NRC Pre-Submittal Meeting

St. Lucie and Turkey Point Nuclear Plants

IMPROVED TECHNICAL SPECIFICATION Conversion

March 22, 2021

St. Lucie and Turkey Point ITS Conversion Pre-Submittal Meeting

Agenda

- Introduction
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  - Benefits
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  - ITS Project Phased Approach
  - Aspects of LAR Development
  - Current Status of LAR
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Agenda (continued)

- Discussion Topics
  - Beyond Scope Changes
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  - Parallel LAR Submittals
  - NRC Resources and 2021/2022 Schedule Support
  - Implementation Activities

- ITS Submittal and Implementation Schedules
- Projected Timeline of ITS Conversion Submittals

St. Lucie and Turkey Point ITS Conversion Pre-Submittal Meeting

Introduction

Purpose of Meeting

Given the complexity of ITS Conversions, this meeting is intended to ensure common understanding of the ITS Conversion process and therefore allow for a more efficient use of both NRC and FPL resources.

Introduction (continued)

Licensee Attendees:

- FPL
  - William Maher – ITS Project Manager
  - Jarrett Mack – Corporate Licensing Core Team
  - Robert Pell – Turkey Point Point of Contact
  - David Stoia– Turkey Point Site Licensing
  - Fred Pollak – St. Lucie Point of Contact
  - Ken Frehafer– St. Lucie Site Licensing
- EXCEL Services
  - Gregg Ellis – Project Oversight Director/ St. Lucie Project Lead, Consultant
  - Charles DeDeaux – Turkey Point Project Lead, Consultant

Project Description

Benefits

ITS Conversion is a priority, and the sites recognize the Key Benefits which include:

- Fleet Standardization, enhanced safety, operational, and regulatory performance
- Significantly improved TS Bases, including alignment of the TS Bases with St. Lucie/Turkey Point Current Licensing Bases
- Adoption of the TS Rules of Usage Sections in Chapter 1 of the Improved Standard Technical Specifications (ISTS)

Key Benefits include enhanced safety performance and enhanced bases for the TS requirements

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Project Description (continued)

Overview

Current TS are based on pre-ITS Standard Technical Specifications

- St. Lucie contains separate Specifications for Units 1 and 2
- St. Lucie Current TS are based on NUREG-0212 originally licensed in 1976 (U1)/1983 (U2)
- Turkey Point contains combined Specifications for Units 3 and 4
- Turkey Point Current TS are based on NUREG-0452 originally licensed in 1972 (U3)/1973 (U4)

St. Lucie units have separate Technical Specifications for each unit
Turkey Point units have one set of Technical Specifications for both units

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Project Description (continued)

Scope

Convert the Site Current Technical Specifications (CTS) to Revision 5 (latest revision) of the Improved Standard Technical Specifications (ISTS)

- Turkey Point – NUREG-1431
- St. Lucie – NUREG-1432

Several Risk Informed Initiatives already adopted at both sites – to be discussed in more detail

ITS Conversion to latest ISTS – Revision 5
Both sites have already adopted several risk informed initiatives

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Project Description (continued)

ITS Project Phased Approach

- Phase 1 Initial Planning - complete
- Phase 2 LAR Development (both Turkey Point and St. Lucie) – schedule for completion Fall 2021
- Phase 3 NRC Review and Approval - Targeted to begin Late Fall 2021
- Phase 4 Implementation - Target - Fall 2022

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Project Description (continued)

Aspects of LAR Development

- Approach - Development of the St. Lucie and Turkey Point ITS Conversion LAR followed:
  - TSTF-GG-13-01 ITS Conversion Guidance
  - FPL LAR process
- Each Plant ITS Submittal Contains
  - Current Tech Spec markup
  - Discussion of Changes
  - ISTS and ISTS Bases markup
  - Justification for Deviation from the ISTS
  - No Significant Hazard Consideration
  - Supporting Information as required

ITS Conversions Packages are arranged consistent with previous ITS Conversion submittals

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Project Description (continued)

Aspects of LAR Development (continued)

- Approved Travelers Adopted since ISTS NUREG Rev. 5
  - None expected for either St. Lucie or Turkey Point

- Risk Informed Initiatives
  - TSTF-425 – Incorporated as part of ISTS Rev. 5
    - -- Both St. Lucie and Turkey Point have adopted the Surveillance Frequency Control Program (SFCP). Therefore, the ITS Conversion reflects the CTS adoption of this program with one exception:
    - -- ITS proposes to relocate periodic frequencies specified in Section 5.5 programs to the SFCP consistent with several other plants.

Both St. Lucie and Turkey Point have adopted a Surveillance Frequency Control Program

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Project Description (continued)

- Aspects of LAR Development (continued)

  - Risk Informed Initiatives (continued)
    - TSTF-427 – Incorporated as part of ISTS Rev. 5
    - A new Technical Specification Limiting Condition for Operation (LCO) Applicability rule, LCO 3.0.9, and its associated Bases, has been provided to address non-technical specification degraded barriers that cannot provide their protective function(s) for Technical Specification systems.
    - Both St. Lucie and Turkey Point are proposing to adopt LCO 3.0.9.

