



August 19, 2014

L-2014-271
10 CFR 50.90

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Facility Operating License Nos. DPR-67 and NPF-16
Revised License Amendment Request
Change of the Milestone 8 Completion Date

References:

1. R. Anderson (FPL) letter to Document Control Desk (L-2010-149), "Resubmittal of Cyber Security Plan," August 2, 2010, (ADAMS Accession No. ML102180183).
2. J. Jensen (FPL) letter to Document Control Desk (NRC), (L-2012-220), "License Amendment Request – Cyber Security Plan Implementation Schedule Milestones," June 21, 2012, (ADAMS Accession No. ML12178A384).
3. T. Orf (NRC) letter to M. Nazar (FPL), "St. Lucie Plant, Units 1 and 2 – Issuance of Amendments Regarding Approval of the St. Lucie Cyber Security Plan (TAC Nos. ME4582 and ME4583," August 31, 2011, (ADAMS Accession No. ML11196A079).
4. T. Orf (NRC) letter to M. Nazar (FPL), "St. Lucie Plant, Units 1 and 2 – Issuance of Amendments Regarding Revision to Cyber Security Plan Milestone 6 (TAC Nos. ME9128 and ME9129," December 17, 2012, (ADAMS Accession No. ML12339A109).
5. FPL Letter L-2014-271 dated June 30, 2014, "License Amendment Request Change of the Milestone 8 Completion Date" (ADAMS Accession No. ML14192A022)

In Reference 5, Florida Power & Light (FPL) submitted the request to amend the Cyber Security Plan for St. Lucie Units 1 and 2 to change the implementation date for Milestone 8. The Cyber Security Plan and implementation schedule were previously provided in References 1 and 2 and approved by the NRC in References 3 and 4. However, Reference 5 conservatively designated all of Attachment 1 as Security-Related Information to be withheld from the public. This letter revises the Attachments to allow additional portions to be released to the public.

This submittal revision is considered editorial in nature and the original no significant hazards evaluation remains bounding.

Attachment 1 transmitted herewith contains ~~security-related information to be withheld under 10 CFR 2.390~~. When separated from this transmittal, the remaining transmittal document is decontrolled.

Florida Power & Light Company

A001
NRR

Should you have any questions regarding this submittal, please contact Mr. Eric Katzman, Licensing Manager at (772) 467-7734.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 19th day of August, 2014.

Very truly yours,

James W. Cronnelly (acting Site Vice President)

Joe Jensen
Site Vice President
St. Lucie Plant

Attachments:

1. Analysis of Proposed Operating License Change
2. Regulatory Evaluation
3. Proposed Operating License Change (marked-up pages)
4. Revised Operating License (retyped pages)

cc: Ms. Cynthia Becker Chief - Florida Bureau of Radiation Control

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~~to be withheld under 10 CFR 2.390~~. When separated from this transmittal,
the remaining transmittal document is decontrolled.

Attachment 2 Regulatory Evaluation

1. REGULATORY EVALUATION

- 1.1 Applicable Regulatory Requirements/Criteria
- 1.2 No Significant Hazards Consideration Determination
- 1.3 Conclusions

2. ENVIRONMENTAL CONSIDERATION

1. REGULATORY EVALUATION

1.1 Applicable Regulatory Requirements/Criteria

10 CFR 73.54 requires licensees to maintain and implement a Cyber Security Plan (CSP). St. Lucie Units 1 and 2, Facility Operating Licenses (FOLs) Nos. DPR-67 and NPF-16, respectively, include a Physical Protection license condition that requires FPL to fully implement and maintain in effect all provisions of the Commission-approved CSP, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

1.2 No Significant Hazards Consideration Determination

FPL is requesting approval of changes to St. Lucie Units 1 and 2, FOLs Nos. DPR-67 and NPF-16, respectively to revise the Physical Protection license condition as it relates to the Cyber Security Plan. This change includes a proposed deviation to the Cyber Security Plan implementation schedule and a proposed revision to the St. Lucie FOLs to include the proposed deviation. Specifically, FPL proposes to change the completion date for full implementation (Milestone 8) of the Cyber Security Plan.

