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DOCUMENT NUMBER-DATE

06637 JUL 29 88

FPSC-COMMISSION CLERK

Part I

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DOCUMENT NUMBER - DATE  
06637 JUL 29 88  
FPSC-COMMISSION CLERK

1.1a  
560-581

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1.3a-b  
0905-0912

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1.7a  
1007-1015

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1.8a,b  
1017

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2.2  
1052-1054

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1281-1382

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2203-2655

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1383-1386

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1474-2201

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1398-1440

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6166-6216, 6218, 6222, 6224-6226, 6227-6385 <sup>3.1a</sup>



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6398-6511, 6512-6513, 6514-6535, 6392-6394, 6536-6545 3.2a,b

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3.3a-b  
6549-6839

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3.7a  
7157-7174

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3.11a,b,c  
7932-8788

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3.13  
6217-6218, 6222, 6224-6226

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3.16  
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2677-2712

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2714-2720

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3.25  
2721-3451

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3.26 a-g  
3452-3453

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3.27  
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3455-3472

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3473-3476

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4.1  
6142, 6146, 6149-6155

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4.2  
5947-5958

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4.4a  
3480-3483

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4.4d  
3565-3566

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5.3  
Pages 1 - 105

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5.13

All files on CD:

FPL SSR GIS, q98\_99\_FEASIBILITY REPORT, q98\_99\_SIS\_REPORT\_11-07,  
Q107\_108 System Impact Study for TP Units 8 and 9, RFI Grid Study041608,  
RFI\_Response\_Trans I and I and Sht Ckt Anal \_031708, RFI\_Response\_Trans I and I  
and Sht Ckt Anal \_ALT 1A\_051608\_Final, TSR 927068 and TSR 927071 SIS, TSR  
Facilities Study IDs 927068 & 071, x1300\_FEASIBILITY REPORT11\_20\_07.

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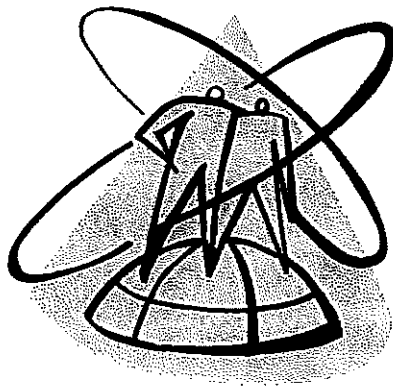
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# FLORIDA POWER & LIGHT COMPANY



## NUCLEAR CONTROL REVIEW

TURKEY POINT AND ST. LUCIE UPDATES  
New Nuclear Turkey Point Units 6&7

Workpapers  
Interview Summaries (1-15)  
and Document Control Logs (DR-1,2,4,5,6, & 7)

## Bureau of Performance Analysis Interview Summary

Company: FPL Area: Nuclear Control Review Auditor(s): C. Vinson & L. Fisher	Interview Number: St. Lucie Tour 1 File Name:
Name: Tony Bechem Title: Site Project Manager- St. Lucie Power Uprate Project Job Experience:	Date of Interview: 3/26/08 Location: St. Lucie Nuclear Power Plant 6501 Ocean Blvd., Jensen Beach, FL 34957 Telephone Number: 772-429-7846

(1) Purpose of Interview: To understand the uprate projects planned for St. Lucie Units 1 &2:

(2) Interview Summary:

1. Tony stated that the Project Manager is responsible for the installation and modification of all equipment associated with the uprate of both units; he reports to Bill Labbe, as do site project managers at Point Beach and Turkey Point; Bill Labbe is over project management for the uprates; Jack Hoffman reports to Steve Hale who is over Project Engineering; the site team will top out at about 90 people; a new on-site maintenance bldg. is under construction, but is not part of the uprate project; FPL is using Siemens turbines/generators; received a fleet discount for the new units.
2. Tony described the three different types of uprates (Stretch, MUR and EPU) and described the types to be used for Units 1&2.
3. There are three types of uprates (MUR, SPU and EPU); MUR is a Measurement Uncertainty Recapture, which usually provides less than a 2% increase in MW power; an MUR is also known as an Appendix K uprate; MUR includes the replacement of feedwater flow measurement devices with more accurate (sonic) devices; more precise measurements reduce the degree of uncertainty in the power level; FPL is looking for a 1.7% improvement in the feedwater flow measurement capability during its MUR; a Stretch Power Uprate (SPU) typically can yield up to a 7% power increase within the design capacity of the plant; it reviews the entire system to identify how far you can go until the system reaches its greatest capacity (in the area ~ 5%; SPU usually involves changes to instrumentation set points but does not involve major plant modifications; An Extended Power Uprate (EPU) maximizes the system to provide the greatest limit the fuel can provide; usually provides a greater than 7% power increase, but have been approved by NRC for as high as 20% increases; requires significant modifications to the balance-of-plant (BOP) such as turbines, secondary pumps and motors, main generators, and or, transformers; FPL will use an EPU to increase output about 11.7% or 103 MW/unit (10% EPU and 1.7% MUR) out of the existing units w/o changing the plant footprint;
4. Tony has been on site since the first part of '08; the actual site team is not fully in place; work on the reactor vessel head (RVH) has already been completed.
5. Will complete work during outages in the Spring and Fall of 2010, the Fall of 2011 and the Spring of 2012
6. Shaw & Webster are doing turbine, feedwater flow, heat exchanger; Siemens is doing the turbine and generator mods; Tony noted that none of these contracts are "final/final", but are about to be completed soon; a letter of confirmation specs is being sent to Seimens;
7. Tony noted that there are three turbines for each unit that will have new rotors and blades replaced, and the stationary blades will be examined along with the original casing for possible replacement; He mentioned that when the rotors are replaced the one removed is refurbished and placed into an industry spare; Tony also mentioned that the St. Lucie units use a hydrogen cooler to cool the turbine blades on the bottom side; Order time for manufacturing turbine is 1.5-2 yrs;
8. Tony is a specialized worker contracted to FPL by TSSD for supplemental engineering staffing; FPL is also using Prestige Upgrades to bring in additional engineering staffing on-site at St. Lucie;
9. This Fall FPL should know if the condensor internals need to be replaced, which could increase costs to \$180 million to \$200 million; Tony used this as an example of how the costs could escalate on the uprate projects; the on-site team is currently developing packages of what needs to be done on-site and complete

scheduling for each activity.

10. Tony provided a handout that discussed the Extended Power Uprate (EPU) project at St. Lucie units 1 and 2; Jack Hoffman is Tony's counter-part for project engineering on the St. Lucie uprate; tony says Jack is a long-time FPL employee responsible for the NRC licensing; Jack completed NRC licensing and renewal at Turkey point in the previous uprate; the BOP will be done by Stone & Webster

11. Westinghouse will complete unit 2 fuel design and safety analysis and unit 1&2 NSSS system & component analyses; Areva (previously B&W America) will complete unit 1 fuel design and safety analyses and unit 1&2 RVH and unit 1 Pzr and unit 2 RSGs; Shaw & Stone will complete the Balance Of Plant (BOP) analyses; B&W Canada will complete the work on unit 1 RSGs; Siemens will complete the turbine generator modifications;

12. A Modification Scope for each Unit is also provided in the handout, with a Nuclear plan Overview showing critical components within the plants to be replaced.

13. To date FPL says it has completed initial feasibility and scoping studies, validated project scope and cost, finalized major contract strategy, developed engineering and modification schedules, identified key EPU design parameters, and is completing EPU core designs. FPL also states that it has completed initial PEPSE heat balances, developed the condensate and feedwater hydraulic model, issued HP and LP turbine specifications, issued the main generator specification and is developing safety analysis ground rule assumptions.

**(3) Conclusions:**

1. FPL is completing an MUR and EPU uprate of units 1 & 2 at St. Lucie

2. FPL is looking for a 1.7% improvement in the feedwater flow measurement capability during its MUR; FPL will use an EPU to increase output about 11.7% or 103 MW/unit (10% EPU and 1.7% MUR) out of the existing units w/o changing the plant footprint;

3. Tony noted that there are three turbines for each unit that will have new rotors and blades replaced, and the stationary blades will be examined along with the original casing for possible replacement;

4. A Modification Scope for each Unit is also provided in the handout, with a Nuclear plan Overview showing critical components within the plants to be replaced

5. This Fall FPL should know if the condensor internals need to be replaced, which could increase costs to \$180 million to \$200 million; Tony used this as an example of how the costs could escalate on the uprate projects;

6. To date FPL says it has completed initial feasibility and scoping studies, validated project scope and cost, finalized major contract strategy, developed engineering and modification schedules, identified key EPU design parameters, and is completing EPU core designs. FPL also states that it has completed initial PEPSE heat balances, developed the condensate and feedwater hydraulic model, issued HP and LP turbine specifications, issued the main generator specification and is developing safety analysis ground rule assumptions.

**(4) Data Request(s) Generated:**

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

**(5) Follow-up Required:**

1. Clarify w/Tony whether his example of the condensor internals needing to be replaced, could increase costs by \$180 million to \$200 million or to \$180 million to \$200.

2. Ask for listing of feasibility and scoping studies completed or in-progress, and copies of completed analyses and recommendations. (DR-2)

3. Provide copy of project scope and cost validation analysis. (DR-2)

\_\_\_\_\_  
Project Manager

## Bureau of Performance Analysis Interview Summary

Company: FPL Area: Nuclear Uprate Auditor(s): Vinson/Fisher	Interview Number: 2 File Name: FPL Labbe Intvw.doc
Name: <b>Bill Labbe / Steve Hale</b> Title: EPU Project Director / EPU Engnrng Director Job Experience: <b>Labbe</b> -5 yrs FPLEnergy, career electric nuclear power plants before that, ran Seabrook uprate. <b>Hale</b> - 30+ yrs FPL nuclear, both TP and SL also worked at Seabrook over Bill	Date of Interview: 3/27/08 Location: Juno Offices Telephone Number:

- (1) Purpose of Interview: General overview of EPU projects organizations and controls
- (2) Interview Summary: (NOTE- handout provided entitled EPU Int Contrl Revw Mtg w/FPSC Staff 3/27/08)
- Bill and Steve share the overall responsibility for the EPU projects (both plants) with Bill directing the execution and testing of the work, and Steve directing the engineering of the modifications.
  - Both play key roles in scoping work, selecting contractors, scheduling work, and tracking progress.
  - Both report to Raj Kundalkar, VP Nuclear Technical Services and report deal to him on project status.
  - Bill has Proj Mgrs at SL (Tony Becham) and TP( ); Steve has Eng Mgrs at SL(Hoffman) and TP ( )

Uprate History - Projected need and load led to an initial feasibility study, then scoping study.

