UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 26, 2016

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
Florida Power & Light Company
Mail Stop NT3/JW
15430 Endeavor Drive
Jupiter, FL 33478

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 – SAFETY EVALUATION FOR RELIEF REQUEST NO. 4 FOR FIFTH 10-YEAR INSERVICE INSPECTION INTERVAL – RISK-INFORMED INSERVICE INSPECTION PROGRAM (CAC NOS. MF7277 AND MF7278)

Dear Mr. Nazar:

By application dated January 14, 2016 (L-2016-006), as supplemented by letter L-2016-141 dated July 27, 2016, Florida Power & Light Company (the licensee) submitted Relief Request No. 4 for the fifth 10-year inservice inspection (ISI) interval of Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Paragraph 55a(z)(1), the licensee requested the U.S. Nuclear Regulatory Commission (NRC) to authorize an alternative to examination requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, 2007 Edition with Addenda through 2008, as amended by 10 CFR, Section 50.55a. The licensee proposed to revise the Turkey Point ISI Program for Class 1 and 2 piping through the use of the Risk-Informed ISI Program.

The NRC staff reviewed the subject request and, as set forth in the enclosed safety evaluation, concludes that the licensee adequately addressed the regulatory requirements in 10 CFR 50.55a(z)(1). Accordingly, the NRC staff authorizes Relief Request No. 4 at Turkey Point for the remainder of the fifth 10-year ISI interval, which is currently scheduled to end on February 21, 2024, for Unit 3 and on April 14, 2024, for Unit 4.

All other requirements of 10 CFR 50.55a, the ASME BPV Code, Section XI, and the ASME Operation and Maintenance Code for which relief was not specifically requested and approved, remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions regarding this issue, please contact the project manager, Ms. Audrey Klett, at (301) 415-0489 or by e-mail at Audrey.Klett@nrc.gov.

Sincerely,

Jeanne A. Dion, Acting Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure:
Safety Evaluation

cc w/encl.: Distribution via Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST NO. 4

FIFTH 10-YEAR INSERVICE INSPECTION INTERVAL

FLORIDA POWER & LIGHT COMPANY

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By application dated January 14, 2016 (L-2016-006),[1] as supplemented by letter L-2016-141 dated July 27, 2016,[2] Florida Power & Light Company (the licensee) submitted Relief Request No. 4 (RR No. 4) for the fifth 10-year inservice inspection (ISI) interval at Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Paragraph 55a(z)(1), the licensee requested the U.S. Nuclear Regulatory Commission (NRC) to authorize an alternative to the examination requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, 2007 Edition with Addenda through 2008, as amended by 10 CFR 50.55a. The licensee proposed to revise the Turkey Point ISI Program for Class 1 and 2 piping through the use of the Risk-Informed Inservice Inspection (RI-ISI) Program as an alternative to the requirements of Class 1 and 2 examination Categories B-F, B-J, C-F-1, and C-F-2 as specified in Tables IWB 2500-1 and IWC 2500-1 of the ASME Code, Section XI, 2007 Edition with 2008 Addenda.

By electronic mail (email) dated June 27, 2016,[3] the NRC staff issued a request for additional information (RAI) to the licensee. By letter dated July 27, 2016, the licensee responded to the NRC staff's request.

2.0 REGULATORY EVALUATION

Pursuant to 10 CFR 50.55a(z)(1), alternatives to the requirements of paragraphs (b) through (h) of 10 CFR 50.55a or portions thereof may be used when authorized by the NRC if the licensee demonstrates that the proposed alternatives provide an acceptable level of quality and safety. A proposed alternative must be submitted and authorized prior to implementation.

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[1] Agencywide Documents Access and Management System (ADAMS) Accession No. ML16033A355.
[2] ADAMS Accession No. ML16217A458.
[3] ADAMS Accession No. ML16180A024.

