



March 28, 2014

L-2014-093  
10 CFR 2.390

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

Re: St. Lucie Unit 2  
Docket No. 50-389  
Application for Withholding 2.390 Information From Public Disclosure

Florida Power and Light (FPL) held a teleconference with the NRC Staff on March 20, 2014 to discuss the preliminary unverified results of the St. Lucie Unit 2 steam generator inservice inspection (ISI) activities. FPL provided a written summary of the results to the NRC Staff to facilitate the discussions. This letter contains an affidavit that sets forth the basis on which some information may be withheld from public disclosure by the Commission and addresses the specificity of the consideration listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that the attached information be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Attachment 1 contains the subject affidavit, and Attachment 2 contains the redacted version of the St. Lucie Unit 2 SL2-21 refueling outage steam generator ISI inspection summary.

Please contact Eric Katzman, Licensing Manager at (772) 467-7734 if there are any questions related to this matter.

Sincerely,

Eric S. Katzman  
Licensing Manager  
St. Lucie Plant

ESK/KWF

Attachments

A047  
NRK

AFFIDAVIT

Before me, the undersigned authority, personally appeared Rudy Gil, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of NextEra Energy, and the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:

*R* 3/28/14

Rudy Gil

Corporate Manager of Programs for the NextEra Energy

STATE OF FLORIDA

COUNTY OF St. Lucie

Sworn to and subscribed before me this 28th day of March, 2014, by Rudy Gil.

*Leslie J. Whitwell*



Personally Known ☒ OR Produced Identification ☐

Type of Identification Produced \_\_\_\_\_

- 1) I am the Corporate Manager of Programs for the NextEra Energy, Inc. nuclear fleet, and as such, I have been specifically delegated the function of reviewing the information sought to be withheld from public disclosure in connection with the meeting held with members of the Commission on March 20, 2014, and am authorized to apply for its withholding on behalf of NextEra Energy, Inc.
- 2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the NextEra Energy, Inc. for Withholding Commercial Information from Public Disclosure accompanying this Application.
- 3) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
  - a. The information sought to be withheld from public disclosure is owned and has been held in confidence by NextEra Energy, Inc.
  - b. The information is being provided to the Commission in confidence for the sole purpose of facilitating a discussion on the preliminary results of the St. Lucie Unit 2 steam generator inspections.
  - c. The information is preliminary and did not go through the normal verification process applied to information that is submitted to the Commission for public disclosure.
  - d. Disclosure of unverified information is not in the best interest of NextEra Energy, Inc. and its customers.
  - e. This information will be submitted to the Commission for public disclosure as required by the regulations once all applicable verification activities are completed.
  - f. The information sought to be protected is not currently available in public sources.
  - g. The information sought to be withheld in this submittal is that which is contained in the document titled, "NRC Conference Call - St. Lucie Unit 2 Steam Generator Inspection - March, 2014." The specific information is as follows:
    - i. First bullet after the word "identified," under the section titled "Overview of Inspection."
    - ii. Table labelled, "History of wear indications/ affected number of tubes (Cumulative)."
    - iii. Table labelled, "Wear rate progression (%/EFY)."
    - iv. Figure labelled, "Wear distribution."
    - v. Second and third bullets under the section titled, "Preliminary CMOA Results."

Disclosure of unverified information is not in the best interest of NextEra Energy, Inc. and its customers.

Further the deponent sayeth not.

**NRC CONFERENCE CALL  
ST. LUCIE UNIT 2 STEAM GENERATOR INSPECTION  
March, 2014**

**AREVA 86/19 TI REPLACEMENT STEAM GENERATOR (RSG)**

**General Issues:**

- There was no primary-to-secondary side leakage identified during the last cycle
- No exceptions have been taken from the industry guidelines

**Overview of Inspection:**

- No tube integrity issues identified[ ]
- Average wear rate remained approximately the same as in 2012, even with the higher flow rates associated with the power uprate
- Preliminary OA supports full cycle operation
- Additional preventive plugging will be implemented to increase margin; similar to past inspections
- SONGS operating experience was applied to the inspection; no issues were identified

**Examination Scope for fourth in-service inspection:**

- 100% Bobbin
- +Point of all periphery tubes hot & cold leg
- +Point diagnostics based on bobbin results
- +Point discretionary profiling

**Inspection Observations:**

- The number of new indications, wear rates, maximum wear and maximum wear growth are all within the values predicted by the operational assessment.

**NRC CONFERENCE CALL  
ST. LUCIE UNIT 2 STEAM GENERATOR INSPECTION  
March, 2014**

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**Preliminary CMOA Results:**

- Independent assessments will be performed by Aptech and Areva
- [
- ]
- Plan to inspect next outage

**Secondary Side Scope:**

- Sludge Lance and Upper Bundle Flush - SG A, SG B
- FOSAR - SG A, SG B
  - Still in progress
- General Walkdown SG A, SG B
- Upper Steam Drum
  - A key from one of the feedwater ring assembly supports was found on the debris screen. Investigation is in progress and repairs are being developed in parallel.

**Conclusions:**

- Steam Generators wear issue continues to be manageable within the steam generator program
  - No tube integrity issues identified
  - Average and statistical wear rate at approximately 2012 levels; further attenuation expected, but may have been delayed by increased power uprate flows, as expected
  - Preliminary OA supports full cycle operation
  - Additional preventive plugging will be implemented to increase margin; similar to past inspections
- Inspection planned after one cycle of operation