

## **NRR-PMDAPEm Resource**

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**From:** Klett, Audrey  
**Sent:** Friday, November 18, 2016 3:58 PM  
**To:** Catron, Steve (Steve.Catron@fpl.com); 'Gary.Kilby@fpl.com'  
**Subject:** Request for Additional Information re. NextERA/FPL LAR to adopt TSTF-545 - CACs MF8203, MF 8204, MF8208, and MF8209

Hi Steve, Hi Gary,

By letter dated July 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16214A276), NextEra Energy Resources/Florida Power & Light Company, et al. (the licensee), submitted a License Amendment Request (LAR) for the following sites:

- Duane Arnold Energy Center
- Point Beach Units 1 and 2
- Seabrook Station
- St. Lucie Units 1 and 2, and
- Turkey Point Units 3 and 4.

The licensee requested the adoption of Technical Specifications (TS) Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-545, Revision 3, "TS Inservice Testing [IST] Program Removal & Clarify SR [Surveillance Requirement] Usage Rule Application to Section 5.5 Testing," dated October 21, 2015 (ADAMS Accession No. ML15294A555). The U.S. Nuclear Regulatory Commission (NRC)-approved TSTF-545 was made available in the *Federal Register* on March 18, 2016 (ADAMS Accession No. ML16060A162).

The staff identified that it needs additional information to complete its review. The staff's request for additional information (RAI) is below. As discussed with you on November 16, 2016, the NRC requests the licensee to respond to the request within 30 days of the date of this email.

### **RAI 1 (Point Beach, Units 1 and 2)**

The staff identified multiple instances in the TSs (e.g., SRs 3.4.10.1 and 3.6.3.4) where the text within the SRs references the "Inservice Testing Program," but the licensee proposed to revise the SR frequency to reference the "INSERVICE TESTING PROGRAM." The staff requests the licensee to either (1) submit new marked-up TS pages that replace "Inservice Testing Program" with "INSERVICE TESTING PROGRAM" and verify whether any other TSs need this correction and to submit those changes, or (2) explain why it did not propose the "Inservice Testing Program" text within the SRs to be capitalized (i.e., changed to "INSERVICE TESTING PROGRAM").

### **RAI 2 (Turkey Point, Units 3 and 4)**

The licensee proposed to revise TS 4.7.6 to read, in part, "Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of the INSERVICE TESTING PROGRAM." As discussed in an RAI dated October 18, 2016 (ADAMS Accession No. ML16292A716), for a separate LAR to change the TS Surveillance Requirements for Turkey Point Units 3 and 4, the IST program no longer appears to be applicable to snubbers because the ASME OM Code is only used for IST of pumps and valves. In the RAI dated October 18, 2016, the staff requested the licensee to revise the application by proposing to delete "in addition to the requirements of Specification 4.0.5," or to provide additional justification for retaining this phrasing in TS 4.7.6. Similarly, for this LAR dated July 28, 2016, because the proposed INSERVICE TESTING PROGRAM does not appear to be applicable to snubbers, the staff requests the licensee to either revise the proposed changes to TS 4.7.6 in its application dated July 28, 2016, or to provide additional justification for retaining this phrasing in TS 4.7.6.

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