- April 07 determined design margins would allow 12% MW uprate at SL and 14% at TP.
- Summer 2012 was set as goal for inservice to meet needs. Realized 3 of 4 units could be done in time, last 1 on Fall '12
- Critical Path = NRC licensing and component review. FPL's prep time = 4 mos, NRC acceptance = 2 mos, NRC review process = 12 mos. Grand total 18mos. If NRC RAIs (request addit info) could even take longer
- Long lead items = 2<sup>nd</sup> longest path. Main ones: Turbine rotors, Generator rotors. Forging work/scheduling are problematic sicne industry busy.

Major Contractors - many by sole source – (justification writeups obtained via DR2)

- Siemens - had to pay a reservation fee of \$1.1 Mill (check this amt) but would be credited to work if contract given. At time went by in decision process, refund would shrink. So all will be credited.
- Turbine not truly sole-sourced to Siemens: FPL brought in Toshiba, Mitsubishi, Alston and all made proposals. (written?) None could both meet the '12 date and do all the work without a turbine redesign to fit their std configurations (costly and slower). Siemens was logical choice and their business required fast action.
- Westinghouse was single or sole sourced - They own the safety analysis of TP3,4 and SL2
- Areva – single/sole sourced - same thing, owns safety analysis of SL1
- Shaw/Stone & Webster – single/sole sourced: 1) have done 40-50 of the total \_\_\_ uprates done in US nukes 2) were low bidder on prior TP uprate 3) were low bidder by far on Seabrook.
- Major components

Industry Overload Issue - FPL pressed S/SW and W to explain how their workload would mesh with SL and TP projects (plus Pt Bch for FPLE) Both satisfied FPL. Eg. S/SW just freed up people from Comanche Pk and Beaver Valley.

- FPL's own workload – stated that there is overlap in 2011-12 but they have plans to get teams in place by transitioning off uprates and onto TP 5&6.
- Using some contract staffing (eg Becham) and some FPL experienced staff (Hoffman) to optimize their skills and available industry resources
- FLP has a staffing plan through 2009 to ramp up the planned work so far (uprate) – NRC reviewed this to assess its viability plus asked about impact of application process.

St Lucie vs Turkey Pt Comparison – EPU differences are that TP has more secondary system component

changeouts and mods, hence higher pricetag. Also SL is starting sooner in their plan. See pages 4,5 in handout listing timing and elements of wk at each plant.

Project Mgt Team – worked from *EPU Project Oversight* org chart provided in DR1-2.

- Executive Steering Committee – key body that includes Olivera (CEO FPL) Robo (CEO FPLE), Stall (CNO), Nazar (CNOpO), McGrath (VP Eng) meeting on 6 wk or so rotation, ultimate decisionmakers on maj contractors, receive project updates, etc. Risk Committee reports to them for advice on financial risk issues (vendors, schedule)

- Project Steering Committee – chaired by Kandalkar, Nazar, other stakeholder VPs, major vendors (Siemens, W, S/S&W) meets monthly, action items that result are tracked in action item Access DB, but no minutes – Committee is advised also by a Nuclear Division Tech Challenge Board – ad hoc meetings on problems addressed by inhouse experts as they arise

- Key Performance Indicators – report card for 7 key areas (safety, cost, schedule, HR, risk mitig, Quality & Human Performance, regulatory) that is presented to both Steering Committees. Total of 17 measures w/specific quant. levels set for red (project threat), yellow (project warning), green (on target). Egs: Cost = total costs/cash flow (ratio of actual to budget) Schedule = % of tasks for week done.

Internal Controls – (month?)/07 started with initial internal scoping studies ('order of magnitude' budget)

- 9/07 Shaw/Stone&Web Construction org did indep review: concluded plan was good, had some changes on sequence of TP work – pretty much net wash costwise

- Followup Feasib Study by S/S&W (normally a step done later) – revwd scope, budget, detailed system review, assumes worst case (replace item) but may be cheaper (refurbish instead) - decide when work actually done

- Procedures -hierarchy of procedures ensures consistency and P&P adherence. 'NPs'=nuclear policies, 'NAPs'=nuclear admin procedures, 'EPPIs'=project instructions. Latter are specifically written to govern each project (EPU here)

- Level I Budget (in progress now, complete 3<sup>rd</sup> Qtr '08) development process defined in procedures, granular line item estimates carefully prepd. Level II budget more detail, builds on fully specified mods and completed design. Will complete in 2009

- Cost tracking systems (DR1-2) EPPI 300, procedure for scope changes

- Schedule tracking systems

- Schedule tracking systems – Primavera server gives access. Run by P3. Sharepoint?

Communications – (see org charts) Steering Committees, internal structure of project teams ensure most vertical communication on project.

- Other key meeting is Project Controls Meeting (Thurs) - requested info DR2-9.

- Plant Health mtgs - ?

- It owners are informed annually, last one was 3/21/08. Only 12% of SL 2 jtly held so they play passive role and do not appear to want more info or input [likely beyond owners' expertise.]

### (3) Conclusions:

Early decision making - Feasib and Scoping Studies done, need to review these - need to synch up with 10 yr Site Plans?

Controls Extensive set of controls exist or in process of implementation. Permanent and project based procedures.

Project Mgt Dual leadership of Engineerg (Hale) and Build/Test (Labbe) provides outside EPU nuke uprate experience meshed with longterm SL and TP FPL experience. (Also setup this way down into the plant team.) Pair reporting to Kundalkar who runs Project Steering Comm is appropriate separation of review from project work. Exec Steering Comm then oversees them to provide layered defense against project mgt, contractor errors. No minutes taken by Steering Committees – do track 'takeways' - problem?

Contractor Selection Seems ok on face – many selections sole/single source but justifications seem in order so far, Siemens was actually not pure sole source since 3 others came and pitched. Only chink is Siemens report card – not great (e.g. some late deliveries) in past on total FPL work (including non-nuke), should be watched carefully to nip emerging problems in bud.

<u>Progress reporting</u> Not really critical yet due to early stage.
(4) Data Request(s) Generated: No. DR2 – almost all came from this interview.
(5) Follow-up Required: Highlighted in red above.

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Project Manager

## Bureau of Performance Analysis Interview Summary

Company: FPL Area: Nuclear Control Review Auditor(s): C. Vinson & L. Fisher	Interview Number: Juno HQ <span style="float: right;">3</span> File Name: FPL Warnocki Intvw.doc
Name: Mark Warnocki Title: Contract Manager Job Experience:	Date of Interview: 3/27/08 Location: Juno HQ Telephone Number:

(1) Purpose of Interview: To understand the Contract Manager position and contract controls for the FPL uprate projects

(2) Interview Summary:

1. NAP 420 governs contract development and administration; FPL bids anything over \$25,000 according to Mark (sometimes under); the EPPI 200 series of procedures deal with Contract Administration (210), Project Requisition and Purchase Order (220), and EPU Contract Compliance Program (240); EPPI 220 contains a flowchart of the process; NAPs 705 and 1100 govern the Sole Source process and requirements for justification;
2. Contract Management completes weekly updates to its Project Contract log and provides reports to management.
3. Contract Management completes an annual vendor Scorecard (Areva for 2006 and Siemens for 2007) to give an overall rating system-wide for each vendor for a the year.
4. The contract review and approval process is flowcharted in EPPI 220 and described in NP 301; contracts over \$25K must go to the VP for signature;
5. The contract Group uses a standard set of terms already in-place with many vendors; these can be used or revised as needed to customize contract terms; FPL uses some contracts (M.S.) not as a binding contract, but to negotiate terms with before agreeing to a contractual arrangement.
6. Contract audits are more self assessments from internal FPL people or outside consultants possibly; these reviews are done periodically or as a deficiency is found in key items being completed, for example the LAR;
7. An independent Oversight Director (Bob ???) and employee (Chris Lloyd) are completing an oversight plan now (1-2 months to complete); these people will review contracts as needed for deficiencies and contract disputes.
8. Invoice Reviews are completed by the Cost Engineer who gets specific requests, reviews them for the work being done and charges to the contract account and routes the request to a Technical Reviewer; The Technical Reviewer determines whether the work billed for was completed and if needed passes higher up for approval ; applies General Office 3000 procedures to review.
9. Responses to Kathy's Benchmark pages: 9/07 compares on a total project cost basis; Westinghouse compression is apples and oranges /SL diff; HP turbines open and close not or included ???; later FPL had two generator people evaluate those costs.

