



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

April 21, 2011

LICENSEE: NextEra Energy, Inc., and Florida Power & Light Company

FACILITIES: Turkey Point, Units 3 and 4, St. Lucie, Units 1 and 2, Point Beach, Units 1 and 2, and Duane Arnold

SUBJECT: SUMMARY OF MARCH 22, 2011, PRE-APPLICATION MEETING WITH NEXTERA ENERGY, INC., AND FLORIDA POWER & LIGHT COMPANY, ON TURKEY POINT, UNITS 3 AND 4, ST. LUCIE, UNITS 1 AND 2, POINT BEACH, UNITS 1 AND 2, AND DUANE ARNOLD TRANSITION TO NFPA-805 REQUIREMENTS

On March 22, 2011, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of NextEra Energy, Inc., Florida Power & Light Company (NextEra, the licensee) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the pre-application meeting was to discuss the proposed license amendment requests (LARs) to transition to the requirements of National Fire Protection Association (NFPA) – 805 for Turkey Point, Units 3 and 4, St. Lucie, Units 1 and 2, Point Beach, Units 1 and 2, and Duane Arnold Energy Center. A list of attendees is provided as an enclosure.

The licensee provided a PowerPoint presentation prior to the meeting to help facilitate the discussion (Agencywide Document and Management System (ADAMS) Accession No. ML110770349). As a result of the meeting, the licensee revised the presentation to reflect the discussions during the meeting (ADAMS Accession No. ML110820699). The licensee presented fleet challenges on the NFPA-805 project, projected schedules for submitting the LARs, and provided site specific updates.

The licensee began the presentation by providing its project schedule for submitting the LARs for each site. The licensee plans to submit the Duane Arnold, St. Lucie, and Point Beach LARs by June 29, 2011, and the Turkey Point LAR by June 24, 2011. The licensee stated that these schedules have little to no float.

After the licensee provided an NFPA-805 transition project plan overview, NextEra provided insight of its fleet level issues. Some of the issues discussed were the limitation of specialized skill sets and probabilistic risk assessment (PRA) resources, major spring outages at three of the four sites (Turkey Point, St. Lucie, and Point Beach) supporting concurrent proposed extended power uprates, and the acquisition of external resources to complete the focused scope peer reviews to remove the open findings and observations previously identified at each site. Per Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," the licensee performed a peer review at each site to determine how well it complies with the American Society of Mechanical Engineers / American Nuclear Society PRA standards. As a result of these peer reviews, findings and observations (F&Os) were identified. For risk-informed applications, licensees need to provide the F&Os and discuss how they are resolved. Even though not

required, the licensee has scheduled focused scope peer reviews to resolve the F&Os. The focused peer reviews are scheduled late in the process for submitting the LARs.

Another issue the licensee discussed was open circuit current transformers (CTs), which NextEra categorized as an industry generic issue. More specifically, the licensee stated that there is no firm guidance on CT failures causing a secondary fire and how to resolve the issue, even though industry is aware of CT failures causing undesirable situations. The licensee continued by stating that this issue was not resolved via the pilot plants due to one plant using transducers and therefore this issue does not apply, and the other pilot plant not resolving the issue at the time of the safety evaluation. The NRC staff asked for the licensee's plan forward for addressing the issue in the proposed LARs. The licensee stated that they are resolving this issue in parallel with the generation of the LAR applications. If the issue is not resolved by June 29, 2011, or when the applications are submitted to the NRC staff, then the LARs will include a commitment to provide a supplement at a later date regarding the resolution of the issue. The NRC staff believes that this is an acceptable approach.

The last fleet issue discussed in detail was the use of NUREG/CR 6850 alternative treatments used for three types of fires. The three types of fires discussed were electrical cabinet fires, transient fires, and hot work fires. Even though the licensee plans on using similar alternative methodologies as used for one of the pilot plants, the methods have not been generally accepted by the NRC. The NRC staff explained this issue by clarifying that the alternative methods were reviewed as part of the determination whether the site specific PRA analysis was acceptable. The NRC staff continued by stating that the pilot's PRA analysis was accepted because the NRC concluded that regardless of the use of these methods, there was a reduction in risk associated with the proposed transition to NFPA-805 requirements.

