

PMLevyCOLPEm Resource

From: Habib, Donald
Sent: Friday, May 20, 2016 4:04 PM
To: PMLevyCOLPEm Resource
Subject: FW: Additional Comments on Levy FSER

From: Waters, David B [mailto:David.Waters2@duke-energy.com]
Sent: Friday, May 20, 2016 4:02 PM
To: Habib, Donald <Donald.Habib@nrc.gov>
Cc: Kitchen, Robert H <Robert.Kitchen@duke-energy.com>
Subject: [External_Sender] Additional Comments on Levy FSER

Don

As we discussed, here are the additional comments that our reviewers have identified so far on the FSER Chapters. We are providing these in advance so that the necessary corrections can be made to the final FSER.

Chapter 1

On page 1-39, the last sentence in the 1st paragraph on that page states: “DEF recovers the cost of electricity through rates established by the entity itself or by the Florida Public Service Commission”. I don’t recall any information we have submitted to the NRC that states that DEF establishes its own rates. LNP COLA Part 1, Section 2.2, states that “DEF . . . recovers the cost of this electricity through cost-of-service based rates established by the FPSC, and FERC.”

Chapter 13 – EP ITAAC Comments

The following are suggested corrections to LNP FSER Table 13.3-1, Emergency Plan ITAAC, for consistency with LNP COLA Part 10 Table 3.8-1 (most are editorial, some are missing information):

- a. P. 13-34: Item 7.2 information is not listed in the correct columns, and should all be shifted one column to the right. Specifically, the planning standard listed should be moved under the EP program elements column (consistent with 7.1 and 7.3 through 7.6 program elements); the 7.2 information under the program elements column should be moved to the ITA column; 7.2.1 through 7.2.4 under the ITA column should be moved to the AC column; and item 7.2 under the AC column should be deleted (it is a duplicate of the 7.2 program element).
- b. P. 13-35: Similar to the comment above, ITA 7.2.5 should be moved to the AC column.
- c. P. 13-36/37: Some of the acceptance criteria for 8.1.B are not included in FSER Table 13.3-1. Specifically, items 3 through 7 are missing (see page LC-B30 of LNP COLA Part 10).
- d. Page 13-39: The 6th line of ITA 8.7 states “. . . an a radiological hazards . . .” This does not appear to be correct. The COLA has “an” instead of “an a”; but that doesn’t appear to be exactly correct either. Perhaps it should be “any”.
- e. Page 13-43: The formatting across the top of this page does not appear to be correct (the first two lines of table text are shaded and appear to be in a table cell).
- f. Page 13-52: Under AC 2 (12.1.1.D.2), items a and b are missing. See pages LC-B41 & 42 of LNP COLA Part 10.
- g. Page 13-54: The first two standard criteria on this page should be labeled as “a” and “b”, and the last should be labeled “a”.
- h. Page 13-61: The second standard criterion on this page should be labeled “b” rather than “a”.
- i. Page 13-62: The third standard criterion on this page should be labeled “c” rather than “b”.

Second comment on Chapter 13

License Condition (13-9) on page 13-322: The ASE had an additional phrase/option at the end of this license condition (“or the plant has been placed in commercial service, whichever comes first”). This last phrase has been deleted in the LC in the FSE. In that case, then “either” should also be deleted from the last line of the LC since there are no longer two options for when to conclude schedule updates.

Chapter 16

The 2nd paragraph in Section 16.1.1 discusses "Standard Technical Specifications" and specifically NUREG 1431. Just as an FYI, NUREG-2194 (AP1000 Standard Tech Specs) was issued April 2016. The info in this paragraph is a little out of date

Thanks

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