



L-2014-276
10 CFR 50.90
October 7, 2014

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Renewed Facility Operating License Nos. DPR-31 and DPR-41
License Amendment Request No. 234
Change to Cyber Security Plan Milestone 8 Completion Date

References:

1. Florida Power & Light Company (FPL) letter L-2011-121 to the USNRC, "License Amendment Request No. 203B, Supplement to Request for Approval of the Turkey Point Nuclear Generating Station Cyber Security Plan: Response to Request for Additional Information," April 5, 2011.
2. FPL letter L-2012-248 to the USNRC, "License Amendment Request – Cyber Security Plan Implementation Schedule Milestone Change," June 13, 2012.
3. J. Paige (USNRC) letter to M. Nazar (FPL), "Turkey Point Units 3 and 4 – Issuance of Amendments Regarding Cyber Security Program (TAC Nos. ME4549 and ME4550)," July 29, 2011.
4. T. Orf (USNRC) letter to M. Nazar (FPL), "Turkey Point Plant, Units 3 and 4 – Issuance of Amendments Regarding Revision to Cyber Security Plan Milestone 6 (TAC Nos. ME8879 AND ME8880)," December 17, 2012.

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) hereby requests to amend the implementation schedule for the Cyber Security Plan (CSP) for Turkey Point Units 3 and 4. The CSP and implementation schedule were previously provided in References 1 and 2 and approved by the NRC in References 3 and 4.

Attachment 1 transmitted herewith contains ~~security-related information to be withheld under 10 CFR 2.390~~. When separated from this transmittal, the remaining transmittal document is decontrolled.

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Florida Power & Light Company
Application to Change Milestone 8 Completion Date

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FPL considers Attachment 1 of this application to be sensitive security information and requests that it be withheld from public disclosure pursuant to 10 CFR 2.390. The proposed change is a request to revise the completion date (Milestone 8) of the CSP implementation schedule.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using the criteria in 10 CFR 50.92(c) and it has been determined that the change involves no significant hazards consideration.

FPL requests approval of this application within one (1) year of receipt and once approved, the amendments will be implemented within 60 days. This letter contains no new commitments and no revisions to existing commitments.

The proposed change has been reviewed by the Plant Nuclear Safety Committee. Pursuant to 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designated State of Florida official.

Should you have any questions regarding this submission, please contact Mr. Robert J. Tomonto at 305-246-7327.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: 10/7/14

Very truly yours,



Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachments: 1) Analysis of Proposed Change to Renewed Facility Operating Licenses
2) Regulatory Evaluation
3) Proposed Renewed Facility Operating License Change (marked-up pages)

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant
Ms. Cynthia Becker, Chief - Florida Bureau of Radiation Control

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Attachment 2

Regulatory Evaluation

1. REGULATORY EVALUATION

- 1.1 Applicable Regulatory Requirements/Criteria
- 1.2 No Significant Hazards Consideration Determination
- 1.3 Conclusions

2. ENVIRONMENTAL CONSIDERATION

1.0 REGULATORY EVALUATION

1.1 Applicable Regulatory Requirements/Criteria

10 CFR 73.54 requires licensees to maintain and implement a Cyber Security Plan (CSP). Turkey Point Units 3 and 4 Renewed Facility Operating Licenses (RFOLs) Nos. DPR-31 and DPR-41, respectively, include Physical Protection license condition 3.E that requires FPL to fully implement and maintain in effect all provisions of the Commission-approved CSP, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

1.2 No Significant Hazards Consideration Determination

FPL is requesting approval of a change to Turkey Point Units 3 and 4 RFOL Nos. DPR-31 and DPR-41, respectively, to revise Physical Protection license condition 3.E as it relates to the CSP. This change includes a proposed deviation to the CSP implementation schedule and a proposed revision to the Turkey Point RFOLs to include the proposed deviation. Specifically, FPL proposes to change the completion date for full implementation (Milestone 8) of the CSP from December 31, 2015 to December 31, 2017.

FPL has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as described below:

- (1) Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. The change does not alter accident analysis assumptions, add any initiators or affect the function of plant systems or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability or the structures, systems and components relied upon to mitigate the consequences of postulated accidents and has no impact on the probability or consequences of an accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. This proposed change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems and a component relied upon to mitigate the consequences of postulated accidents and does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Plant safety margins are established through limiting conditions of operation, limiting safety systems settings and safety limits specified in the technical specifications. The proposed change to the Cyber Security Plan implementation schedule is administrative in nature. Because there is no change in these established safety margins as result of this change, the proposed change does not involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, FPL concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

1.3 Conclusion

Based on the considerations described above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be in compliance with the Commission's regulations and

(3) the issuance of amendments will not be inimical to the common defense and security or to the health and safety of the public.

2. ENVIRONMENTAL CONSIDERATION

The proposed amendment provides a change to the Cyber Security Plan implementation schedule. The proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(12). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

Attachment 3

**Florida Power & Light Company
Turkey Point Units 3 and 4**

**Renewed Facility Operating License Nos. DPR-31 and DPR-41
Proposed Operating License Change
(marked-up pages)**

(2 pages follow)

D. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluations dated February 25, 1994, February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999, subject to the following provision:

The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Florida Power and Light Turkey Point Nuclear Plant Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program - Revision 15" submitted by letter dated August 3, 2012.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 245 as supplemented by a change approved by Amendment No. 256.

- F. 1. The licensee shall restrict the combined number of fuel assemblies loaded in the existing spent fuel pool storage racks and cask pit rack to no more than the capacity of the spent fuel pool storage racks. This condition applies at all times, except during activities associated with a reactor core offload/reload refueling condition. This restriction will ensure the capability to unload and remove the cask pit rack when cask loading operations are necessary.
2. The licensee shall establish two hold points within the rack installation procedure to ensure proper orientation of the cask rack in each unit's spent fuel pool. Verification of proper cask pit rack orientation will be implemented by an authorized Quality Control inspector during installation of the racks to ensure consistency with associated spent fuel pool criticality analysis assumptions.

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The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Turkey Point Nuclear Generating Station CSP was approved by License Amendment No. 241 as supplemented by a change approved by Amendment No. 252

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