



April 3, 2018

L-2018-068
10 CFR 50.75(f)(1)
10 CFR 72.30(b)(c)(1) (4)

Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Docket No. 72-61

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Docket No. 72-62

NextEra Energy Seabrook, LLC
Seabrook Station
Docket No. 50-443
Docket No. 72-63

NextEra Energy Duane Arnold, LLC
Duane Arnold Energy Center
Docket No. 50-331
Docket No 72-32

NextEra Energy Point Beach, LLC
Point Beach Units 1 and 2
Docket Nos. 50-266, 50-301
Docket No. 72-05

Response to Request for Additional Information Regarding Florida Power & Light/NextEra
Decommissioning Funding Plan Updates for Independent Spent Fuel Storage Installations

References:

1. Florida Power & Light Company letter L-2015-064, Decommissioning Funding Status Reports/Independent Spent Fuel Storage Installation (ISFSI) Financial Assurance Update, March 27, 2015 (ADAMS Accession No. ML15090A114)
2. NRC Letter, Request for Additional Information Regarding Florida Power and Light/NextEra Decommissioning Funding Plan Updates for St. Lucie, Units 1 and 2; Seabrook Station; Duane Arnold Energy Center; and Point Beach, Units 1 And 2 Independent Spent Fuel Storage Installations, dated February 27, 2018 (ADAMS Accession No. ML18058A053)
3. Florida Power & Light Company letter L-2017-040, Decommissioning Funding Status Reports/Independent Spent Fuel Storage Installation (ISFSI) Financial Assurance Update, March 30, 2017 (ADAMS Accession No. ML17130A921)

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By letter dated March 27, 2015 (L-2015-064), Florida Power and Light Company (FPL) submitted Reference 1, the Decommissioning Funding Status Reports/Independent Spent Fuel Storage Installation (ISFSI) Financial Assurance Update cost estimates for its reactors, and as agent for NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC.

On February 27, 2018, the NRC staff issued Reference 2, requesting additional information in order to complete its review. The response to Reference 2 is provided in the enclosure to this letter.

The enclosure to this letter contains responses to the NRC requests for additional information for each of the below referenced stations. Please note that the enclosed information is also applicable to the most recently submitted ISFSI decommissioning cost estimates in Reference 3.

In reference to this request, CAC No. 001028, the EPID numbers are as listed below for each ISFSI:

ISFSI	EPID
St. Lucie Units 1 and 2	L-2017-FPR-0061
Turkey Point Units 3 and 4	L-2017-FPR-0070
Seabrook Station	L-2017-FPR-0063
Duane Arnold Energy Center	L-2017-FPR-0023
Point Beach Units 1 and 2	L-2017-FPR-0055

This letter contains no new commitments and no revisions to existing commitments.

Should there be any questions, please contact Steve Catron at (561) 304-6206.



Larry Nicholson
Nuclear Licensing and Regulatory Compliance Director

Enclosure (1)

Enclosure

Regulatory Requirement

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 72.30(c), at the time of license renewal and at intervals not to exceed 3 years, the decommissioning funding plan (DFP) required to be submitted by 10 CFR 72.30(b) must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. The DFP must update the information submitted with the original or prior approved plan. In addition, the DFP must also specifically consider the effect of the following events on decommissioning costs, as required by 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

Background

By letter dated March 27, 2015, Florida Power and Light/NextEra Energy submitted for U.S. Nuclear Regulatory Commission (NRC) staff review and approval, DFP updates for the independent spent fuel storage installations at St. Lucie Units 1 and 2; Seabrook Station; Duane Arnold Energy Center; and Point Beach Units 1 and 2 (Agencywide Documents Access and Management System Accession No. ML 15090A114). The NRC staff reviewed Florida Power and Light/NextEra's DFP updates for each ISFSI and believes Florida Power and Light/NextEra's submittal was not sufficient to meet the intent of the requirement in 72.30(c). Specifically, the DFP updates do not provide sufficient information to allow the NRC to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered.