NRC Regulatory Guide (RG) 1.174, Revision 2, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis,"[4] provides guidance on the use of probabilistic risk assessment (PRA) findings and risk insights to support licensee requests for changes to a plant's licensing basis. RG 1.174, Revision 2 defines an acceptable approach to analyzing and evaluating proposed licensing basis changes to include traditional engineering evaluations supported by insights derived from the use of PRA methods about the risk significance of the proposed changes. Expectations for implementation of risk-informed decision making licensing basis changes include meeting the acceptance guidelines and key principles of risk-informed regulation as delineated in RG 1.174, Revision 2.

RG 1.178, Revision 1, "An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping,"[5] describes an acceptable approach for using PRA in support of an RI-ISI and for meeting ASME Code, Section XI requirements for the scope and frequency of inspection of ISI programs.

RG 1.200, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities,"[6] describes an acceptable approach for determining whether the quality of the PRA, in total or the parts that are used to support an application, is sufficient to provide confidence in the results, such that the PRA can be used in regulatory decision making for light-water reactors. RG 1.200 provides regulatory guidance for assessing the technical adequacy of a PRA. The current revision (i.e., Revision 2) of this RG endorses, with clarifications and qualifications, the use of (1) ASME/American Nuclear Society (ANS) Standard, RA-Sa-2009, "Addenda to ASME RA-S-2008 Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications" (i.e., the PRA Standard), (2) Nuclear Energy Institute (NEI) 00-02, "Probabilistic Risk Assessment (PRA) Peer Review Process Guidelines,"[7] and (3) NEI 05-04, Revision 2, "Process for Performing Internal Events PRA Peer Reviews Using the ASME/ANS PRA Standard."[8]

Electric Power Research Institute (EPRI) Topical Report TR-1021467-A, "Nondestructive Evaluation: Probabilistic Risk Assessment Technical Adequacy Guidance for Risk-Informed InService Inspection Programs,"[9] provides guidance on the minimum acceptable quality requirements for a PRA used to support an RI-ISI program.

EPRI TR-112657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure,"[10] provides a methodology for developing an RI-ISI.

The NRC staff finds that regulatory authority exists for licensee to request and the NRC to authorize the alternative requested by the licensee for the remainder of the fifth 10-year ISI intervals. Accordingly, the NRC staff reviewed and evaluated the licensee's request pursuant to 10 CFR 50.55a(z)(1).

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[4] ADAMS Accession No. ML100910006.
[5] ADAMS Accession No. ML032510128.
[6] ADAMS Accession No. ML090410014.
[7] ADAMS Accession Nos. ML061510619 and ML063390588.
[8] ADAMS Accession No. ML083430462.
[9] ADAMS Accession No. ML12171A450.
[10] ADAMS Accession No. ML013470102.

3.0 TECHNICAL EVALUATION

3.1 Components Affected by the Proposed Alternative

The components affected by authorization of RR No. 4 are the ASME Code Class 1 and 2 pressure retaining similar and dissimilar piping welds listed in the table in Section 1 of RR No. 4. In accordance with ASME Code, Section XI, IWB-2500 (Table IWB-2500-1), the Class 1 pressurizer nozzle to pipe dissimilar metal (DM) welds are classified as Examination Category B-F, Item Nos. B5.10, B5.40 and B5.70. The Class 1 piping welds are classified as Examination Category B-J, Item Nos. B9.11, B9.21, B9.31, B9.32, and B9.40. In accordance with ASME Code, Section XI, IWC-2500, Table IWC-2500-1, the Class 2 austenitic stainless steel or high alloy piping welds are classified as Examination Category C-F-1, Item Nos. C5.11, C5.21, C5.30, and C5.41. The Class 2 carbon or low alloy steel piping welds are classified as Examination Category C-F-2, Item Nos. C5.51, C5.61, and C5.81.

3.2 Applicable Code Edition and Addenda

The code of record for the fifth 10-year ISI interval is the 2007 Edition with 2008 Addenda of the ASME Code, Section XI.