Both St. Lucie and Turkey Point are proposing to adopt LCO 3.0.9 – Hazards Barrier Rule of Usage

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Project Description (continued)

Aspects of LAR Development (continued)

- Risk Informed Initiatives (continued)
  - TSTF-505 – Incorporated as part of ISTS Rev. 5
    - Both facilities have adopted the TSTF and include a Risk Informed Completion Time Program. Therefore, the ITS Conversion reflects the CTS adoption of this program
    - Turkey Point has fully adopted TSTF-505
    - St. Lucie has adopted TSTF-505 and excluded RICTs on Inverters and electrical distribution Specifications
    - St. Lucie is pursuing a separate license amendment to adopt a RICT for the Inverters. ITS project will track this parallel submittal and update the ITS submittal upon approval of this license amendment. Change would not pose a significant impact to the Tech Spec Branch Electrical Review

Both St. Lucie and Turkey Point have adopted a Risk Informed Completion Time Program

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Project Description (continued)

Current Status of LARs

- Drafting final ITS sections
- Verification of validation sources is in progress per the FPL LAR process
  - Core Team at Turkey Point and St. Lucie (Ops, Licensing, Engineering, including Safety Analysis)
- Turkey Point and St. Lucie ORG subcommittee package reviews are in progress
- Corporate counsel package reviews are in progress

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Project Description (continued)

NRC Review and Approval Support

-- Acceptance Review
  - Information, if any, not provided under oath or affirmation
  - Acceptance Review Meeting(s)

-- Main Review Phase
  - Anticipate Staff utilizing LIC-601 NRR Office Instruction
  - RAI Communications and Use of electronic Dedicated Reading Room

-- Issue Resolution and Submission of Revisions by Licensee

-- SE Preparation, Document Routing, and Issuance

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Discussion Topics

Beyond Scope Changes

- There are a few changes that have been identified as possible beyond scope changes as defined in LIC 601. FPL does not believe any of the changes will require Formal Technical Branch Review.
- See Appendix at end of presentation for listing of potential beyond scope changes
- Licensee Identified Items Requiring Formal Technical Branch Review

  -- One possible PTN change – discussed later

Sensitive or Proprietary Information

- None identified

No "beyond scope" changes requiring Technical Branch staff review is anticipated
No sensitive or proprietary information is anticipated

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Discussion Topics (continued)

Parallel LAR Submittals

St. Lucie Near Term LAR Submittals

- 120v AC Inst Bus RICT (ML20356A162), submitted 12/21/20

Turkey Point Near Term LAR Submittals

- Adoption of FSLOCA Methodology – Regulatory commitment to submit April 2021
- Safety System Digital Upgrade – submittal anticipated June 2021

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Discussion Topics (continued)

NRC Resources and 2021/2022 Schedule Support

- FPL is making a concerted effort to keep changes “in-scope” and will provide an updated list at the time the LAR is submitted of those items that may require formal technical branch review. As stated, one anticipated at this time.

- ITS implementation date anticipated to occur within 6 months following issuance of the ITS Amendment Safety Evaluation (SE).

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Discussion Topics (continued)

Implementation Activities

- Following LAR submittal, FPL will begin revising programs, UFSAR, and procedures
- St. Lucie will relocate Technical Requirements from UFSAR Chapter 13 and develop a stand-alone Technical Requirements Manual (TRM) and add proposed CTS relocated items
- Turkey Point will generate a TRM for CTS relocated items

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Discussion Topics (continued)

Implementation Activities

- Training of plant operators is targeted to begin approximately first quarter of 2022
- Training of operators will be complete prior to ITS Implementation consistent with other ITS Conversion Projects

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ITS Submittal and Implementation Schedules

- PTN and PSL are expected to be submitted simultaneously in September 2021
- **Approval expected in August/September 2022**
- **Implementation expected following PSL U1 Fall 2022 outage (outage completion expected October 2022)**