RAI1

For each ISFSI, provide a revised DFP that includes information on the occurrence, and the effect on decommissioning costs, of each of the events listed in 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

NextEra Response

Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC (jointly referred to as "NextEra") submitted initial ISFSI decommissioning funding plans on December 17, 2012 (Reference 1). On May 23, 2014, the NRC requested additional information from NextEra (Reference 2), and on August 12, 2014, NextEra responded to the RAI (Reference 3). This response included entirely new ISFSI decommissioning funding cost estimates for each fleet ISFSI.

In March 2015, NextEra submitted a biennial reactor decommissioning funding report required by 10 CFR 50.75 (Reference 4). NextEra also submitted its triennial 10 CFR 72.30 ISFSI decommissioning funding plans at that time. Because NextEra had recently submitted new ISFSI decommissioning funding plans, it did not commission entirely new ISFSI decommissioning cost estimates in March 2015. Instead, following the guidance in Regulatory Guide 1.159, section 1.F "Adjustments to Cost Estimates," NextEra escalated its existing ISFSI decommissioning cost estimates to account for inflation.

Enclosure

The following tables supplement the 2015 ISFSI decommissioning funding plan to address new information that may affect the previously submitted reports in accordance with 10 CFR 72.30(c)(1-4).

Turkey Point (*Florida Power & Light Company*)

Spills of radioactive material producing additional residual radioactivity in onsite subsurface material	None
Facility modifications	None
Changes in authorized possession limits	None
Actual remediation costs that exceed the previous cost estimate	None

St. Lucie (*Florida Power & Light Company*)

Spills of radioactive material producing additional residual radioactivity in onsite subsurface material	None
Facility modifications	None
Changes in authorized possession limits	None
Actual remediation costs that exceed the previous cost estimate	None

Seabrook (*NextEra Energy Seabrook, LLC*)

Spills of radioactive material producing additional residual radioactivity in onsite subsurface material	None
Facility modifications	None
Changes in authorized possession limits	None
Actual remediation costs that exceed the previous cost estimate	None

Duane Arnold (*NextEra Energy Duane Arnold, LLC*)

Spills of radioactive material producing additional residual radioactivity in onsite subsurface material	None
Facility modifications	None
Changes in authorized possession limits	None
Actual remediation costs that exceed the previous cost estimate	None

Enclosure

Point Beach (*NextEra Energy Point Beach, LLC*)

Spills of radioactive material producing additional residual radioactivity in onsite subsurface material	None
Facility modifications	None
Changes in authorized possession limits	None
Actual remediation costs that exceed the previous cost estimate	None

On March 30, 2017, NextEra again submitted decommissioning funding status reports and new ISFSI decommissioning cost estimates (Reference 5). NextEra affirms that the above tables indicating no changes for the criteria found in 10 CFR 72.30(c)(1-4) remain applicable for the 2017 cost estimates.

References

1. FPL Letter L-2012-442, "ISFSI Decommissioning Funding Plans," dated Dec. 17, 2012 (ADAMS Accession No. ML12354A134).
2. NRC Letter, "Request for Additional Information for Review of the Decommissioning Funding Plans for Florida Power and Light and NextEra Energy Independent Spent Fuel Storage Installations," dated May 23, 2014 (ADAMS Accession No. ML14143A141).
3. FPL Letter L-2014-214, "Reply to Request for Additional Information for Review of the Decommissioning Funding Plans Regarding the Independent Spent Fuel Storage Installations," dated Aug. 12, 2014 (ADAMS Accession No. ML14225A655).
4. FPL Letter L-2015-064, "Decommissioning Funding Status Reports / Independent Spent Fuel Storage Installation (ISFSI) Financial Assurance Update," dated Mar. 27, 2015 (ADAMS Accession No. ML15090A114).
5. FPL Letter L-2017-040, "Decommissioning Funding Status Reports / Independent Spent Fuel Storage Installation (ISFSI) Financial Assurance Update," dated Mar. 30, 2017 (ADAMS Accession No. ML17093A722).