



# **Turkey Point Unit 3 and Unit 4**

## **Reactor Protection System Engineered Safety Feature Actuation System Nuclear Instrumentation System Replacements**

**Safety System Replacement Project LAR  
NRC 6th Pre-submittal Meeting Telecon**

**July 22, 2021**

**OPEN MEETING**

# Agenda – Open and Closed Sessions

- **Open Session**

- FPL License Amendment Request (LAR) Submittals
- Vendor Oversight Plan Update and Detail Discussion
- Next Pre-submittal Meeting Agenda Items

- **Closed Session**

- Diverse Actuation System (DAS) Architecture and Reliability
- Leak-Before-Break Discussion on D3
- Modification Code Year Discussion for LAR

# Introductions – Project Team

- **FPL Nuclear Licensing**
  - Steve Catron – Licensing Fleet Manager
  - Jarrett Mack – Fleet Licensing Lead
  - David Stoia – Turkey Point Site Licensing Lead
  - Bill Maher – Improved Technical Specification Project Director
- **FPL Nuclear Engineering**
  - Brian Dunn – Fleet Design Director
  - Phil Barnes – Design Engineering Manager
  - Wes Frewin – Fleet Digital Design Supervisor
  - Warren Busch – Project Engineer
  - Phillip Tiemann – Fuels / Safety Analysis
- **Framatome**
  - Ron Legrand – Project Manager
  - Brian Haynes – Licensing Lead
  - Taha Abdelnaeem - Engineering Lead
  - Ted Quinn – Licensing Engineer
  - Jerry Mauck – Licensing Engineer
  - Ron Jarrett – Licensing Engineer
  - Bill Hannaman – Licensing Engineer
  - Michael Howard – Safety Analysis
  - Tom Geary – Design Engineering
- **Sargent & Lundy -Third Party Review**
  - Pareez Golub

# FPL LAR Submittals

- **Follow-up to remarks on resource and schedule challenges**
  - 3 submittals under NRC review concurrently for PTN; two apply to PTN for ITS and RPS/ESFAS System Replacements
- **Improved Standard Technical Specification (ITS)**
  - Changes within scope of NUREG 1431, Rev. 5
  - Regular communications with NRC TS Branch on scope control
- **RPS/ESFAS System Replacements**
  - LAR approval Fall 2022 provides confidence in planning for PTN Unit 3 Spring 2023 outage. FPL supports:
    - Minimize applications that are first time NRC reviews
    - Frequent interaction before submittal and during reviews
    - Quick turnaround on requests for information
    - Open to discuss other time-savings measures

# Vendor Oversight Plan Status Update

- **Plan issued, currently Revision 0, LAR summary in draft**
- **Oversight of Framatome issued documents in progress**
  - Documented in comment resolution forms
  - Traceable transmittals between Framatome and FPL
  - Review task reconciling with production schedule activities
- **Audits and Inspections performed**
  - Performed at Lynchburg and Mansfield facilities
  - Quality Assurance initial program audits
  - Cyber Security inspection of Secure Development Environment
  - Documented in Quality Assurance Reports

# Vendor Oversight Plan and Summary Level of Detail

Document Type	Intended Process	Level of detail intended to support
LAR Summary	Docketed, revised only upon deviation	<ul style="list-style-type: none"> <li>• Basis for safety evaluation determinations</li> <li>• Threshold for NRC notification of changes</li> </ul>
Vendor Oversight Plan (VOP)	Available, updated during project	<ul style="list-style-type: none"> <li>• Basis for VOP LAR summary</li> <li>• Planning of oversight activities, schedule Identifiers</li> <li>• Document performed activities, roadmap</li> </ul>
Implementation	Inspection, FPL maintained documents	<ul style="list-style-type: none"> <li>• Specific document number and revision</li> <li>• Specific reviewers</li> <li>• Comments and resolutions/acceptance</li> <li>• Corrective Action Program (not affecting LAR summary)</li> </ul>

# Vendor Oversight Plan Summary Detail (1 of 2)

Criteria/Content	Evaluated for LAR Change (examples)	Not impacting LAR summary
Organization Procedure structure	<ul style="list-style-type: none"> <li>• Changes of oversight responsibility to different organization</li> <li>• Oversight required outside the procedure structure</li> </ul>	<ul style="list-style-type: none"> <li>• Changes to personnel in defined roles</li> <li>• Delegation of activities</li> </ul>
Scope of Activities	<ul style="list-style-type: none"> <li>• Document or task of a type listed in the summary is removed from scope of review</li> <li>• Addition of a significant document or task of a type not in summary</li> <li>• Changes to the LAR that warrant update of VOP Summary</li> </ul>	<ul style="list-style-type: none"> <li>• Adding documents or tasks of a type listed</li> <li>• Document revisions</li> <li>• Changes to schedule</li> <li>• Combination of documents into fewer</li> </ul>
Methods	<ul style="list-style-type: none"> <li>• Use of other than QA audits, comment resolution forms, reports with FPL approval, or the corrective action program to document oversight</li> <li>• Change to a procedure that effects responsibility or relaxes acceptance criteria for an oversight task</li> </ul>	<ul style="list-style-type: none"> <li>• Transmittal of oversight related information or results to vendor</li> <li>• Procedure revisions that do not affect scope or acceptance criteria</li> </ul>

## Vendor Oversight Plan Summary Detail (2 of 2)

Criteria/Content	Evaluated for LAR Change (examples)	Not impacting LAR summary
Acceptance criteria	<ul style="list-style-type: none"><li>• If oversight activities cannot be performed to completion or comprehensive of scope for software development activities</li><li>• If vendor conformance to LAR stated implementation cannot be achieved.</li></ul>	<ul style="list-style-type: none"><li>• Justified changes to code and standards applicable to a document</li><li>• Changes to document specific acceptance criteria</li></ul>
Corrective Action	<ul style="list-style-type: none"><li>• Corrective Action Program used to determine what actions necessary.</li></ul>	<ul style="list-style-type: none"><li>• CR for defect in a document found after document issued final</li><li>• CR to document the performance/results of an oversight activity</li></ul>

end of topic



# **Future Pre-submittal Meeting Recommended Agenda Items**

- **Open items**
- **Equipment replacement scope outside Tricon SER**
- **Command Prioritization**
- **Commercial grade dedication/qualification status**
- **Human Factors Engineering and simulator schedule**
- **Implementation Items**
- **Attachments to the LAR**

**Thank you!**

**Questions/Comments?**