



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 18, 2019

Mr. Mano Nazaar  
President and Chief  
Nuclear Officer  
Nuclear Division  
Florida Power & Light Company  
Mail Stop: EX/JB  
700 Universe Blvd  
Juno Beach, FL 33408

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE ASSOCIATED WITH THE SUBMITTAL OF SUPPLEMENTS TO TURKEY POINT NUCLEAR GENERATING, UNIT NOS. 3 AND 4 SUBSEQUENT LICENSE RENEWAL APPLICATION (EPID NO. L-2018-RNW-0002)

Dear Mr. Nazar:

By letters dated January 30, 2018 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML18037A812), February 9, 2018 (ADAMS Accession No. ML18044A653), February 16, 2018 (ADAMS Package Accession No. ML18053A123), and March 1, 2018 (ADAMS Package Accession No. ML18072A224, respectively), to the U.S. Nuclear Regulatory Commission (NRC), Florida Power & Light Company (FPL) submitted and supplemented an application for subsequent license renewal (SLR) of Renewed Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating, Unit Nos. 3 and 4.

Subsequently, FPL submitted three interrelated supplements:

- "Safety Review Requests for Additional Information (RAI) Set 4 Responses" by letter dated October 24, 2018 (ADAMS Accession No. ML18299A214);
- "Safety Review Requests for Additional Information (RAI) Set 6 Responses", by letter dated November 2, 2018 (ADAMS Accession No. ML18311A307); and
- "NUREG/CR/-6909 Revision 1 Methodology Update SLRA Revisions," by letter dated November 19, 2018 (ADAMS Accession No. ML18330A060).

A total of eight affidavits requesting withholding of proprietary information were submitted among these three letters. Affidavits in one submittal would, at times, refer to information in another submittal; therefore, the proprietary withholding reviews were done simultaneously. The results of that review are being communicated by letter on an affidavit-by-affidavit basis.

An affidavit on behalf of Framatome was executed on October 12, 2018, by Gayle Elliott, Deputy Director, Licensing and Regulatory Affairs, and included in the October 24, 2018, submittal. (A copy of this affidavit was also submitted in the November 19, 2018, letter.) The affidavit requested that the information contained in the related documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390.

The affidavit from Framatome stated that the submitted information is proprietary and should be considered exempt from mandatory public disclosure. Listed below are some of the reasons in the affidavit:

- The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 9.17 and 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains trade secrets or confidential or privileged commercial or financial information and should be withheld from public disclosure.

Therefore, the version of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

The documents stated in the enclosure to this letter will be withheld from public disclosure.

The nonproprietary copy of your documents and the letter have been placed in the NRC's Public Document Room and added to the NRC Library as described in the enclosure.

M. Nazar

- 3 -

If you have any questions regarding this matter, I may be reached at 301-415-1056, or by email at [Lauren.Gibson@nrc.gov](mailto:Lauren.Gibson@nrc.gov)

Sincerely,

*/RA/*

Lauren K. Gibson, Project Manager  
License Renewal Projects Branch  
Division of Materials and License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure:  
As Stated

cc w/encl: list serv

Phillip A. Opsal, Manager  
Product Licensing  
Framatome  
3315 Old Forest Road  
Lynchburg, VA 24501

Enclosure

Documents Withheld under the October 17, 2018, Affidavit on behalf of Framatome

(ADAMS Accession No. ML18299A114)