(3) Conclusions:

1. NAP 420 governs contract development and administration; FPL bids anything over \$25,000 according to Mark (sometimes under); the EPPI 200 series of procedures deal with Contract Administration (210), Project Requisition and Purchase Order (220), and EPU Contract Compliance Program (240); EPPI 220 contains a flowchart of the process; NAPs 705 and 1100 govern the Sole Source process and requirements for justification;
2. Contract Management completes an annual vendor Scorecard (Areva for 2006 and Siemens for 2007) to give an overall rating system-wide for each vendor for a the year.
3. Contract audits are more self assessments from internal FPL people or outside consultants possibly; these reviews are done periodically or as a deficiency is found in key items being completed, for example the LAR;

(4) Data Request(s) Generated:

No. \_\_\_\_\_  
 No. \_\_\_\_\_  
 No. \_\_\_\_\_

(5) Follow-up Required:

1. Get independent oversight plan from Chris Lloyd when available
2. Get better understanding of the benchmark effort for Claude Vanet
3. Get historical vendor score cards for all vendors doing work on the uprate
4. Copies of all contract management audits completed in last three years (unless previously provided)
5. Copies of all contract management self-assessments completed in the last three years (unless previously provided)

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Project Manager



## Bureau of Performance Analysis Interview Summary

Company: FPL Area: Nuclear Control Review Auditor(s): C. Vinson & L. Fisher	Interview Number: 4 File Name: FPL Kundalkar Intvw.doc
Name: Raj Kundalkar Title: V. P. Nuclear Technical Services Job Experience: 25 plus years in nuclear operations; certified operator of nuclear plant	Date of Interview: 3/28/08 Location: St. Lucie Nuclear Power Plant 6501 Ocean Blvd., Jensen Beach, FL 34957 Telephone Number: 772-429-7846

(1) Purpose of Interview: To understand the organizational structure responsible for completing the uprate projects planned for St. Lucie Units 1 & 2 and for Turkey Point Units 3 & 4 and controls surrounding the project

(2) Interview Summary:

1. Uprate projects are being completed to take advantage of margins in the plant design to gain additional MW production; not increasing the plant footprint in the process; using a tried and tested process of uprate to gain additional MW; a cost matrix was evaluated that compared different fuels and their cost/KW; gas was compared to new nuke and the clear advantage was nuclear, 100s of millions less over the life of the plant; approximately 100+ uprates have been completed in the nuclear industry.
2. Raj is responsible for engineering, project management, fuel procurement, licensing, supply chain, and cost management for the three uprates; Raj reports directly to Art Stall, Chief Nuclear Officer, and Art reports to Jim Robo; Raj states that FPL has a well-managed group of nuclear experts to manage large projects like the uprates; Raj says that he is also responsible to the Executive Committee for the uprate projects budget.
3. The Executive Steering Committee is chaired by Jim Robo, and includes Art Stall, M. Davidson, R. McGrath (VP Supply Chain), Armando Olivera, and M. Nazar; every 4-6 weeks this group meets to discuss all projects, including the uprates; The Executive Committee gave the final approval on the uprate projects.
4. The organization includes two risk groups: the Nuclear Division Technical Challenge Board at the Steering Committee level (headed by Terry Jones), which considers plant decisions for nuclear projects, and the Risk Committee at the executive level (headed by Chris ??? ), which considers financial risk strategies and impacts; Chris reports to Bob Accosta (QA) and Bob reports directly to Art Stall; Chris completes a daily quality summary and meets daily with management to impact operational concerns; financial audits would be performed by FPL's Internal Audit Group; The two independent groups provide input on an issue by issue basis and meet as-needed; At Turkey Pt. consideration of whether to change out transformers was addressed by the Nuclear Division Board, and examined by the Executive Steering Committee for the key decision of whether to change out plant unit transformers; Other oversight comes from daily reports from Bill Labbe and Steve Hale, weekly project scheduling updates, and an every Thursday meeting with project managers and Supply Chain to discuss where the project is and what may be causing any potential delays.
5. Steve Hale noted that each uprate has similarities and differences based on its scope; for example, at Seabrook the company needed to put in an advanced exciter which had not been part of the project design; regulatory approval to change the project impacted the schedule and lengthened completion time frames; The NRC lists all uprates on its website under power reactor; Eagle Valley compares to Turkey Point in uprates; Waterford III is comparable to St. Lucie.
6. Raj stated FPL considered a possible global challenge from resource constraints within the Nuclear Industry. He said that before undertaking a project such as the uprates, FPL looked at critical components and other resource needs and recognized the need to prioritize lead-times on equipment; some providers only manufacturer a small part of the specialized equipment needed, such as pumps, motors and transformers (need to be sequenced), while others manufacture large key components with long lead times (need to order with lead times of 12-36 months). FPL had to prioritize equipment lead times (and pay for manufacturing slots) to assure key equipment was delivered on time; FPL deals with Westinghouse on a daily basis for existing plants, as well as on key projects such as the uprates; Shaw & Webster are engineers for the LAR, which has the longest lead time; FPL must include in their planning any synergies between the uprates and new nuclear plant construction

approved.

7. St. Lucie Units 1 & 2 have different fuel vendors because of differing fuel assemblies; Unit 1 uses a 14X14 rod matrix, while Unit 2 uses a 16X16 rod matrix assembly. Each fuel vendor provides separate needs for the units; reliability of fuel is another consideration, along with supplier availability.

(3) Conclusions:

1. Raj is responsible for engineering, project management, fuel procurement, licensing, supply chain, and cost management for the three uprates; Raj reports directly to Art Stall, Chief Nuclear Officer, and Art reports to Jim Robo; Raj states that FPL has a well-managed group of nuclear experts to manage large projects like the uprates; Raj says that he is also responsible to the Executive Committee for the uprate projects budget.

2. The Executive Steering Committee is chaired by Jim Robo, and includes Art Stall, M. Davidson, R. McGrath (VP Supply Chain), Armando Olivera, and M. Nazar; every 4-6 weeks this group meets to discuss all projects, including the uprates; The Executive Committee gave the final approval on the uprate projects.

3. The organization includes two risk groups: the Nuclear Division Technical Challenge Board at the Steering Committee level (headed by Terry Jones ???), which considers plant decisions for nuclear projects, and the Risk Committee at the executive level (headed by Chris Lloyd ???), which considers financial risk strategies and impacts; Chris reports to Bob Accosta (QA) and Bob reports directly to Art Stall; Chris completes a daily quality summary and meets daily with management to impact operational concerns; financial audits would be performed by FPL's Internal Audit Group.

4. Other oversight comes from daily reports from Bill Labbe and Steve Hale, weekly project scheduling updates, and an every Thursday meeting with project managers and Supply Chain to discuss where the project is and what may be causing any potential delays.

5. The NRC lists all uprates on its website under power reactor; Eagle Valley compares to Turkey Point in uprates; Waterford III is comparable to St. Lucie.

6. FPL had to prioritize equipment lead times (and pay for manufacturing slots) to assure key equipment was delivered on time; FPL deals with Westinghouse on a daily basis for existing plants, as well as on key projects such as the uprates; Shaw & Webster are engineers for the LAR, which has the longest lead time;

(4) Data Request(s) Generated:

No. \_\_\_\_\_

No. \_\_\_\_\_

No. \_\_\_\_\_

(5) Follow-up Required:

1. Clarify Terry Jones and Chris names, responsibilities, reports produced and where data is captured for reports.

2. Oversight plan for EPU being developed by Chris Lloyd when available. (DR-2)

3. Get QA daily quality reports issued to-date for Turkey and Lucie uprate projects.

4. Get Executive Steering Committee Minutes for uprates projects. (DR-2)

5. Minutes of meetings including the Nuclear Division Technical Challenge Board to-date.

6. Prioritized equipment lead time schedule for uprates

7. Weekly Project Scheduling updates for uprates to-date

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Project Manager

## Bureau of Performance Analysis Interview Summary

<p>Company: Florida Power &amp; Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson</p>	<p>Interview Number: 5 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS5</p>
<p>Name: TP Plant Tour &amp; Review Title: Bill Stairs – Project Manager EPU-Turkey Point Michael Pierce – Former Plant Mgr. Joe La Duca – Acting Project Engineer- EPU Others Attending include: Ron Curtis, Michelle Hill, Don Stroud Job Experience:</p>	<p>Date of Interview: 5/6/08 Location: Turkey Point Plant Telephone Number:</p>

(1) Purpose of Interview: To understand EPU organization at Turkey Point and to gain understanding of the Unit 3&4 uprate project and the new Units 6&7 to be constructed on the site

(2) a.) Interview Summary: Unit 4 is currently shut down for scheduled refueling; the plant is in mode 3 now; being heated up and will be back on-line this week; there is no work related to the EPU being done during this outage; expect to have RFP out in June and the contract signed for the EPC by 9/08; the first outage for the EPU will be in the Fall of 2010 and there will be two outages for each unit to complete the EPU; currently not planning on replacing the low pressure (LP) turbine; Bill Stairs stated that a staff of 6-8 Project Managers have responsibility for the project; Mike Pierce stated the Project Controls Manager was just hired (Saba Molnar) to monitor costs and scheduling for the EPU at TP Units; Bill Stairs mentioned that SL and TP units are being bid and coordinated where possible for consistency on products and pricing; also provides some leverage to negotiate with vendors; The EPC contractor is being selected soon; there are daily calls between the project team and both TP and SL to coordinate EPU efforts; window for EPU is 55 days and 40 days outage estimated time; will be changing fuel, MUR, dose rate (alternate calculations), spent fuel criticality, and making admin. Changes to fuel design during the outage; will be increasing fuel enrichment, not adding rods; replacing approx. 1/3 of core w/enriched fuel; the planning of overall mod. Change outs must be precise to complete work in an orderly timeframe that is coordinated and efficient in making changes; Shaw did a scoping review and added 50% based on uncertainty; Bill Stairs was hired in specifically for TP oversight because of his utility-side experience; had prior experience at Connecticut Yankee and Millstone

b.) Joe La Duca stated that the TP Units will need updated operational licenses; licenses will take approx. a yr. to 16 mos. For NRC approval; Last August Siemens evaluated the system; LP turbine was replaced in ('86 or '95) and replaced the generator rotor last year; will replace the generator rotor again in the EPU and will also replace the condenser; will be increasing the cooling capacity at TP; Joe mentioned that a switchyard study had been completed (George Pittman); Joe noted that along w/Siemens, other turbine generator bidders visited the site before making final presentations (Toshiba, Alstom, Mitsubishi, Siemens); Joe mentioned that engineering is in the process of ramping up; will have about 60 core team employees; bringing in 6-8 project managers w/engineers; Joe has the engineering team currently working/w Shaw, Stone & Webster and should have the licensing to the NRC in September '09; Once the EPC is in place, the site will be responsible for contractor oversight; currently Ian Waters is the engineering lead, working for Steve Hale and Armad Sharpaz;

c.) The Siemens report card involved hydrogen leaks after the outage, but Joe did not have specifics of the 11 days involved in the outage; suggested Mark Warneke would have more detailed information; Joe said that the plant keeps records on all outages and would have some reports regarding any outage and associated delays (request in DR); Bill said once into an outage 10 or 12 hour shifts would be used; otherwise the shifts would be regular 8 hr. shifts; the scheduling for TP will be broken into projects; resource needs for each project will be identified; A Schedule Challenge Review is used to review proposed iterations of the schedule; an internal review w/ the on-site project team will be completed initially, and then with management after the routine is

reviewed; the on-site review includes contractors and the EPC; Bechtel is the contractor for the COLA and Bechtel subcontractors are completing the core drilling;