After the fleet issues, the licensee provided site-specific updates. They provided an update for each site for items complete/under review, essentially complete, and nearing completion. The licensee defined essentially complete as the document or evaluation is in-house, but there are open items and nearing completion as the document or evaluation is not in-house and there is a potential for open items. The licensee also discussed site-specific challenges, LAR gaps that will likely require supplements, and strategies to resolve the LAR gaps. Most of the challenges and LAR gaps are similar for each site except for Point Beach. Point Beach has its focused peer review scheduled for June 6, 2011, and is projecting to have its final peer review report by August 2011.

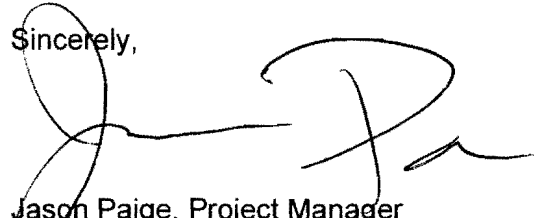
At the conclusion of the meeting, the NRC staff asked, with the LAR gaps presented today and the potential to slip the LAR submittal dates, what are the expectations for providing updates of the LARs. The licensee stated that they will keep the respective NRC plant project managers up to date of any changes to the plan as discussed during the meeting. Also, the licensee asked, with the LAR gaps, if the staff sees any potential acceptance review issues. The NRC technical staff addressed the question by stating at this time, the staff does not see any major issues but noted, the staff cannot guarantee that the LARs would be accepted without seeing the applications.

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Members of the public were in attendance. Public Meeting Feedback forms were offered, but none were received.

Please direct any inquiries to me at 301-415-5888, or Jason.Paige@nrc.gov.

Sincerely,



Jason Paige, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250, 50-251, 50-335, 50-389,
50-266, 50-301, and 50-331

Enclosure:
List of Attendees

cc w/encl: Distribution via ListServ

LIST OF ATTENDEES

MARCH 22, 2011

MEETING WITH NEXTERA ENERGY, INC., AND FLORIDA POWER & LIGHT
TRANSITION TO NFPA-805 LICENSE AMENDMENT REQUESTS

U.S. Nuclear Regulatory Commission

T. Orf
R. Pascarelli
A. Klein
S. Lee
S. Dinsmore
D. Pickett
T. Beltz
H. Barrett
P. Lain
D. Broaddus
K. Feintuch
D. Frumkin
J. Paige
D. Harrison

NextEra Energy, Inc., Florida Power & Light Co.

K. Frehafer
S. Catron
L. Nicholson
V. Rubano
A. Julka
W. Cross

Nuclear Energy Institute

J. Butler
T. Basso

Public

L. Young
P. Grissom
K. Lavin
J. Ertman
G. Meyer

Enclosure

Members of the public were in attendance. Public Meeting Feedback forms were offered, but none were received.

Please direct any inquiries to me at 301-415-5888, or Jason.Paige@nrc.gov.

Sincerely,

/RA/

Jason Paige, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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RidsNrrPMStLucie Resource

ADAMS Accession No. PKG ML110820814 Notice ML110610427 Summary ML110820827 Handouts ML110770349 & ML110820699

OFFICE	DORL/LPL2-2 /PM	DORL/LPL2-2/PM	DORL/LPL3-1/PM	DORL/LPL3-1/PM	DORL/LPL2-2/LA	DORL/LPL3-1/BC	DORL/LPL2-2/BC
NAME	JPaige	TOrf	KFeintuch	TBeltz	BClayton	RPascarelli	DBroaddus (SLingam for)
DATE	03/28/11	03/29/11	03/30/11	03/30/11	03/28/11	03/30/11	04/21/11

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