



10 CFR 50.4
L-2012-004
January 4, 2012

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Response to NRC Request for Additional Information Regarding Bulletin 2011-01,
Mitigating Strategies

- References:
- 1) NRC Bulletin 2011-01, Mitigating Strategies, dated May 11, 2011
 - 2) FPL Letter L-2011-261 dated July 8, 2011, 60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies
 - 3) NRC Letter dated December 5, 2011: Turkey Point, Units 3 and 4 - Request for Additional Information Regarding 60-Day Response to Bulletin 2011-01, "Mitigating Strategies" (TAC Nos. ME6494 and ME6495)

The Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, Mitigating Strategies, dated May 11, 2011 (Reference 1), to request each licensee to provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2).

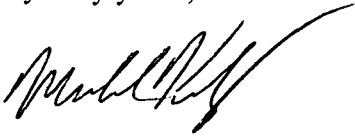
In Bulletin 2011-01, the NRC requested each licensee to submit written responses within 30 and 60 days of the date of the Bulletin. Florida Power and Light Company (FPL) provided the 60-day response for Turkey Point Units 3 and 4 in FPL Letter L-2011-261 dated July 8, 2011 (Reference 2).

The attachment to this letter forwards FPL's reply to the NRC request for additional information (Reference 3) regarding FPL's 60-day Bulletin response. The attachment contains information that addresses measures that are currently in place. There are no new regulatory commitments contained in this letter.

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NRA

If there are any questions, or if additional information is required, please contact Robert J. Tomonto, Licensing Manager, at 305-246-7327.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael Kiley", with a long, sweeping flourish extending to the right.

Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachment: Response to NRC Request for Additional Information Regarding Bulletin 2011-01, Mitigating Strategies

cc: Regional Administrator, USNRC, Region II
Senior Resident Inspector, USNRC, Turkey Point Nuclear Plant

**Response to NRC Request for Additional Information
Regarding Bulletin 2011-01, Mitigating Strategies**

Turkey Point Nuclear Plant

On May 11, 2011, the NRC issued Bulletin 2011-01 'Mitigating Strategies' (Reference 1). In Bulletin 2011-01, the NRC requested each licensee to submit written responses within 30 and 60 days of the date of the Bulletin. Florida Power and Light Company (FPL) provided the 60-day response for Turkey Point Units 3 and 4 in FPL Letter L-2011-261 dated July 8, 2011 (Reference 2).

By letter dated December 5, 2011 (Reference 3), the NRC requested additional information regarding FPL's 60-day Bulletin response. FPL's reply to the NRC request for additional information is contained below.

NRC Request

1. Describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment supporting the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases. The U. S. Nuclear Regulatory Commission (NRC) staff could not determine if you performed maintenance and testing activities to ensure that these devices will be functional when needed.

FPL Response

Monitor and spray nozzles are passive components and are checked quarterly for evident signs of corrosion or damage. Testing is not routinely performed.

Other equipment supporting mitigating strategies include hand loaders for valve operators, flange adapters and flow instruments. These are checked quarterly for evident signs of corrosion or damage. Instruments are routinely calibrated. Testing is not routinely performed.

NRC Request

2. Describe in detail the testing of radio communications equipment to ensure that it is functional when needed.

The bulletin requested that each licensee describe in detail the maintenance and testing of equipment supporting the mitigating strategies to ensure that it will be functional when needed. Communications equipment needed to support the mitigating strategies was described in the NRC Safety Evaluation (SE) documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026). The SE states that you installed and tested an Interoperability Radio System and that radios are maintained and tested using plant procedures. However, based upon your response to the bulletin, the NRC staff could not determine if you continue to perform activities to ensure that radio communications equipment will be functional when needed.

FPL Response

Radios are stored on charge and are functionally tested quarterly, consistent with emergency preparedness guidance.

NRC Request

3. Describe in detail how you assure the availability of Homestead Air Reserve Base to provide offsite support in response to a B.5.b event.

The bulletin requested that each licensee describe in detail how it assures the availability of offsite support, including a listing of offsite organizations relied upon for emergency response. The NRC Safety Evaluation documenting the NRC review of your response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026) states that the Homestead Air Reserve Base has the required knowledge, skills, and abilities to support response actions and that you were pursuing a letter of agreement. Homestead Air Reserve Base was not listed in your response to Question 5 of the bulletin.

FPL Response

The response to Question 5 of the bulletin only listed those outside organizations that were identified in earlier correspondence and from whom formal mutual aid agreements had been obtained. The pursuit to obtain a Letter of Agreement or other formal confirmation of mutual aid with Homestead Air Reserve Base has been unsuccessful.

References

1. NRC Bulletin 2011-01, Mitigating Strategies, dated May 11, 2011
2. FPL Letter L-2011-261 dated July 8, 2011, 60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies
3. NRC Letter dated December 5, 2011: Turkey Point, Units 3 and 4 -Request for Additional Information Regarding 60-Day Response to Bulletin 2011-01, "Mitigating Strategies" (TAC Nos. ME6494 and ME6495)