Table 1: Documents to be Withheld that are Explicitly Listed in the Affidavit

Title	Date	Attachment	Enclosure	Package #	Public ML
32-9280711, Rev 1 "Turkey Point SLR EAF Analysis for Reactor Vessel Flange," (Public No. 32-9279161-002)	Affidavit says dated September 2018; document itself says 10/5/18	1	8	ML18330A060	ML18330A034
32-9279212-002, "Turkey Point 3 & 4 Replacement RVCH CROM Nozzle EAF Analysis," (Public No. 32-9280708, Rev 2)	Affidavit says dated September 2018; document itself says 10/5/18	1	5	ML18330A060	ML18330A031
32-9279174-002, Rev 2 "Turkey Point- 3 & 4 CRDM Nozzle to Adapter Weld Connection EAF Evaluation," (Public No. 32-9280707, Rev 1)	Affidavit says dated September 2018; document itself says 10/5/18	1	4	ML18330A060	ML18330A030
32-9279362-002, "TP Vent Nozzle Environmentally Assisted Fatigue," (Public No. 32-9280710, Rev 1)	Affidavit says dated September 2018; document itself says 10/4/18	1	7	ML18330A060	ML18330A033
32-9279367-002, "TP CRDM Latch Housing Environmentally Assisted Fatigue," (Public No 32-92800709, Rev 001)	Affidavit says dated September 2018; document itself says 10/4/18	1	6	ML18330A060	ML18330A032

32-9280202-003, "TP CROM Lower Joint Environmentally Assisted Fatigue," dated October 2018, (Public No. 32-9280712)	Affidavit says dated October 2018; document itself says 10/12/18	16	3	ML18299A214	ML18299A117
---	--	----	---	-------------	-------------

Table 2: Documents to be withheld that contain information originating from Documents in Table 1 (Not listed in the affidavit)

Title	Date	Attachment	Enclosure	Package #	Public ML
L-2018-212-Revision 1 Methodology Update SLRA Revisions Attachment 1- General Summary ML18330A038	11/19/18	1	summary	ML18330A060	ML18330A029
L-20180193, FPL Response to RAI No. B.2.3.7-1	November 2, 2018	25P	Summary response	ML18311A307	ML18311A299

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE ASSOCIATED WITH THE SUBMITTAL OF TURKEY POINT NUCLEAR GENERATING, UNIT NOS. 3 AND 4 SUBSEQUENT LICENSE RENEWAL APPLICATION: NUREG/CR-6909 REVISION 1 METHODOLOGY UPDATE SLRA REVISIONS (EPID NO. L-2018-RNW-0002)

**DISTRIBUTION:**

**E-MAIL:**

PUBLIC/NON-PUBLIC  
 RidsNrrDmlr Resource  
 RidsNrrDmlrMrpb Resource  
 RidsNrrDmlrMenb Resource

RidsNrrDmlrMphb Resource  
 RidsNrrDmlrMccb Resource  
 RidsNrrDmlrMvib Resource  
 RidsNrrPMTurkeyPoint Resource

YEdmonds NRR/DMLR  
 SLent NRR/DMLR  
 LJames NRR/DMLR  
 BRogers NRR/DMLR  
 EOesterle NRR/DMLR  
 BBeasley NRR/DMLR  
 MKhanna NRR/DMLR  
 JDonoghue NRR/DMLR  
 PBuckberg NRR/DORL  
 STurk OGC  
 EHouseman OGC  
 JWachutka OGC  
 SBurnell HQ/OPA  
 RHanna RII/OPA  
 JLedford RII/OPA

DAdams OCA  
 DDecker OCA  
 JPelchat RII/ORA  
 RMusser RII/DRP  
 LPressley RII/DRP  
 DOrr RII/DRP  
 RReyes RII/DRP  
 JQuichocho OEDO  
 ELea RII/ORA  
 ABilloch OEDO  
 PCooper RII/DRS

[Steve.Franzone@fpl.com](mailto:Steve.Franzone@fpl.com);  
[William.Maher@fpl.com](mailto:William.Maher@fpl.com);

ADAMS Accession Nos.: Pkg ML19155A147; Letter ML19162A050 \* via e-mail

OFFICE	PM:MRPB:DMLR	LA:MRPB:DMLR*	BC:MRPB:DMLR	PM:MRPB:DMLR
NAME	LKGibson	SLent	EOesterle	LKGibson
DATE	6/13/2019	6/12/2019	6/13/2019	6/18/2019

**OFFICIAL RECORD**