



February 26, 2014
L-2014-042

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, 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)

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 ML 12056A044.
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 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 and Light Company's, Turkey Point Units 3 and 4, First Six Month Status Report in Response to March 12, 2012 Commission's Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, ADAMS Accession No. ML13248A313.
6. NRC Letter, 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.

ADD
NRC

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. In Reference 2, FPL submitted an Overall Integrated Plan for the implementation of this Order. The NRC Staff sent a request for additional information (RAI) (Reference 3). FPL provided supplemental information by letters L-2013-225, and L-2013-248 (References 4 and 5). On November 19, 2013, the NRC issued the interim staff evaluation (Reference 6), which also includes RAIs, response to which FPL will be providing in the 6-months status updates as the information becomes available.

The Order required Licensees to provide periodic status reports for the Overall Integrated Plan. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1 and to update the status of RAIs.

The enclosure to this letter provides a status update since the last report of milestone accomplishments, any changes to the compliance method, schedule, need for relief, if any and RAI responses.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Turkey Point Licensing Manager, at 305-246-7327.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on February 26, 2014

This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

Sincerely,



Michael Kiley
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-2014-042

ENCLOSURE

**FLORIDA POWER & LIGHT COMPANY'S
TURKEY POINT UNITS 3 and 4
SECOND SIX MONTH STATUS REPORT IN RESPONSE TO
MARCH 12, 2012 COMMISSION ORDER TO MODIFY 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 (Reference 1) documenting the modification with regard to reliable Spent Fuel Pool Instrumentation (SFPI) in response to Reference 2. This enclosure provides the second update of milestone accomplishments since submittal of the Overall Integrated Plan, 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 Overall Integrated Plan submitted on February 26, 2013 (Reference 1).

3. Milestone Schedule Status

The Milestone Schedule initially provided in the Overall Integrated Plan (Reference 1 - Enclosure) and reiterated in Turkey Point's First Six Month Update submitted on August 21, 2013 (Reference 3) has not been changed.

4. Changes to Compliance Method

There currently are no changes to the compliance method documented in the Overall Integrated Plan (Reference 1). 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 (Reference 2) or guidance document JLD-ISG-2012-03 (Reference 4) at this time.

Consistent with the requirements of Order EA-12-051 (Reference 2) 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). Due to ongoing efforts to work through vendor design issues, response to several of these latest RAIs will be deferred and shown "in progress." The following table provides a summary of the status of the RAIs (As re-numbered in Reference 6).

RAI	Status
RAI – 1	In progress
RAI – 2 a, b, c	In progress
RAI – 3	In progress
RAI – 4	In progress
RAI – 5 a, b, c	In progress
RAI – 6	In progress
RAI – 7 a, b	In progress
RAI – 8 a, b	In progress
RAI – 9 a, b	In progress
RAI – 10 a, b, c, d	In progress
RAI – 11 a, b	In progress
RAI – 12	Response provided
RAI – 13 a, b, c	Responses provided

The RAI responses showing "in progress" require design information that is not available at this time. Responses to these RAIs will be provided when available.

The following RAI responses are included:

RAI-12

Please provide a list of the procedures addressing operation (both normal and abnormal response), calibration, test, maintenance, and inspection procedures that will be developed for use of the spent SFP Instrumentation. The licensee is requested to include a brief description of the specific technical objectives to be achieved within each procedure.

FPL Response to RAI-12

The modification review process will be used to ensure all necessary procedures are developed for maintaining and operating the spent fuel level instruments upon installation. These procedures will be developed in accordance with the FPL procedural control process.

The objectives of each procedural area are described below:

Inspection, Calibration, and Testing - Guidance on the performance of periodic visual inspections, as well as calibration and testing, to ensure that each SFP instrument channel is operating and indicating level within its design accuracy.

Preventative Maintenance - Guidance on scheduling of, and performing, appropriate preventative maintenance activities necessary to maintain the instruments in a reliable condition.

Maintenance - To specify troubleshooting and repair activities necessary to address system malfunctions.

Programmatic Controls - Guidance on actions to be taken if one or more channels is out of service.

System Operations - To provide instructions for operation and use of the system by plant staff.

Response to inadequate levels - Action to be taken on observations of levels below normal level will be addressed in site Off Normal procedures and /or FLEX Support Guidelines

RAI-13

Please provide the following:

- a) Further information describing the maintenance and testing program the licensee will establish and implement to ensure that regular testing and calibration is performed and verified by inspection and audit to demonstrate conformance with design and system readiness requirements. Include a description of your plans for ensuring that necessary channel checks, functional tests, periodic calibration, and maintenance will be conducted for the level measurement system and its supporting equipment.
- b) A description of how the guidance in NEI 12-02 Section 4.3 regarding compensatory actions for one or both non-functioning channels will be addressed.
- c) A description of the compensatory actions to be taken in the event that one of the instrument channels cannot be restored to functional status within 90 days.

FPL Response to RAI-13.a

The SFPI channel/equipment maintenance/preventative maintenance and testing program requirements to ensure design and system readiness will be established in accordance with FPL's processes and procedures. The design modification process will take into consideration the vendor recommendations to ensure that appropriate regular testing, channel checks, functional tests, periodic calibration, and maintenance are performed (and available for inspection and audit).

Once the maintenance and testing program requirements for the SFP are determined, the requirements will be documented in Maintenance program documents.

Performance checks, described in the Vendor Operator's Manual, and the applicable information will be contained in plant procedures. Operator performance tests will be performed periodically as recommended by the vendor.

Channel functional tests with limits established in consideration of vendor equipment specifications will be performed at appropriate frequencies.

Channel calibration tests per maintenance procedures, with limits established in consideration of vendor equipment specifications, are planned to be performed at frequencies established in consideration of vendor recommendations.

FPL Response to RAI-13.b

Both primary and backup SFPI channels incorporate permanent installation (with no reliance on portable, post-event installation) of relatively simple and robust augmented quality equipment. Permanent installation coupled with stocking of adequate spare parts reasonably diminishes the likelihood that a single channel (and greatly diminishes the likelihood that both channels) is (are) out-of-service for an extended period of time. Planned compensatory actions for unlikely extended out-of-service events are summarized as follows:

# Channel(s) Out-of-service	Required Restoration Action	Compensatory Action
1	Initiate actions to restore channel to functional status within 90 days.	Initiate actions in accordance with Note 1.
2	Initiate action to restore at least one channel to functional status within 24 hours.	Initiate compensatory actions for monitoring Spent Fuel Pool level within 72 hours. (Note 2)

Note 1: If channel restoration is not expected to be completed within 90 days initiate compensatory action. Initiate an evaluation in accordance with the corrective action program. The evaluation shall determine compensatory actions required if a second channel becomes inoperable. The evaluation shall include a planned schedule for restoring the instrument channel(s) to functional status.

Note 2: Initiate an evaluation in accordance with the corrective action program. The evaluation shall document compensatory actions taken or planned to be taken to implement an alternate method of monitoring and schedule required actions for restoring the instrumentation channel(s) to functional status.

FPL Response to RAI 13.c

See RAI-13.b response above.

7. Enclosure References

The following references support the updates to the Overall Integrated Plan described in this enclosure:

1. 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 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 ML 12056A044.
3. FPL Letter, L-2013-248, Florida Power and Light Company's, Turkey Point Units 3 and 4, First Six Month Status Report in Response to March 12, 2012 Commission's Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 21, 2013, ADAMS Accession No. ML13248A313.
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, 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.