(3) Conclusions: a.) Turkey Point is behind St. Lucie in ramping up for the EPU project; Bill Stairs was just hired to direct the on-site activity for the EPU, along with the Controls Manager; Bill Stairs was hired in specifically for TP oversight because of his utility-side experience; had prior experience at Connecticut Yankee and Millstone;

b.) It is expected that the contract for the EPC will be signed by 9/08; currently the team is not planning on replacing the low pressure (LP) turbine; Joe La Duca stated that the TP Units will need updated operational licenses; licenses will take approx. a yr. to 16 mos. For NRC approval; Last August Siemens evaluated the system; Shaw did a scoping review and added 50% based on uncertainty;

c.) LP turbine was replaced in ('86 or '95) and replaced the generator rotor last year; will replace the generator rotor again in the EPU and will also replace the condenser; Joe has the engineering team currently working/w Shaw, Stone & Webster and should have the licensing to the NRC in September '09; Once the EPC is in place, the site will be responsible for contractor oversight; currently Ian Waters is the engineering lead , working for Steve Hale and Armad Sharpaz;

d.) Joe mentioned that a switchyard study had been completed (George Pittman);

e.) The Siemens report card involved hydrogen leaks after the outage, but Joe did not have specifics of the 11 days involved in the outage; suggested Mark Warneke would have more detailed information;

f.) Bechtel is the contractor for the COLA and Bechtel subcontractors are completing the core drilling;

(4) Date Request(s) Generated:

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(5) Follow-up Required:

a.) FPL will replace the generator rotor again in the EPU and will also replace the condenser; identify all items that were replaced in the last two years and bill be replaced again in the EPU and have company provide reasons for making those changes.

b.) Get a copy of the switchyard study completed for Turkey Point (George Pittman) and any recommendations presented in the study;

c.) Get more specifics on the 11 days involved in a prior Turkey Point outage that Siemens was graded poorly on.

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Project Manager

## Bureau of Performance Analysis Interview Summary

<p>Company: Florida Power &amp; Light          Area: Nuclear Controls Review          Auditor(s): L. Fisher/C. Vinson</p>	<p>Interview Number: IVS6          File Name: I:\Bureau Performance Analysis\          Performance Analysis Reports\Nuclear          Construction\FPL Uprate\IVS6</p>
<p>Name: Tony Maceo          Title: Manager of Auditing/Internal Affairs          Job Experience: w/FPL approx. 7yrs in auditing</p>	<p>Date of Interview: 5/6/08          Location: General Office          Telephone Number:</p>
<p>(1) Purpose of Interview: To understand FPL's Internal Audit Planning Process, review Nuclear Purchasing Audits completed 2006-2008 to date, and review selected planned audits for 2008 that may be related to the uprate project</p>	
<p>(2) Interview Summary: a.) As an Audit Manager, Tony has a staff of about eight auditors; Planning ahead for next years audits begins in October; IA first reads next years FPL business planning documentation and becomes familiar with the planned operations and areas of risk for next year; lead auditor SMEs and Audit Managers begin planning meetings w/the business units to brainstorm audit areas; Based on prior audits, and knowledge of the areas of risk and develop a preliminary list of audits; IA brings forth potential audits and meets w/the VP of the different business units to refine the list of audit priorities; Internal Audit management then completes a risk assessment of most important audit areas; using a set of risk criteria, Internal Audit management then assesses the total audit needs (Low, Medium and High) with IA manpower resources and determines the number of audits that can be performed for the year; once the list is refined to approximately 65-75 audits, a final list is made and reviewed w/executive management by the Internal Audit VP; the Board Audit Committee picks the final list; if a subject does not make the final list for this year it is evaluated again for next year's audits.</p> <p>b.) This year IA will complete audits of SL and TP uprates, looking into whether costs are input correctly into the uprate project (not procurement or project management); the scope will include examining whether proper support documentation is provided with expenditures; also looking at whether regular maintenance costs are being input improperly into the uprate cost recovery request; (Fast track audit) three auditors and Tony will complete before end of June; will take two mos. tops, and will look at 2007 through May-June 2008 timeframe; Another nuclear audit on the new units should begin in June w/report in September 2008; by December should have the 2009 Internal Audit plan completed.</p> <p>c.) Staff's review of internal audits is CONFIDENTIAL and auditor hand-written notes are kept in a CONFIDENTIAL FILE; (maintained by Bureau of Performance Analysis)</p>	
<p>(3) Conclusions: FPL IA is completing one audit of the uprates, to assure proper documentation of expenditures charged the uprates for cost recovery during 2007. IA is also completing one audit of the new units 6&amp;7 Construction charges for Cost Recovery for 2007, later in 2008.</p>	
<p>(4) Date Request(s) Generated:</p> <p>No. _____          No. _____          No. _____</p>	
<p>(5) Follow-up Required:</p> <p>a. Ask for copies of both FPL IA audits upon completion (SL&amp;TP uprates and Unit 6&amp;7 Construction).</p>	

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Project Manager

## Bureau of Performance Analysis Interview Summary

<p>Company: Florida Power &amp; Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson</p>	<p>Interview Number: IVS7 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS7</p>
<p>Name: Steve Scroggs Title: Sr. Director Project Development/Power Generation Business Job Experience: From 1984-94 served w/Navy as Nuc. Sub. Offcr.; '94-96 research asst. @ Penn State Masters in Mechanical Engineering; Until 2003 consultant to Power Gen. Indust; In 2003 joined FPL as Mgr. Resource Assessment and Planning; In 7/06 assigned to current role as Sr. Director, Project Development</p>	<p>Date of Interview: 5/7/08 Location: Juno Beach Telephone Number:</p>
<p>(1) Purpose of Interview: To understand FPL's management structure for the New Nuclear Units 6&amp;7 at Turkey Point</p>	
<p>(2) Interview Summary: a.) Steve used a Power-Point presentation to describe his part of the New Nuclear Construction organization, and the status of the project at this early date; Steve discussed that FPL may bid out the construction portion of the project at a later date to bring competition to that portion of the project; FPL is part of the AP1000 Owners Group (APOG) Consortium, and intends to evaluate the benefits of using the APOG to complete the Engineering and Procurement, but may not use the Construction group from the consortium; may bid out the construction portion separately if it is beneficial; considering bidding to major constructors with nuclear experience [REDACTED] competition should help keep the cost of construction lower than if not bid;</p> <p>b.) The organization for the New Units will have largely the same core operations as uprates in project management, but not all detailed plans are complete yet; the uprate is ahead in the process of scheduling; the uprate and new unit organization is separate of each other; Steve noted that the NRC has notified the industry to maintain a separation and balance of personnel resources between existing and new units under construction;</p> <p>c.) Marty Gettler's Group is negotiating major contracts; Bechtel was awarded the contract to complete a Combined Operating and Licensing Agreement (COLA) for the new units in 2007; will see changes to the P.O. to add subcontractors for the core drilling used as geological input for the licensing requirements; have single-sourced application sub-contractors for specific scope; State environmental permitting (15 mos. To Gov.) drives Federal permitting, requiring 2 yrs. for review and an additional yr. of public review (3 yrs. total up to 42 mos.)</p> <p>d.) FPL used a site selection study in '06 to consider numerous sites, including all FPL sites and 15 or more greenfield sites; TP is close to the high demand Miami/Dade population and is close for deliveries of equipment via land and water; the TP site is advantageous because there are multiple generation units within the site, sufficient land is already owned by the company; the site sits on a deep base of coral rock for a strong foundation, and if a problem occurs with one unit it will likely be contained and have no impacts on other units; TP was initially supposed to support six nuclear units when the property was purchased years ago; although the additional units were not built, nuclear units 3&amp;4 were built, along with the coal units as base load generation plants; units 6&amp;7 would provide 2200MW, or about 6%-8% of FPL's capacity; approx. 4000 employees will be on-site for construction at its high point;</p> <p>e.) Nustart is financing the Bellefont (TVA) reference COLA for the NRC process; provides a risk mitigate to applications for the AP1000, and will reduce processing time for others who use the application as a model; FPL will be securing a slot for the AP1000 this year ('08), and late this year will do more work on the construction contract; this yr. doing prep work scope for 2011 site prep activity; FPL is asking for a Limited Work Authorization (LWA) for late in 2010 or early 2011 to begin limited construction; actual construction will</p>	

not begin until 2013; the AP1000 Owners Group (APOG) will do the training of trainers for the new plants (will take approx. 2 yrs. to train new unit operators); Water use is a consideration looking at; will need to have additional source of water for plants and are looking at using treated water as an alternative; will also need to modify infrastructure to plants including widening of roads; a level 3 plan for the COLA will require the monitoring of 2000-2500 activities;