FPL has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as described below:

- (1) Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. The change does not alter accident analysis assumptions, add any initiators or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability or the structures, systems and components relied upon to mitigate the consequences of postulated accidents and has no impact on the probability or consequences of an accident previously evaluated. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. This proposed change does not alter

accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems and a component relied upon to mitigate the consequences of postulated accidents and does not create the possibility of a new or different kind of accident from any accident previously evaluated. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Plant safety margins are established through limiting conditions of operation, limiting safety systems settings and safety limits specified in the technical specifications. The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. Because there is no change in these established safety margins as result of this change, the proposed change does not involve a significant reduction in a margin of safety. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, FPL concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

1.3 Conclusion

Based on the considerations described above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be in compliance with the Commission's regulations and (3) the issuance of amendments will not be inimical to the common defense and security or to the health and safety of the public.

2. ENVIRONMENTAL CONSIDERATION

The proposed amendment provides a change to the Cyber Security Plan implementation schedule. The proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(12). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

Attachment 3

St. Lucie Units 1 and 2

**Facility Operating License Nos. DPR-67 and NPF-16
Proposed Operating License Change
(marked-up pages)**

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E. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report for the facility (The fire protection program and features were originally described in FPL submittals L-83-514 dated October 7, 1983, L-83-227 dated April 12, 1983, L-83-261 dated April 25, 1983, L-83-453 dated August 24, 1983, L-83-488 dated September 16, 1983, L-83-588 dated December 14, 1983, L-84-346 dated November 28, 1984, L-84-390 dated December 31, 1984, and L-85-71 dated February 21, 1985) and as approved by NRC letter dated July 17, 1984, and supplemented by NRC letters dated February 21, 1985, March 5, 1987, and October 4, 1988, subject to the following provision:

FPL may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

F. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light & FPL Energy Seabrook Physical Security Plan, Training and Qualification Plan and Safeguards Contingency Plan - Revision 3," submitted by letter dated May 18, 2006. St. Lucie shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The St. Lucie CSP was approved by License Amendment No. 211 as supplemented by a Clarification approved by License Amendment No. 214.

G. Mitigation Strategy License Condition

s and No. XXX.

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

- (a) Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - 5. Training of response personnel
- (b) Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment

Renewed License No. DPR-67
Amendment No. 214
Revised by letter dated December 17, 2012

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The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light & FPL Energy Seabrook Physical Security Plan, Training and Qualification Plan and Safeguards Contingency Plan - Revision 3," submitted by letter dated May 18, 2006. St. Lucie shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). St. Lucie CSP was approved by License Amendment No. 160 as supplemented by a clarification approved by License Amendment No. 164 and No. XXX.

G. Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement dated April 1982, FPL shall provide written notification to the Office of Nuclear Reactor Regulation.

H. DELETED

I. FPL shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

J. FPL shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

K. The use of ZIRLO™ clad fuel at St. Lucie Unit 2 will be subject to the following restrictions:

FPL will limit the fuel duty for St. Lucie Unit 2 to a baseline modified Fuel Duty Index (mFDI) of 600 with a provision for adequate margin to account for variations in core design (e.g., cycle length, plant operating conditions, etc). This limit will be applicable until data is available demonstrating the performance of ZIRLO™ cladding at Combustion Engineering 16x16 plants.

FPL will restrict the mFDI of each ZIRLO™ clad fuel pin to 110 percent of the baseline mFDI of 600.

For a fraction of the fuel pins in a limited number of assemblies (8), FPL will restrict the fuel duty of ZIRLO™ clad fuel pins to 120 percent of the baseline mFDI of 600.

Attachment 4

St. Lucie Units 1 and 2

**Facility Operating License Nos. DPR-67 and NPF-16
Revised Operating License
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