3.3 Duration of Proposed Alternative

The licensee requested to implement the alternative requirements during the fifth 10-year ISI interval, which, for Turkey Point Unit 3, began on February 22, 2014, and ends on February 21, 2024, and for Turkey Point Unit 4, began on April 15, 2014, and ends on April 14, 2024.

3.4 ASME Code Requirement

ASME Code, Section XI, Table IWB-2500-1, Examination Categories B-F and B-J require the Class 1 welds be subjected to the volumetric or surface examination, or both, during successive 120-month (i.e., 10-year) intervals. According to these requirements, 100 percent of all nozzle-to-pipe DM welds in Examination Category B-F, and 25 percent of all piping welds with more than 1-inch nominal diameter in Examination Category B-J shall be inspected.

ASME Code, Section XI, Table IWC-2500-1, Examination Category C-F-I and C-F-2, require the Class 2 piping welds be subjected to the volumetric or surface examination, or both, during successive 120-month (i.e., 10-year) intervals. According to these requirements, 7.5 percent of non-exempt piping welds in Examination Category C-F-I and C-F-2 shall be inspected.

3.5 Licensee Proposed Alternative to the ASME Code Requirement

The licensee proposed an RI-ISI program as an alternative to the ASME Code requirements discussed in Section 3.4 of this safety evaluation. The licensee stated that the objective of RR No. 4 was to convert the RI-ISI Program for Class 1 and 2 piping welds during the fifth 10-year ISI interval to a different process than that used during the previous interval. During the previous internal, the licensee implemented an RI-ISI Program for Class 1 piping welds in accordance with the Westinghouse Topical Report WCAP-14572, "Westinghouse Owners

Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report," Revision 1-NP-A."[11] In RR No. 4, the licensee stated that the proposed RI-ISI program for the Turkey Point Units 3 and 4 fifth 10-year intervals for Class 1 and 2 piping will be in accordance with EPRI TR-112657, Revision B-A." The licensee stated that it will implement the RI-ISI program in accordance with EPRI TR-112657, Revision B-A, consistent with the requirements of ASME Code Case N-578-1, "Risk-Informed Requirements for Class 1, 2, or 3 Piping, Method B, Section XI, Division 1," dated March 28, 2000.

3.6 NRC Staff Evaluation

The NRC staff reviewed and evaluated the licensee's proposed RI-ISI program, based on guidance and acceptance guidelines provided in RG 1.174, Revision 2; RG 1.178, Revision 1; and EPRI TR-112657, Revision B-A. An acceptable RI-ISI program is expected to meet the following five key principles of risk-informed decision making.

- Principle 1: The proposed change meets the current regulations unless it is explicitly related to a requested exemption.

- Principle 2: The proposed change is consistent with the defense-in-depth philosophy.

- Principle 3: The proposed change maintains sufficient safety margins.

- Principle 4: When the proposed change results in an increase in core damage frequency (CDF) and/or large early release frequency (LERF), the increase should be small and consistent with the intent of the Commission's Safety Goal Policy statement.

- Principle 5: The impact of the proposed change should be monitored by using performance measures strategies.

Principle 1 Evaluation

The NRC staff determined that the licensee met Principle 1 of RG 1.174, Revision 2 because the proposed RI-ISI program is an alternative to the ASME Code ISI program and may be requested for NRC approval pursuant to 10 CFR 50.55a(z)(1).

Principles 2 and 3 Evaluation

In accordance with RG 1.174, Revision 2, the licensee's engineering analysis should evaluate whether (1) the impact of the proposed RI-ISI program (i.e., the proposed change to the ISI program) is consistent with the defense-in-depth philosophy, and (2) sufficient safety margins are maintained. The staff confirmed that as part of the RI-ISI process, the licensee performed a plant specific engineering analysis in accordance with the guidance in EPRI TR-112657, Revision B-A, to develop the proposed RI-ISI program. The licensee used the industry operating experience and plant-specific piping failure information to identify piping degradation mechanisms and failure modes, performed consequence evaluations and pipe failure assessments to establish piping segment safety ranking, and determined inspection locations

[11] ADAMS Accession No. ML042610469.

and risk significant welds. Therefore, the NRC staff determined that the process followed by the licensee to conduct plant-specific engineering analysis for the purpose of determining risk-significant locations and locations where failure mechanisms are likely to be present is acceptable because the process is consistent with the procedure prescribed in EPRI TR-112657, Revision B-A and the guidance in RG 1.174, Revision 2 and RG 1.178, Revision 1.