(3) Conclusions: a.) The project is in its early phase, as evidenced by the basic licensing activities for the COLA beginning; b.) Bechtel is the selected contractor for completing the COLA; FPL is part of the AP1000 Owners Group (APOG) Consortium, and intends to evaluate the benefits of using the APOG to complete the Engineering and Procurement; c.) the uprate and new unit organization is separate of each other; Steve noted that the NRC has notified the industry to maintain a separation and balance of personnel resources between existing and new units under construction; d.) Marty Gettler's Group is negotiating major contracts; Bechtel was awarded the contract to complete a Combined Operating and Licensing Agreement (COLA) for the new units in 2007; e.) TP is close to the high demand Miami/Dade population and is close for deliveries of equipment via land and water; the TP site is advantageous because there are multiple generation units within the site, sufficient land is already owned by the company; the site sits on a deep base of coral rock for a strong foundation, and if a problem occurs with one unit it will likely be contained and have no impacts on other units; f.) FPL will be securing a slot for the AP1000 this year ('08), and late this year will do more work on the construction contract; this yr. doing prep work scope for 2011 site prep activity; FPL is asking for a Limited Work Authorization (LWA) for late in 2010 or early 2011 to begin limited construction; actual construction will not begin until 2013; g.) the AP1000 Owners Group (APOG) will do the training of trainers for the new plants (will take approx. 2 yrs. to train new unit operators) h.) will need to have additional source of water for plants and are looking at using treated water as an alternative; will also need to modify infrastructure to plants including widening of roads;

(4) Date Request(s) Generated:

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(5) Follow-up Required:

1.) Review Bechtel contract 2.) Identify other contracts to be completed during 2008 3.) monitor progress on continuing site prep and construction contract activity later this year, including AP1000 slot.

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Project Manager

## Bureau of Performance Analysis Interview Summary

<p>Company: Florida Power &amp; Light          Area: Nuclear Controls Review          Auditor(s): L. Fisher/C. Vinson</p>	<p>Interview Number: IVS8          File Name: I:\Bureau Performance Analysis\          Performance Analysis Reports\Nuclear          Construction\FPL Uprate\IVS8</p>
<p>Name: Don Fleetwood, Rob Regan, Skip Gwynn          Title: Project Controls Mgr./ Bus. Svs., Mgr. Proj.          Devel./Power Gen. Bus. Svs., Mgr. Const./Bus. Svcs.          Job Experience:</p>	<p>Date of Interview: 5/7/08          Location: Juno Beach          Telephone Number:</p>
<p>(1) Purpose of Interview: To understand FPL's management structure for the New Nuclear Units 6&amp;7 at Turkey Point and the associated controls for project and contract management</p>	
<p>(2) Interview Summary: a.) This group supports both Steve Scroggs and Marty Gettler's organizations in completing the licensing and construction of new Units 6&amp;7; Don Fleetwood, Project Controls Manager, supports the organization by managing the project costs and schedule, and reporting the latest status to executive management; Don has a Scheduler and Budget Analyst reporting to him; Don uses Primavera ver. 3.0 for monitoring and reporting of the project schedule; a monthly Dashboard view of the project is provided to executive management to keep them aware of the status of the project and performance measurements; Has <i>monthly meetings to review contractor performance and weekly update calls on Monday to advise of any problematic areas</i>; monitors critical path events and scope changes affecting the schedule; Risk Tracker provides update of project primary risks; Don tracks all scope changes on a trend ledger which indicates the number of changes and dollars for scope changes for each vendor; Bechtel has four scope changes so far w/possible schedule delay implications, that will not impact long term project completion; Four Bechtel scope changes due to wet site conditions during core boring, water option/decision assistance, change in wage rates, multiple PSCD; Don monitors vendor contracts, and amendments to the contracts, against vendor performance and invoices;</p> <p>b.) Don works for Skip Gwynn, Manager Construction/Business Services, who is responsible for reporting the project financials to executive management; Skip provides a monthly financial view used in the Monthly Project Meetings; Sip provides views of the approved budget vs. actual costs, a cash flow forecast to actual, and answers any specific management requests for financial reporting data; Skip reports directly to Bob McGrath and indirectly to Steve Scroggs, Sr. Director Project Development.</p> <p>c.) Rob Regan reports directly to Steve Scroggs, Sr. Director Project Development, and began work on the project in December '07; Rob is over Crisis Development, and his role is acting as a liaison w/the licensing group; Rob is involved in water and land use issues for the project and acts as a liaison with internal and external organizations regarding environmental issues related to the site; for example, Rob is involved w/the reclaimed water project, transmission design and implementation project, coordinates the project management program under development in Project Bluegrass, on-site land use and fill project decisions for the new units, and is a liaison between environmental services and outside agencies;</p>	
<p>(3) Conclusions: a.) The Project Controls Group, headed by Skip Gwynn, is responsible for monitoring the project schedule and costs and reporting the status of the project upward to executive management; this group also monitors contractor performance and invoices to assure contractor deliverables are completed before invoices are paid; b.) The monthly Dashboard provides executive management with a summary of project scheduling and financial status; c.) Rob Reagan acts as liaison to support the project and coordinate internal and external efforts relative to environmental, regulatory affairs, Communications, Project Controls and Legal</p>	
<p>(4) Date Request(s) Generated:</p> <p>No. _____          No. _____          No. _____</p>	



(5) Follow-up Required:

- 1.) Bob McGrath's title?
- 2.) Copy of the most current monthly dashboard
- 3.) Transmission Study when completed

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Project Manager

## Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson	Interview Number: IVS9 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS9
Name: Steve Scroggs Job Experience:	Date of Interview: 5/7/08 Location: Juno Beach Telephone Number:
(1) Purpose of Interview: To understand FPL's management structure for the New Nuclear Units 6&7 and the potential use of affiliated employees in the organization	
(2) Interview Summary: a.) the new unit organization will be different than the uprate in that it will be primarily FPL employees and contractors to complete the project; if the need arises for specialized expertise and it is available through the organization it will be used for specific scope applications; for example, in water resources, if the organization has a specialist that could provide assistance in this area we might use them until the scope of work is completed and then those people would leave the project; the new nuclear unit organization will have very few affiliate employees involved; b.) <span style="background-color: black; color: black;">[REDACTED]</span>	
<span style="background-color: black; color: black;">[REDACTED]</span>	
EPC; Steve stated that if the industry had not developed NuStart and engaged the NRC to develop a more standard COLA approach, none of the benefits of the standard COLA would have been available; each company would be submitting their COLA w/o the knowledge gained from the standard COLA format; c.) Marty Gettler is FPL's project liaison with NuStart and attends the meetings; d.) Kathy Welch requested a listing of the benefits of NuStart in her DR-6, which we will request from FPL	
(3) Conclusions: a.) The new FPL nuclear organization will have very few affiliate employees and would use affiliate personnel in limited conditions where specialized experience and expertise would be required; b.) Shaw does not presently offer any performance and scheduling guarantees c.) Marty Gettler is FPL's project liaison with NuStart and attends the meetings d.) Kathy Welch requested a listing of the benefits of NuStart in her DR-6, which we will request from FPL	
(4) Date Request(s) Generated: No. _____ No. _____ No. _____	
(5) Follow-up Required: a.) Request FPL's responses to Kathy Welch's DR requesting a listing of the benefits of NuStart;	

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Project Manager

## Bureau of Performance Analysis

### Interview Summary

Company: Florida Power & Light  
 Area: Nuclear Controls Review  
 Auditor(s): L. Fisher/C. Vinson

Interview Number: IVS10  
 File Name: I:\Bureau Performance Analysis\  
 Performance Analysis Reports\Nuclear  
 Construction\FPL Uprate\IVS10

Name: Hector Sanchez, David Weda, Jeff young, Pam  
 Sonnelitter, Cheryl Dietrich, Eric Meslin, Steve  
 Scroggs, Tiffany Cordes, Bill Labbe  
 Job Experience:

Date of Interview: 5/7/08  
 Location: Juno Beach  
 Telephone Number:

(1) Purpose of Interview: To understand FPL's Transmission Studies and Assessments regarding the uprates and new units 6&7

(2) Interview Summary: a.) Hector is the Director Transmission Services Planning; his group does technical studies of system requirements, sizing of lines, transformers, and connection of the generator to the transmission system; His group evaluates the detailed requirements the transformers, breakers, protection, etc. for the project and marry the results to real life needs through an iterative process of evaluations b.) Ron is with Project Management & Engineering and his group takes a look at reliability, and for potential flaws in design and operability; his group looks at the design to determine Constructability, Reliability, Maintainability, and Loss (CRML); considers when the project is needed and pieces together the schedule of when the work should begin and the resources are needed to meet the schedule; also make decisions regarding Right of Way and permitting necessary to the project; this group completes the scoping, scheduling, engineering and secures the necessary forces to complete the project; c.) FPL is getting close to having the final Turbine Generator specs and should have the Transmission study complete in the next couple of mos.; all work must be compliant w/NERC rules d.) With regard to the transmission related to the uprates, there will be no additional transmission needed beyond the switchyard for the uprates d.) For the new units, 2 of 3 alternatives have been completed, should have completed by end of '08 to go to '09 application; different routes are being studied to take transmission North or West; initial costs included an estimate in the filing (high level), but will be getting more detailed construction costs from the study; Routing and design solutions will dictate the dollars and time frames for the project; routes should be to DEP by the end of '08 as part of the application; another year or so after the route is decided should have high level budget and schedule for transmission project; late 2009 should have an estimate of transmission costs and schedule; would also have annual feasibility analyses; eventually one report will go to the FRCC e.) once high level needs assessment is completed the final input to planning and costing support for interconnection to the generator is reported; Eric and Cheryl gather information and provide input to management, and budgeting and reporting svcs. and provide support to the existing units for the uprate (Don Fleetwood and Skip Gwinn are counterparts for new Nukes);

(3) Conclusions: a.) FPL is getting close to having the final Turbine Generator specs and should have the initial Transmission study complete in the next couple of mos.; b.) For the new units, 2 of 3 alternatives have been completed, should have completed by end of '08 to go to '09 application c.) routes should be to DEP by the end of '08 as part of the application; another year or so after the route is decided should have high level budget and schedule for transmission project; late 2009 should have an estimate of transmission costs and schedule; d.) eventually one report will go to the FRCC e.) once high level needs assessment is completed the final input to planning and costing support for interconnection to the generator is reported;

