritization plan.

FPL provided the requested information in letter L-2013-087, dated March 11, 2013 (Reference 2). FPL supplemented the response in FPL letter L-2013-256 (Reference 3), which provided a list of interim actions taken and their completion dates, along with additional supporting actions and associated implementation dates. FPL committed to notify the NRC if any of the interim actions or implementation dates will be modified.

The purpose of this letter is to notify the NRC of a revised interim action stated in Reference 3, Turkey Point Units 3 and 4 Flood Hazard Re-evaluation Report Interim Action Commitments, Item 3.

Commitment Revision:

FPL has followed the regulatory commitment process outlined in NEI 99-04, "Guidelines for Managing NRC Commitment Changes" to evaluate and revise the regulatory commitment. The original regulatory commitment (Reference 3) was made in response to a request for information under 10 CFR 50.54(f).

ADD1
NRR

The commitment revision pertains to the interim implementing action to reinforce the stoplogs on East side of plant to withstand hydrostatic, hydrodynamic, waterborne projectile and debris loading. As a defense in depth, it was recommended that concrete barriers be placed in front of the stoplogs during a design basis flood event to preclude damage from smaller waterborne debris. The reason for the commitment revision is based on an engineering evaluation that justifies that the stoplogs are protected from direct impact of large waterborne projectiles by several intervening structures. Further engineering evaluation has shown that the stoplogs can withstand the new hydrostatic and hydrodynamic forces generated in the flooding re-evaluation analysis (Reference 2). As stated in Reference 2, the current licensing bases do not address waterborne projectiles and debris loading on structures, therefore, these effects will be addressed in the integrated assessment. Since the submittal of Reference 2, additional engineering evaluations have shown that intervening structures protect the stoplogs from large waterborne projectiles and floating debris. The ability of the stoplogs to withstand smaller waterborne projectiles and debris loading has not been quantified at this time and will be addressed in the integrated assessment. As a temporary defense in depth measure, concrete barriers will be installed in front of the stoplogs as part of the storm preparation activities until the integrated assessment is completed. If the assessment shows the stoplogs need additional re-enforcement, permanent features will be described as part of the assessment.

Per NEI's 99-04 commitment revision evaluation process, FPL determined that no prior NRC approval is required for this regulatory commitment revision.

Tables 1 and 2 of the Enclosure provide the original and revised regulatory commitment, respectively. Revisions are underlined and bolded.

If you have any questions or require additional information, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

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

Executed on December 13, 2013.

Very truly yours,



Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

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Enclosure

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant

**Turkey Point Nuclear Plant
Original and Revised Commitment**

TABLE 1
ORIGINAL REGULATORY COMMITMENT
Stoplogs on East Side of plant to be reinforced to withstand hydrostatic, hydrodynamic, waterborne projectile and debris loading.

TABLE 2
REVISED REGULATORY COMMITMENT
Stoplogs on East Side of <u>the plant</u> to be reinforced to withstand hydrostatic, hydrodynamic, waterborne projectile and debris loading <u>will have concrete barriers installed to provide protection against small floating debris as part of the storm preparation activities.</u>