The licensee plans to continue to implement augmented inspection programs to address generic piping degradation problems, as required either by the NRC to preclude piping failure or by the industry's good practice guidelines. The following augmented inspection programs will not be changed by the proposed RI-ISI program and will continue to be implemented:

- Materials Reliability Program (MRP)-192, "Assessment of Residual Heat Removal [RHR] Mixing Tee Thermal Fatigue in PWR [Pressurized-Water Reactor] Plants."[12] This program addresses evaluating and examining RHR mixing tee welds within at least four internal pipe diameters downstream from the mixing tee junction point for evidence of thermal fatigue cracking. Because the proposed RI-ISI program does not address all the criteria of MRP-192, this augmented inspection will remain in effect.

- Augmented inspection program for managing thermal fatigue (i.e., MRP-146, "Management of Thermal Fatigue in Normally Stagnant Non-Isolable Reactor Coolant System Branch Lines"[13]). This program addresses management of thermal fatigue in normally non-isolable reactor coolant system branch lines in accordance with MRP-146. Because the proposed RI-ISI program does not address all criteria specified in MRP-146, this augmented inspection will remain in effect.

- Augmented inspection program for feedwater piping (NRC Bulletin 79-13, "Cracking in Feedwater System Piping,"[14] and NRC Information Notice (IN) 93-20, "Thermal Fatigue Cracking of Feedwater Piping to Steam Generators"[15]). This program addresses cracking of feedwater piping caused by thermal fatigue. Because the proposed RI-ISI program does not address all criteria specified in Bulletin 79-13 and IN 93-20, this augmented inspection will remain in effect.

- Augmented inspection program for erosion/corrosion induced pipe wall thinning (NRC Generic Letter 89-08, "Erosion/Corrosion-Induced Pipe Wall Thinning"[16]). This program addresses examination of piping for flow accelerated corrosion and will remain in effect.

The staff determined that the licensee's strategy to continue to implement the existing augmented inspection programs for management of specific piping degradation problems is acceptable, and these programs, in concert with the RI-ISI process of risk significance categorization and the specification of subsequent number and location of elements for examination, is consistent with the defense-in-depth philosophy.

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[12] This document is not available in ADAMS.
[13] This document is not publicly available because it is proprietary.
[14] http://www.nrc.gov/reading-rm/doc-collections/gen-comm/bulletins/1979/bl79013r2.html
[15] http://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1993/in93020.html
[16] http://www.nrc.gov/reading-rm/doc-collections/gen-comm/gen-letters/1989/gl89008.html

Furthermore, the staff determined that there are no changes made by the RI-ISI program to the evaluation of design-basis accidents in the final safety analysis report, as discussed in EPRI TR-112657, Revision B-A. Therefore, the staff determined that the licensee met Principles 2 and 3 of RG 1.174, Revision 2 and that the proposed RI-ISI program is consistent with a defense-in-depth philosophy and maintains sufficient safety margins.