(4) Date Request(s) Generated:

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(5) Follow-up Required:

1. Ask for Transmission study when completed

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Project Manager

## Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson	Interview Number: IVS10 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS10
Name: Hector Sanchez, David Weda, Jeff young, Pam Sonnelitter, Cheryl Dietrich, Eric Meslin, Steve Scroggs, Tiffany Cordes, Bill Labbe Job Experience:	Date of Interview: 5/7/08 Location: Juno Beach Telephone Number:
(1) Purpose of Interview: To understand FPL's Transmission Studies and Assessments regarding the uprates and new units 6&7	
(2) Interview Summary: a.) Hector is the Director Transmission Services Planning; his group does technical studies of system requirements, sizing of lines, transformers, and connection of the generator to the transmission system; His group evaluates the detailed requirements the transformers, breakers, protection, etc. for the project and marry the results to real life needs through an iterative process of evaluations b.) Ron is with Project Management & Engineering and his group takes a look at reliability, and for potential flaws in design and operability; his group looks at the design to determine Constructability, Reliability, Maintainability, and Loss (CRML); considers when the project is needed and pieces together the schedule of when the work should begin and the resources are needed to meet the schedule; also make decisions regarding Right of Way and permitting necessary to the project; this group completes the scoping, scheduling, engineering and secures the necessary forces to complete the project; c.) FPL is getting close to having the final Turbine Generator specs and should have the Transmission study complete in the next couple of mos.; all work must be compliant w/NERC rules d.) With regard to the transmission related to the uprates, there will be no additional transmission needed beyond the switchyard for the uprates d.) For the new units, 2 of 3 alternatives have been completed, should have completed by end of '08 to go to '09 application; different routes are being studied to take transmission North or West; initial costs included an estimate in the filing (high level), but will be getting more detailed construction costs from the study; Routing and design solutions will dictate the dollars and time frames for the project; routes should be to DEP by the end of '08 as part of the application; another year or so after the route is decided should have high level budget and schedule for transmission project; late 2009 should have an estimate of transmission costs and schedule; would also have annual feasibility analyses; eventually one report will go to the FRCC e.) once high level needs assessment is completed the final input to planning and costing support for interconnection to the generator is reported; Eric and Cheryl gather information and provide input to management, and budgeting and reporting svcs. and provide support to the existing units for the uprate (Don Fleetwood and Skip Gwinn are counterparts for new Nukes);	
(3) Conclusions: a.) FPL is getting close to having the final Turbine Generator specs and should have the initial Transmission study complete in the next couple of mos.; b.) For the new units, 2 of 3 alternatives have been completed, should have completed by end of '08 to go to '09 application c.) routes should be to DEP by the end of '08 as part of the application; another year or so after the route is decided should have high level budget and schedule for transmission project; late 2009 should have an estimate of transmission costs and schedule; d.) eventually one report will go to the FRCC e.) once high level needs assessment is completed the final input to planning and costing support for interconnection to the generator is reported;	
(4) Date Request(s) Generated: No. _____ No. _____ No. _____	
(5) Follow-up Required: 1. Ask for Transmission study when completed	



## Bureau of Performance Analysis Interview Summary

<p>Company: Florida Power &amp; Light          Area: Nuclear Controls Review          Auditor(s): L. Fisher/C. Vinson</p>	<p>Interview Number: IVS11          File Name: I:\Bureau Performance Analysis\          Performance Analysis Reports\Nuclear          Construction\FPL Uprate\IVS11</p>
<p>Name: Mark Waronicki, Bill Labbe, Steve Hale, Clyde Newson, Cheryl Dietrich, Eric Meslin; Tiffany Cordes          Job Experience:</p>	<p>Date of Interview: 5/7/08          Location: Juno Beach          Telephone Number:</p>

(1) Purpose of Interview: To understand FPL's bidding, purchasing and contracting processes and discuss contractor evaluation and quality assurance

(2) Interview Summary: a.) Reviewed the contract information for existing contracts > \$200K and the approved scope revisions, PO dollar changes, how the contracts tie to the POs and the methodology for checking the invoice against the contract; b.) Clyde Newson, Cost Engineer, Uprate Project receives the contractor invoice and sends it to the SME (tech rep) to ensure the scope of work has been completed; Clyde Newson, Cost Engineer, Uprate Project, checks PASSPORT to insure that adequate funding is available to make payment; on fixed-price contracts Clyde matches up the invoice amount and the deliverable work received from the SME and passes to the appropriate level for payment; c.) revisions for value added scope changes are updated with the scope change information, and sent to the appropriate level for signature; Each line separates the change for the appropriate unit, thus specifying the change and approved dollar amount for the particular unit; On T&M projects Clyde does his own checking against contractor time reports and charges on the invoice; once verified the invoice is passed up the line for appropriate executive approval;



(3) Conclusions: a.) Clyde Newson, Cost Engineer, Uprate Project receives the contractor invoice and sends it to the SME (tech rep) to ensure the scope of work has been completed; Clyde Newson, Cost Engineer, Uprate Project, checks PASSPORT to insure that adequate funding is available to make payment; on fixed-price contracts Clyde matches up the invoice amount and the deliverable work received from the SME and passes to the appropriate level for payment; On T&M projects Clyde does his own checking against contractor time reports and charges on the invoice; once verified the invoice is passed up the line for appropriate executive approval; b.) Siemens has a global agreement with FPL through 2012; FPL unsure if this is the only contract with this contract length; quality levels are assigned different vendors capability; c.) the contractor performance evaluation report is referred to as CPER and has been used on larger contractors doing larger volumes of work for the company; CPER documentation may be hit and miss, but the uprate project requires the completion of

CPERs each year, or at the end of the contract; d.)

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(5) Follow-up Required:

a.) follow-up to get more specifics on \$14 million, and penalties assessed Siemens, and any other documentation of Siemens performance for previous years

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Project Manager



## Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson	Interview Number: IVS12 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS12
Name: Martin Gettler, VP New Nuclear Projects Job Experience:	Date of Interview: 5/8/08 Location: Juno Beach Telephone Number:

(1) Purpose of Interview: To understand FPL's New Nuclear Unit 6&7 organizational structure

(2) Interview Summary: a.) Last year Martin Gettler was over the uprate project and Bill Labbe and Steve Hale reported to him; effective 1/08 he has responsibility for the New Nuclear Projects TP 6&7; his group's focus is the COLA, and Bill Maher is the License Director responsible for the COLA; he has a tight schedule, but is working to complete the COLA by March '09; the license application is split into the R-COLA and the S-COLA; the S-COLA goes back to the COLAs issued by the NRC prior to the possible delays predicted by the NRC due to budget cuts; there are anticipated FY '09 budget cuts expected at the NRC, which may impact/delay applications submitted after 10/08; the application is taken in order of submittal and would be docketed after that date, but would be slowed for review if filed after 10/08; therefore, a 42 month approval window, instead of 36 month window, for the license might be experienced; b.) current work is in site specifications, Engineering Impact Statement, Geology, Meteorology, and Hydrology; FPL notified NRC of their intent to file a Limited Work Authority (LWA) w/the COLA submittal, which would allow work on out buildings, etc. while the license is being reviewed; c.) The Integrated Testing Acceptance Criteria (ITAC) is included in the COLA, and describes the process to verify components once built meet design specs. e.g. pressure test, compression test, and system test; NuStart and EEI are working on making application consistent to avoid unique plant confusion; details are still being worked out; construction tests feed into ITAC, but are performed w/in the construction processes; if additional information is required, the NRC issues a Request for Additional Information (RAI) which is tracked and received for all other AP1000s to cover in their COLA to prevent repeat mistakes; d.) FPL is number 5 in line for the AP1000 and believe they will benefit from learning about the other installations; the Design Certification Document is completed, but issues are being resolved w/the NRC; refinements to amend the DCD are being addressed currently; e.) On the construction side of the house Steve Reuwer, Engineering & Construction-Director of Construction is not yet full time and is hiring a Construction Manager and Engineering Manager; Project Controls are already in place w/ Don Fleetwood, to support both sides of the organization; currently negotiating the EP contract w/SS&W; the remaining portion of the organization will depend on how the organization is broken up and hired out; there are several options to determine how to arrange the EPC; and some will cause Marty to have more staff than other options; is waiting on the Construction end and getting more engineering done; Could have different engineer do BOP as an option; based on risk and costs he may be able to get a better price with reduced risk; f.) Kelly Shaw and Mike Reynolds (ISC) are dedicated to the new units; Kelly Shaw and Marty Geller are the prime negotiators for the EP contract g.) QA/QC Rick Weiss still reports to Bob Acosta (part of NRC requirement) since Bob has approved QA plan and Gettler does not; h.) Antonio Fernandez is the licensing attorney and Bill Blair is the contract atty. For the new units i.) needs to fill the training coordinator and get an early start on simulator; industry working together on a train the trainer program for members to train their operators; FPL is deciding now how much to participate; have been mostly watching what direction NuStart and APOG are taking; Contract Admin. goes back to the requesting organization for the contract, and Kelly and Mike assist w/contracting rules interpretations;

(3) Conclusions: a.)

