



L-2018-053
10 CFR 54.17
10 CFR 2.390

February 16, 2018

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Re: Florida Power & Light Company
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Turkey Point Units 3 and 4 Subsequent
License Renewal Application - Supplement 2

Reference:

1. FPL Letter L-2018-004 to NRC dated January 30, 2018, Turkey Point Units 3 and 4 Subsequent License Renewal Application
2. FPL Letter L-2018-039 to NRC dated February 9, 2018, Turkey Point Units 3 and 4 Subsequent License Renewal Application - Supplement 1

Florida Power & Light Company (FPL) submitted a subsequent license renewal application (SLRA) for Turkey Point Units 3 and 4 to NRC on January 30, 2018 (Reference 1) and supplemented by Reference 2. FPL's vendor, Framatome Inc. (formerly known as AREVA Inc.) has determined that some information in the public version of the application is considered proprietary. This letter provides a Framatome affidavit for the withholding of that information from public disclosures in accordance with 10 CFR 2.390. In addition, FPL identified several editorial changes to ensure a consistent presentation of the proprietary material in the application.

Accordingly, FPL is providing the following updates to its SLRA to properly reflect the status of this information and associated changes to the enclosures to Reference 1 as listed below.

- Attachment 1 to this letter includes a revised affidavit and conforming changes to Enclosure 2, which are the applications for withholding under 10 CFR 2.390. This information supersedes the same information provided in Reference 2.
- Attachment 2 to this letter includes replacement pages for the changes to Enclosure 3, which is the Public Version of the SLRA.
- Attachment 3 to this letter includes replacement pages for the proprietary version of the SLRA. The proprietary version of the application is Attachment 1 to Enclosure 5 of the SLRA letter, which includes the documents withheld under 10 CFR 2.390.

FPL will provide a revised submittal which will include a complete version of each of the affected SLRA Enclosures identified in this letter prior to the end of the NRC acceptance review period.

AD84
NRR

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FPL requests Attachment 3 of this letter to be withheld from public disclosure under 10 CFR 2.390. The affected page markups of the FPL SLRA are covered by affidavits included with the January 30, 2018 SLRA submittal (Reference 1) Enclosure 2 Affidavits, as amended by this submittal.

If you have any questions, or need additional information, please contact William Maher, Senior Licensing Director, at 561-691-2294.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 16, 2018.

Sincerely,



William D. Maher
Senior Licensing Director
Florida Power & Light Company

Attachments:

1. Replacement Affidavit and Conforming Changes for Enclosure 2 to FPL Letter L-2018-004 dated 01-30-2018
2. Replacement Pages to the Public Version of the SLRA in Enclosure 3 to FPL Letter L-2018-004 dated 01-30-2018
3. Replacement Pages to the Proprietary Version of the SLRA in Enclosure 5, Attachment 1 to FPL Letter L-2018-004 dated 01-30-2018 Withhold under 10 CFR 2.390

WDM/RFB

cc: w/o Attachment 3

Regional Administrator, USNRC, Region II
Project Manager, USNRC, Turkey Point Nuclear Plant
Project Manager, USNRC, SLRA
Senior Resident Inspector, USNRC, Turkey Point Nuclear Plant
Project Manager, USNRC, SLRA Environment
Ms. Cindy Becker, Florida Department of Health

**Attachment 3 contains information requested to be withheld from public disclosure under 10 CFR 2.390
when separated this page is decontrolled**

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
L-2018-053 Attachment 1 (5 Total Pages)

Replacement Affidavit and Conforming Changes for Enclosure 2 to FPL Letter L-2018-004 dated 01-30-2018	
1	Enclosure 2, Attachment 6, Replace Cover Page (1 Page)
2	Enclosure 2, Attachment 6, Framatome (formerly known as AREVA Inc.) Replace Affidavit - (3 Pages)

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L-2018-004 Enclosure 2 Attachment 6 Page 1 of 4

Enclosure 2
Applications for Withholding
Proprietary Information from Public Disclosure
Pursuant to 10 CFR 2.390(a)(4)

Attachment 6:

Affidavit dated December 15, 2017 **February 15, 2018** for withholding
for Areva CUFs in SLRA tables

(Enclosure 5 Attachment 1- SLRA Section 4, Attachment 4 & Attachment 5)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Philip A. Opsal. I am Manager, Product Licensing, for Framatome Inc. (Framatome, formally known as AREVA Inc.) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by Framatome to determine whether certain Framatome information is proprietary. I am familiar with the policies established by Framatome to ensure the proper application of these criteria.

3. I am familiar with the Framatome information contained in the Section 4 of the Florida Power & Light Company, Turkey Point Nuclear Plant Units 3 and 4 Subsequent License Renewal Application, Docket Nos. 50-250 and 50-251, L-2018-004, January 2018, which is referred to herein as "Document." Certain information contained in the Tables and pages of this Document listed below has been classified by Framatome as proprietary in accordance with the policies established by Framatome for the control and protection of proprietary and confidential information.

- i. Table 4.2.2-1, "RTPTS Calculations for Turkey Point Unit 3 Extended Beltline Materials at 72 EFPY"
- ii. Table 4.2.2-2, "RTPTS Calculations for Turkey Point Unit 4 Extended Beltline Materials at 72 EFPY"
- iii. Table 4.2.3-1, "Turkey Point Unit 3 Predicted Position 1.2 USE Values at 72 EFPY"
- iv. Table 4.2.3-2, "Turkey Point Unit 4 Predicted Position 1.2 USE Values at 72 EFPY"

- v. Table 4.2.4-1, "Turkey Point Unit 3 ART Calculations for 72 EFPY"
- vi. Table 4.2.4-2, "Turkey Point Unit 4 ART Calculations for 72 EFPY"
- vii. Table 4.3-1, "PTN Unit 3 and Unit 4 60-Year Fatigue Cumulative Usage Factors for Reactor Coolant System Components,"
- viii. Table 4.3.3-2, "80-Year Environmentally Assisted Fatigue CUFs," and
- ix. Pages 4.3-22, 4.3-23 and 4.3-24 of Section 4, "Time-Limited Aging Analyses,"

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by Framatome and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by Framatome to determine whether information should be classified as proprietary:

- (a) The information reveals details of Framatome's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for Framatome.

- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(d) and 6(e) above.

7. In accordance with Framatome's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside Framatome only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Framatome policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

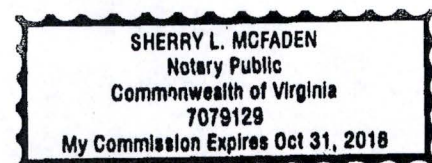
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Philip A. Osol

SUBSCRIBED before me this 15th
day of February, 2018.

Sherry L. McFaden

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/18
Reg. # 7079129



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when separated this page is decontrolled**

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
L-2018-053 Attachment 2 (14 Total Pages)

**Replacement Pages to the Public Version of the SLRA in Enclosure 3 to FPL Letter
L-2018-004 dated 01-30-2018**

1

Enclosure 3, SLRA Section 4,
Replace the following pages listed below with the attached pages:
4.2-7
4.2-8
4.2-9
4.2-10
4.2-16
4.2-18
4.2-21
4.2-22
4.2-23
4.3-5
4.3-22
4.3-23
4.3-24