Principle 4 Evaluation

Principle 4 of RG 1.174, Revision 2 requires an evaluation of the change-in-risk between the proposed RI-ISI program and the program the licensee would otherwise be required to implement. The change-in-risk estimate is dependent on the location of inspections in the proposed RI-ISI program compared to the location of inspections that would be performed using the requirements of the ASME Code, Section XI. The staff determined that it is not necessary to develop a new deterministic ASME program for each new 10-year ISI interval; rather, the staff determined it is acceptable to compare the new proposed RI-ISI program with the last deterministic ASME program. In RR No. 4, the licensee stated that the change in risk from implementing the RI-ISI program meets the acceptability requirements of RG 1.174, Revision 2 and EPRI TR-112657, Revision B-A. In Section 3.6.1, "Quantitative Analysis," of RR No. 4, the licensee also stated that the RI-ISI results provided risk reduction in all instances. The fifth 10-year ISI update of the risk impact assessment provided in Section 3.6.1 of RR No. 4 represents CDF changes of -8.35E-07 per year for Unit 3 and -9.80E-07 per year for Unit 4, and LERF changes of -3.24E-09 per year for Unit 3 and -3.79E-09 per year for Unit 4. The licensee also provided the risk impact per system in Section 3.6.1 of RR No. 4. These values satisfy the acceptance criteria of RG 1.174, Revision 2 and EPRI TR-112657, Revision B-A when compared to the last deterministic Section XI inspection program for both the total and per system. EPRI TR-112657, Revision B-A provides guidance on an acceptable risk change of 1E-07 per year for CDF and 1E-08 per year for LERF for each system included in an application (regardless of the number of systems) and a total change less than the "very small" guidelines of 1E-06 per year for CDF and 1E-07 per year for LERF in RG 1.174, Revision 2. Therefore, the staff finds that implementation of the RI-ISI program will have an acceptable impact on risk.

Principle 4 also requires demonstration of the technical adequacy of the PRA. As discussed in RG 1.178, Revision 1 and RG 1.200, an acceptable change-in-risk evaluation (and risk-ranking evaluation used to identify the most risk significant locations) requires the use of a PRA of appropriate technical quality that models the as-built and as-operated plant.
EPRI TR-1021467-A provides guidance on the minimum acceptable quality requirement for a PRA used to support a risk-informed ISI program. The licensee stated in Section 2.2, "Turkey Point PRA History and Quality," of RR No. 4 that an industry full-scope peer review of the Turkey Point internal events PRA was performed in 2002 using the process described in NEI 00-02. The licensee stated that all facts and observations (F&Os) from this peer review have been addressed in model updates. Upon issuance of the ASME PRA Standard and RG 1.200, Revision 2, the licensee performed an internal gap analysis dated March 14, 2014, against the ASME/ANS RA-Sa-2009, as endorsed by RG 1.200, Revision 2. The licensee's response[17] to the staff's RAI 22.01 associated with the licensee's request to adopt National Fire Protection Association Standard 805 provides the results of the licensee's gap analysis against ASME/ANS RA-Sa-2009, as endorsed by RG 1.200, Revision 2.

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[17] ADAMS Accession No. ML14113A176.

Attachment A of RR. No. 4 describes two focused-scope peer reviews of the Turkey Point PRA model. A focused-scope peer review was performed for the internal events and internal flooding portions of the PRA model in April 2011. This peer review assessed the human reliability analysis elements of the standard. Another focused-peer review was performed in October 2013 to assess upgrades to the PRA model in areas of common-cause failure (CCF) analysis (level 2) and interfacing system loss-of-coolant accidents. Both focused-scope peer reviews were performed using ASME/ANS RA-Sa-2009 and RG 1.200, Revision 2. Tables 1, 2, and 3 of Attachment A to RR No. 4 provided lists of the F&Os from the 2002 peer reviews, as well as the 2011 and 2013 focused-scope peer reviews. In RR No. 4, the licensee also noted that the F&Os from the 2013 peer review had not yet been resolved in the current Turkey Point PRA model.

The staff notes that this revision of the Turkey Point PRA model has been previously reviewed and found acceptable by the staff in its safety evaluation for Amendments 263 and 258[18] regarding the relocation of various Technical Specification surveillance frequencies to a licensee controlled program.