(4) Date Request(s) Generated:  
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(5) Follow-up Required:

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Project Manager

## Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson	Interview Number: IVS13 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS13
Name: Steve Hala, Bille Labbe, Clyde Newson Job Experience:	Date of Interview: 5/8/08 Location: Juno Beach Telephone Number:
(1) Purpose of Interview: Update on the uprate staffing, procedures and controls, and scoping activities since our March meeting	
(2) Interview Summary: a.) The Engineering Group is looking for an additional 4 people by June; Turkey Point is an area of concern for ramp-up, and FPL will be using additional contract engineering from Sargent & Lundy and others to fill the need; a new PO w/SS&W has been completed for the BOP; will also be needing civil and licensing engineers b.) At the sites and in Juno uprate staff continues to implement procedures covering EPU project expectations and roles and responsibilities; these procedures will grow with the organization and be reviewed in the future as project scope changes; training on procedures is mostly read and sign, but provide training for staff if needed; c.) BOP Licensing Engineering has occurred since our last visit in March; currently working on the Scope of Turkey Point and should have contracts in the next few weeks; intend on having the design packages on site 18 months ahead of actual work and the equipment on-site 3 months early; going through design , basis, accident analysis considering what could possibly happen and mitigating any risks associated with completing the EPU work; for example, consideration is given to anything that could cause a Loss of Cooling Accident (LOCA) and what actions to take in the event of such an accident; every possible risk is considered and documented, with appropriate actions to take in the event of such an incident, prior to beginning the scheduled EPU work; this provides assurance that all planned work goes smoothly and can be completed w/in the scheduled outage window; weekly meetings are being held w/Transmission re: the needs at each of the units in the uprate;	
(3) Conclusions: a.) The Engineering Group is looking for an additional 4 people by June; Turkey Point is an area of concern for ramp-up, and FPL will be using additional contract engineering from Sargent & Lundy and others to fill the need; b.) new PO w/SS&W has been completed for the BOP c.) At the sites and in Juno uprate staff continues to implement procedures covering EPU project expectations and roles and responsibilities d.) currently working on the Scope of Turkey Point and should have contracts in the next few weeks; intend on having the design packages on site 18 months ahead of actual work and the equipment on-site 3 months early; e.) going through design , basis, accident analysis considering what could possibly happen and mitigating any risks associated with completing the EPU work	
(4) Date Request(s) Generated: No. _____ No. _____ No. _____	
(5) Follow-up Required: 1. Request contract/PO for SS&W for the BOP 2. Request Contract/PO for Sargent & Lundy	

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Project Manager

## Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light  
Area: Nuclear Controls Review  
Auditor(s): L. Fisher/C. Vinson

Interview Number: IVS14  
File Name: I:\Bureau Performance Analysis\  
Performance Analysis Reports\Nuclear  
Construction\FPL Uprate\IVS14

Name: Kelly Sahw & Mike Reynolds  
Job Experience: Kelly 4-5 mos. w/ FPL; previously 35 yrs. w/Siemens and ABB; experience in sales and sourcing;  
Mike w/FPL 7-8 yrs. has been in nuclear supply chain sourcing; did some work w/Combustion Engineering in field start-up and testing; also experience w/navy nuclear submarines

Date of Interview: 5/8/08  
Location: Juno Beach  
Telephone Number:

(1) Purpose of Interview: To understand the processes and controls for Supply Chain operations in the new nuclear units 6&7

(2) Interview Summary: a.) Prior to the new units 6&7, Nuclear Supply Chain was separate; now it is part of the Integrated Supply Chain (ISC), but follows NSC procedures; new procedure for the new nuclear group combines the ISP and NSP procedures; safety-related material items are necessary for the safe shut-down of the plant; vendors of safety-related item must follow more stringent procedures and these vendors must have a NRC-approved nuclear quality assurance program and an FPL-approved QA program; the approval levels are the same as the corporate procedures; have procurement engineering for safety-related vendors and can only send a request to an approved safety-related vendor; procedures are worked and referenced daily to reflect oversight and make sure orders are completed properly; b.)

c.) Integrated Supply Chain maintains the vendor performance statistics for designated top vendors and is the owner of the contract for non-safety related contracts; for long term vendors the reviews are quarterly or semi-annual; the statistics are not required by procedures by top 50 or top 10; QA has a separate process for evaluation of safety-related contractors; if a problem occurs w/a non-safety vendor the ISC would look at the contract requirements and determine whether an employee caused the problem; if the employee caused the problem the problem would be handled as a liability; if a subcontractor was involved there are insurance levels specified in the contract that will address specific relief; the Risk Dept. is included in determining the risk elements in the contract terms; on small vendors, liquidated damages may not be useful because the vendor would be terminally harmed (causing them to go out of business); contract incentives are developed on a case-by-case basis; d.) Time & Materials is used rather than fixed-cost when the business unit recommends and the firmness of scope play a role in the decision to use T&M; e.) Contracts under negotiation; will soon award contract for least evaluated cost authorized early work, but final order not done;

(3) Conclusions: a.) Prior to the new units 6&7, Nuclear Supply Chain was separate; now it is part of the Integrated Supply Chain (ISC), but follows NSC procedures; new procedure for the new nuclear group combines the ISP and NSP procedures; vendors of safety-related item must follow more stringent procedures and these vendors must have a NRC-approved nuclear quality assurance program and an FPL-approved QA program; b.)

the an existing contract c.) Integrated Supply Chain maintains the vendor performance statistics for designated top vendors and is the owner of the contract for non-safety related contracts d.) if a problem occurs w/a non-safety vendor the ISC would look at the contract requirements and determine whether an employee caused the problem; if the employee caused the problem the problem would be handled as a liability; if a subcontractor was involved there are insurance levels specified in the contract that will address specific relief; the Risk Dept. is included in determining the risk elements in the contract terms e.) Time & Materials is used rather than fixed-cost when the business unit recommends and the firmness of scope play a role in the decision o use T&M

(4) Date Request(s) Generated:

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(5) Follow-up Required:

- 1.) Determine whether new procedure for the new nuclear group that combines the ISP and NSP procedures has been provided
- 2.) Determine whether the nuclear contract approval levels, same as the corporate procedures, have been provided;
- 3.) Request ISC vendor performance statistics for all vendors currently used for the uprate or the new nuclear units;
- 4.) Request QA vendor performance for all safety-related vendors used for the uprate or the new units
- 5.) Request a list of all vendor contracts in which FPL has assessed liquidated damages during the period 2006-2008 to-date, the amount of damages requested by FPL, and the amount of damages collected.

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Project Manager

## Bureau of Performance Analysis Interview Summary

Company: Florida Power & Light Area: Nuclear Controls Review Auditor(s): L. Fisher/C. Vinson	Interview Number: IVS15 File Name: I:\Bureau Performance Analysis\ Performance Analysis Reports\Nuclear Construction\FPL Uprate\IVS15
Name: Rick Bob Acosta, Rick Weis, Chris Lloyd Job Experience: Bob-Director Nuclear Assurance, Rick-Supv. Qual. Assur. Nuc. Assur. Perf. Assmt. (6&7) Chris- Supv. Qual. Assur. Nuc. Assur. Perf. Assmt (uprates)	Date of Interview: 5/8/08 Location: Juno Beach Telephone Number:

(1) Purpose of Interview: To understand the QA organization and process for the uprate and new nuclear units

(2) Interview Summary: a.) Bob Acosta, Director of Nuclear Assurance reports directly to Art Stall, and has oversight of the entire nuclear fleet; there are five nukes in the FPL/E fleet; he is responsible for the employee concerns program which investigates privately and independently from other organizations; he is on the company's Nuclear Review Board consisting of nuclear management from FPL/E and outside consultants to provide outside perspective; there is a requirement for safety boards at each site; Bob also has a Vendor Audit Group completes audits/assessments at each of the plants; Jeff Bassinger has 10 auditors within the Vendor Audit Group for the entire fleet; the output of the audit is a report in all cases (audit reports, survey reports, and surveillance reports, depending on the particular area being assessed; 10CFR50 Appendix B defines the type of audit performed; safety-related products used to be audited every 3 yrs.; b.) Rick Weis is supervisor of the QA function for the new units (6&7) and Chris Lloyd is the Supervisor QA over the uprates; The QA supervisors have on-site oversight of each plant and target key areas of risk; largely the same effort is made for the uprate and the new units as on other major construction projects (e.g. the steam generator replacement); The supervisor is meshed into the on-site organization, and is involved in on-site and off-site meetings to remain aware of key risks and issues impacting the project schedule, cost, and quality; additional resources will be added to the new units if needed; Bob Acosta is adding a Director in place under him for the South area covering two plants (TP&SL) and will be adding a Director for the Northern Plants; c.) the Vendor Audit Program is used to assure that vendors provide products meeting technical specifications and requirements for use on FPL/E nuclear units; once scope is evaluated vendor qualifications to meet nuclear qualifications are audited; Rick has more than 10 yrs. experience as a vendor auditor for major components making technical assessments of materials; reports are completed monthly for subs and even sub/sub level for suppliers of products to FPL/E (e.g. tubing on steam generator- he would go to the tubing mill to review product specifications and quality; d.) A Project Plan for the uprate is being prepared by Chris Lloyd for Juno and TP & SL plants; specifications are being developed to require QA sign off on all procurements if the vendor works under the Chris is in the gathering mode and should be in report production w/in the next 2-3 months; e.) Bob Acosta mentioned that NUPIC combines efforts in contractor reviews and share results of the reports; approx. 10 auditors are at the site for a week to complete the NUPIC audit and share resources to complete the audit at the manufacturers plant; a surveillance targets specific issues e.g. design contract issue whether components are up to spec.; an audit examines programs, procedures, and evidence; Determining when to audit or survey-sometimes the NRC gives input, sometimes due to a part or component failure, and sometimes due to the industry identifying a problem ( i.e. regulatory incident based); f.) Counterfeit parts are a very big concern for new builds because many of the suppliers are overseas; counterfeit parts are an industry problem and require constant vigilance by QA and the entire organization; ASME Section 8 discusses inspection and stamping program; QA inspects the plants and products for vendors supplying parts and equipment; vendors are required to perform tests and demonstrate that their product meets co. and industry specifications and requirements; Additional testing by x-ray, florescent, chemical and hardness tests are also completed ;the supply chain examines parts as they are received for

supplier for codes to identify the part; inspectors are trained to observe for fraudulent parts; codes have been placed on equipment parts to help assure only genuine parts are received and used, unless otherwise ordered by FPL as a replacement for the OEM part; g.) Planning at new plant- Westinghouse is supporting the COLA effort by Bechtel; SDN is when a supplier suggests a change in a part be approved, not as a result of FPL finding a problem.