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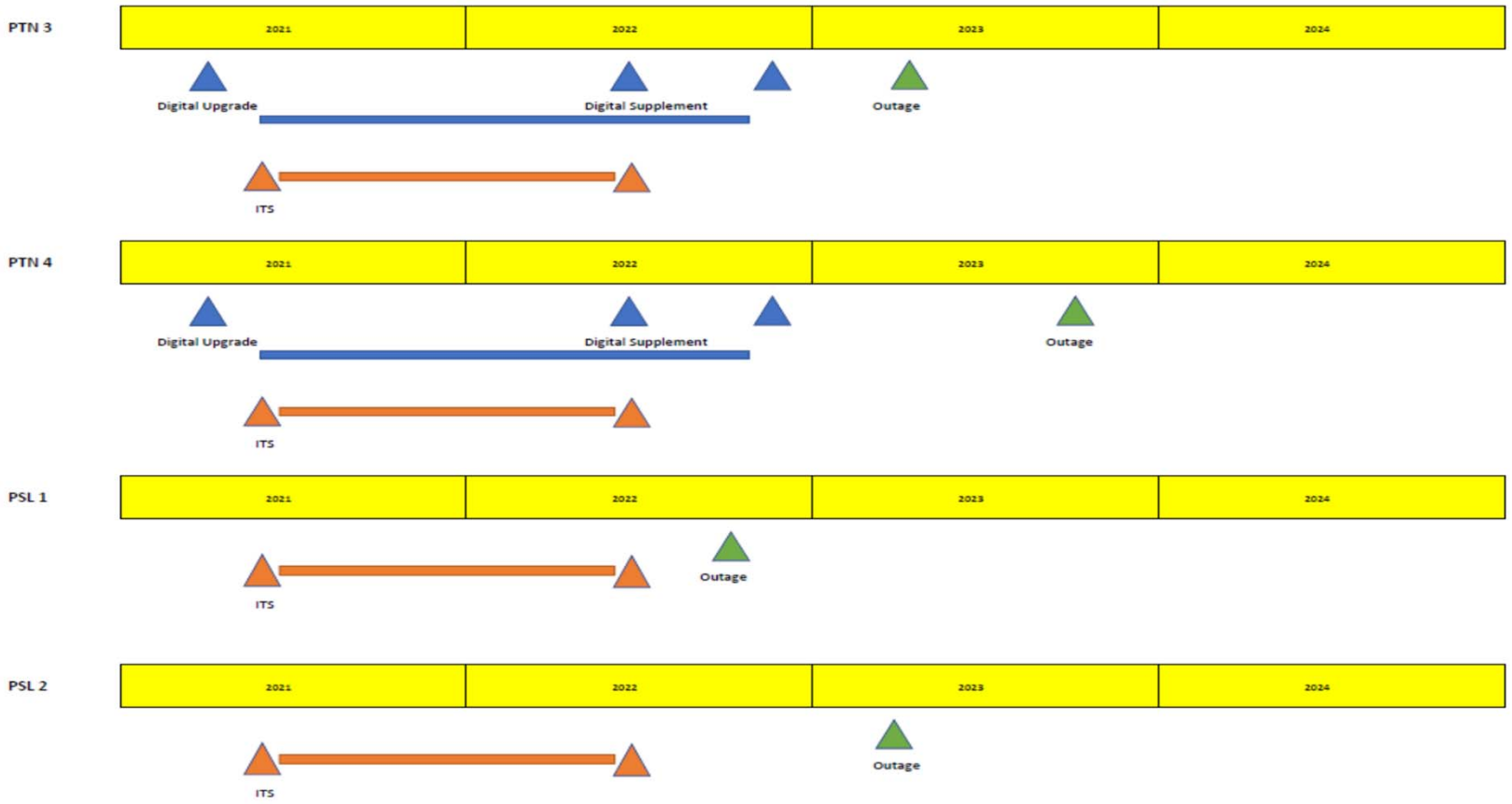
Projected Timeline of ITS Conversion Submittals



Questions

We look forward working with you and your ITS Conversion Review team
Thank you very much for your time and participation

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Appendix
Potential Beyond Scope Change Not Requiring Technical Branch Review

St. Lucie (PSL)

- Increasing required U1 DG fuel oil volume from 3.5 days per DG to 7 days storage inventory for at least one U1 DG – More restrictive change consistent with current licensing basis.
  - Technical Branch Review not anticipated.
- U2 RCP Flywheel Program restoring previously approved program requirements in addition to current requirements based on the RCP Flywheel material. Both methods approved by the NRC for PSL U2.
  - Technical Branch Review not anticipated.
- ITS Section 5.5. Programs containing periodic frequencies are proposed to be relocated to the Surveillance Frequency Control Program (SFCP). This deviation from ISTS Rev. 5 and TSTF-425 has been previously approved for at least four (4) plants. PSL currently has an approved SFCP.
  - Technical Branch Review not anticipated

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Appendix
Potential Beyond Scope Change Not Requiring Technical Branch Review

Turkey Point (PTN)

- ITS Section 5.5. Programs containing periodic frequencies are proposed to be relocated to the Surveillance Frequency Control Program (SFCP). This deviation from ISTS Rev. 5 and TSTF-425 has been previously approved for at least four (4) plants. PTN currently has an approved SFCP.
  - Technical Branch Review not anticipated
- ITS 3.4.5, RCS Loops - MODE 3, LCO requires the existing CTS requirements to be incorporated. CTS 3.4.1.2, RCS HOT STANDBY, requires three loops OPERABLE and three loops in operation. FPL proposing to change the LCO to require three loops Operable and two loops in operation; consistent with the current Safety Analysis.
  - Potential Technical Branch Review anticipated