In its letter dated July 27, 2016, the licensee responded to RAI-APLA-1, and provided supplemental information on the impact and the resolution of the remaining 2013 peer-reviewed F&Os. Finding DA-D5-01 stated that the global common cause event needs to account for the common cause combinations not included explicitly, and for several 6-component groups, the 5-of-6 term was not included, and the 6-of-6 term was not adjusted in the licensee's PRA. The licensee stated that "the common cause alpha factors were updated and the CAFTA [cutset and fault tree analysis] CCF tool was used to resolve this F&O." In Table 3 of RR No. 4, the supporting requirement associated with finding DA-D6-01 was determined to not be met because the CCF notebook did not include a review of plant failure data for common cause events. For DA-D6-01, the licensee stated that the issue was addressed in a data update and that no plant specific CCFs were found. According to Table 2-2 of EPRI TR-1021467-A, supporting requirements DA-D6 and DA-D5 only require Capability Category I for RI-ISI applications using the EPRI traditional RI-ISI approach. The staff reviewed Tables 1, 2, and 3 of Attachment A and finds that the supporting requirements associated with the F&Os meet the capability categories outlined in Table 2-2 of the EPRI TR-1021467-A for assessment of the PRA technical adequacy to support RI-ISI program implementation. Therefore, the staff has determined that Principle 4 of RG 1.174, Revision 2 is met.

Principle 5 Evaluation

In accordance with RG 1.178, Revision 1 and RG 1.174, Revision 2, implementation and performance monitoring strategies should be planned to ensure that the engineering evaluation conducted to examine the impact of the proposed changes continues to reflect the actual reliability and availability of systems that have been evaluated. When the examination of a weld under the proposed RI-ISI program is not practical or is limited because of physical constraints or radiation hazards, alternative inspection intervals, scope, and methods should be developed to ensure that piping degradation is detected and structural integrity is maintained. During its review of RR No. 4, the staff found that the licensee considered the proposed RI-ISI program as a living program. The licensee stated that its program implementation will require feedback of

[18] ADAMS Accession No. ML15166A320.

to ensure that piping degradation is detected and structural integrity is maintained. During its review of RR No. 4, the staff found that the licensee considered the proposed RI-ISI program as a living program. The licensee stated that its program implementation will require feedback of new relevant information to ensure the appropriate identification of high safety significant piping locations. At a minimum, the licensee will review the risk ranking of piping segments and update the RI-ISI program on the basis of periods that coincide with the inspection program requirements contained in the ASME Code. Significant changes may require updating the proposed RI-ISI program more frequently. Therefore, the staff determined that the licensee demonstrated that its proposed RI-ISI program is a living RI-ISI program that will be periodically reviewed and updated and that Principle 5 of RG 1.174, Revision 2 is met.

Based on its review of the licensee's application, the staff determined that the proposed RI-ISI program for the fifth 10-year ISI interval met the five key principles of risk-informed regulation and, therefore, provides an acceptable level of quality and safety.

4.0 CONCLUSION

As set forth in this safety evaluation, the staff determines that the proposed alternative in RR No. 4 provides an acceptable level of quality and safety. Accordingly, the staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the staff authorizes the use of RR No. 4 at Turkey Point for the remainder of the fifth 10-year ISI intervals. For Unit 3, the fifth 10-year ISI interval began on February 22, 2014, and is scheduled to end on February 21, 2024. For Unit 4, the fifth 10-year ISI interval began on April 15, 2014, and is scheduled to end on April 14, 2024.

All other requirements of 10 CFR 50.55a, the ASME BPV Code, Section XI, and the ASME Operation and Maintenance Code for which relief was not specifically requested and approved, remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributors: Adrienne Driver
Keith Hoffman

Date: October 26, 2016

If you have any questions regarding this issue, please contact the project manager, Ms. Audrey Klett, at (301) 415-0489 or by e-mail at Audrey.Klett@nrc.gov.

Sincerely,

/RA/

Jeanne A. Dion, Acting Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure:
Safety Evaluation

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ADAMS Accession No.: ML16293A778 ***by memorandum dated October 3, 2016**

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