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J. O'Brien

Florida Power & Light Company, P. O. Box 14000, Juno Beach, FL 33408-0420

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US NRC

64FR 66213
Nov. 24, 1999

(13)

Mr. David L. Meyer, Chief
Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: **Revised Criteria for Post Accident Sampling Systems
November 24, 1999, 64 Fed. Reg. 66213**

Dear Mr. Meyer:

Florida Power & Light Company (FPL), the owner and operator of the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, provides the following on the above-referenced request for comments. FPL supports the action taken by both the Combustion Engineering Owners Group (CEOG) and Westinghouse Owners Group (WOG) for the elimination of the current requirements for the Post Accident Sampling System (PASS).

The technical basis for eliminating the PASS developed by both the WOG and the CEOG underwent extensive regulatory review by the NRC. The Advisory Committee on Reactor Safeguards (ACRS), which is an independent regulatory review group, also reviewed the technical basis developed by both the WOG and the CEOG. At the conclusion of their review, the ACRS recommended that the NRC eliminate the regulatory requirements for the PASS.

The WOG and the CEOG, as well as the ACRS have determined that there is no decrease in emergency planning effectiveness as a result of eliminating the regulatory requirements to maintain a dedicated PASS at each plant. As a result, the information available to state and local emergency response organizations for formulating offsite radiological protection activities will not be adversely impacted by the elimination of the PASS.

The elimination of PASS requirements will result in reduced personnel exposure at the plant due to the elimination of maintenance and surveillance requirements associated with the system. Additional benefits include the elimination of a potential post-accident leakage path and the availability of expert resources that would otherwise be diverted to PASS activities of marginal value.

Added: J. O'Brien

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FPL also endorses the comments submitted by the Nuclear Energy Institute.

We appreciate the opportunity to comment on the "Revised Criteria for Post Accident Sampling Systems."

Sincerely,

A handwritten signature in black ink, appearing to read "R. John Gianfrancesco, Jr." with a stylized flourish at the end.

R. John Gianfrancesco, Jr.
Manager
Administrative Support and Special Projects