(3) Conclusions: a.) Vendor Audit Group completes audits/assessments at each of the plants; Jeff Bassinger has 10 auditors within the Vendor Audit Group for the entire fleet; the output of the audit is a report in all cases (audit reports, survey reports, and surveillance reports, depending on the particular area being assessed; Vendor Audit Program is used to assure that vendors provide products meeting technical specifications and requirements for use on FPL/E nuclear units; b.) 10CFR50 Appendix B defines the type of audit performed by QA; safety-related products used to be audited every 3 yrs.; c.) Bob Acosta is adding a Director in place under him for the South area covering two plants (TP&SL) and will be adding a Director for the Northern Plants; d.) Counterfeit parts are a very big concern for new builds because many of the suppliers are overseas; counterfeit parts are an industry problem and require constant vigilance by QA and the entire organization; ASME Section 8 discusses inspection and stamping program; e.) Bob Acosta mentioned that NUPIC combines efforts in contractor reviews and share results of the reports; approx. 10 auditors are at the site for a week to complete the NUPIC audit and share resources to complete the audit at the manufacturers plant.

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(5) Follow-up Required:

1. Get copies of QA assessments, reports and audits on FPL nuclear units during 2006 to date
2. Review ASME Section 8 document
3. Get all NUPIC audits performed on FPL nuclear units during 2006-present
4. Get all Vendor audits completed on FPL nuclear units during 2006-present

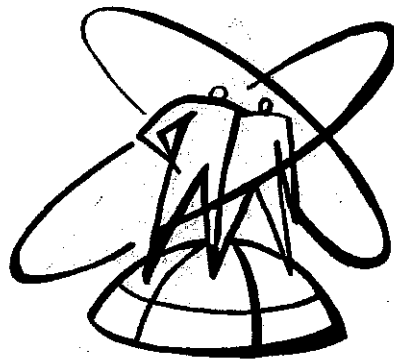
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Project Manager

Part III

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# FLORIDA POWER & LIGHT COMPANY



## NUCLEAR CONTROL REVIEW

TURKEY POINT AND ST. LUCIE UPDATES  
New Nuclear Turkey Point Units 6 & 7

Workpapers  
Interview Summaries (1-15)  
and Document Control Logs (DR-1,2,4,5,6, & 7)



## Bureau of Performance Analysis

### Document Summary and Control Log

**Company:** Florida Power & Light Company  
**Area:** Nuclear Uprate Review  
**Auditor(s):** Vinson/Fisher

**Workload Control #:** PA-08-01-002  
**File Name:** I: /// FPL DR1 Summary & Log.doc

**Document #:** Dr-1.1.a  
**Date Requested:** 3/10 for 3/21  
**Date Received:** 3/21  
**Comments:** (i.e., Confidential)  
  
**CONFIDENTIAL**  
 (5) Nuclear uprate Analysis results for several runs.  
 (8) St. Lucie units 1&2 EPU Study, Executive Summary Report, SS&W DRAFT  
 (9) Turkey Point Nuclear Plant EPU Study, Executive Summary Report, SS&W DRAFT  
 1.1a Supplemental response 1 7/3/08  
 1.1a Supplemental response 2 7/3/08  
 1.7a Supplemental response 3 7/3/08

**Document Title and Purpose of Review:** a. Please provide current copies of all project planning documents for the Turkey Point and St. Lucie uprate projects.

**Summary of Contents:** Includes a.) Nuclear Uprate Analysis (confidential) b.) SL1&2 EPU Feasibility Rept. And Recs. 6/07-7/07(confidential) c.) TP EPU Study, Exec. Summ. Rept., Shaw, Stone & Webster Final Draft (confidential) d.) SL Activities List and e.) TP Activities List (See Tab 1) ;FPL SUPPLEMENT 1 OF 7/3/08; FPL Turkey point preliminary study conducted second quarter 2007(however, some information is included from early in 2006 which evaluates Turkey Point thermal uprate scoping, condenser inspection (Burns Engineering); the thermal uprate scoping of Turkey Point was shown by equipment item numbers that were studied, assessed and projected costs were assigned; THIS DOES NOT APPEAR TO BE THE SAME REPORT AS THE ONE INITIALLY PROVIDED FOR ST. LUCIE, but does show FPL evaluated the thermal uprate possibilities, and historical problems associated with Turkey Point as part of its consideration of the uprate planning; SUPPLEMENTAL RESPONSE 1 OF 7/3/08; Turkey Point/St. Lucie EPU Board Presentation 10/17/07 (51 pgs.) ; Back-up slides 1-61; Board presentation dated 10/17/07 (pgs. 41-45) shows Lessons Learned (pg. 50) shows benchmarking of uprates performed on PWR plants; Total of 70 uprates performed on PWR plants, 25 MUR (0-2%), 40 Stretch PU (< or = 7%), and 5 EPU (>7%); Backup slide PSL Strategy to minimize Risk shows back-out strategy for major components is to minimize early progress payments and negotiate favorable cancellation charges; LOW PRESSURE TURBINES- reserve spot for rotor forging will require deposit of \$1.1 million in 2007; additional material costs of \$5 million in 2008;

Webster Turkey Point Extended Power Uprate Study; this is the entire report of which only the executive summary was originally provided; this is a DRAFT phase two BOP Extended Power Uprate Study completed December 17, 2007; includes the 11/06/07 Turkey Point Walk down of unit 3&4 Heaters & MSRs and turbine Deck; 11/06/07 walk down of LP FW Neck Heaters EPU Scope; also includes 11/06/07 plant walk down of Unit 3&4 Main Steam Valves as part of the EPU scope; This report was later provided in final form in February 2008 to FPL.

**Conclusions:** 1) Nuclear Uprate Economic Analysis (pg 1 of 8) all appear to be similar although with different assumptions;

**Data Request(s) Generated:**

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**Follow-up Required:** 1.) check reasons why SL2 goes through 3 outages to get uprate power increase. 2.) Determine whether contracts contain penalty clauses, or money at risk, for contractors not meeting performance expectations 3.) Get the scaled up parameters compared to Beaver Valley Units 1&2 parameters @ 2689 MWt and Surry Units 1 &2 component sizes from SS&W TP EPU Study 4.) TP 3&4 BOP Engineering Report for 2300 MWt Uprate and plant data by FPL for SS&W TP EPU Study 5.) FU on High/High/High items on BOP Risk Assessment and compare estimate vs. cost

**Document #:** DR-1.1.b  
**Date Requested:** 3/10 for 3/21  
**Date Received:** 3/21/08

**Document Title and Purpose of Review:** b. Please list and describe the planning and design documents and/or systems used to support, develop and maintain the project plan for the Turkey Point and St. Lucie uprate projects.

**Summary of Contents:** a.) NAP-401, Project Management procedure contains sections for Purpose, Scope, Responsibilities,

<p><b>Document #:</b> DR-1.2.b  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> b. Please list and describe the project management documents and/or systems used to track work completion and schedule status for the Turkey Point and St. Lucie uprate projects.</p> <p><b>Summary of Contents:</b> a.) EPU Core Team Standing Meeting Schedule b.) Site <i>Daily Call</i> is conducted every business day by teleconference between all EPU sites; report on daily activities, including safety, operating experience reports, self-improving discussion, contract preparations, schedule and cost reviews, issues and challenges, near term milestones, Engineering activities and action items; c.) Several small meetings where Project Management is kept up-to-date are: 1.) The <i>EPU Strategy Meeting</i> 2.) <i>Site Schedule Meetings</i> 3.) <i>Integrated Supply Chain (ISC) Interface Meetings</i> 4.) In addition to meeting schedule each site is responsible for a written weekly report, compiled into the <i>weekly project report</i>; 5.) <i>Extended Power Uprate (EPU) Daily Conference Call</i>; an example of the Engineering activities for EPU Conference call is attached 6.) A level 1 example of the scheduling effort used on the EPU Project is provided including milestones, engineering, modification packages, equipment on-site deliveries, and outage installations d.) Project Administration (Bill Ball) has modified the following EPPI Series procedures during February and March 2008: EPPI series 100-600, Index, and Forms have been updated for the EPU (See Tab 2)</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> DR-1.3.a  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> a. Please provide current copies of all contractor evaluation and quality assurance documents for the Turkey Point and St. Lucie uprate projects.</p> <p><b>Summary of Contents:</b> a.) QI-7-PSL-1 Appendix F (pgs. 44-46 of 55), Contractor Performance Evaluation Report shows the form used to document contractor performance in six areas: 1) Quality of Work, 2) Schedule Compliance, 3) Organization and Management 4) Responsiveness and Cooperation, 5) Safety, 6) ALARA; includes questions for recommended improvements to supplier's performance, and aspects of the supplier's performance that are superior; Contracts Agent completes future corrective action for supplier and whether supplier should be removed from bid list (See Tab 3) b.) QI-7-PTN-5 Turkey Point Nuclear Plant Control of On-Site Services revised 6/16/03 (9 Pgs.) w/sections 1.0 Purpose, 2.0 References/Records/Commitment Documents 3.0 Responsibilities, 4.0 Definitions, 5.0 Procedure Section 2.0 Records QA records shall be transmitted to QA Records for retention in accordance w/ QA Records Program; The Quality Manager performs audits and/or surveillances on safety and quality related services when they are performed under the contractor's QA Program; section 5.0 includes Site Technical Representative responsibilities for on-site requisitions for contractor services including contractor quality, timeliness, and error free performance; (See Tab 3) c.) The EPU Project is in the early stages and has not yet used these quality documents in the project; these documents and the entire nuclear quality program will apply to the EPU Project as appropriate; d.) FPL EPU Contract Compliance Index is a spreadsheet (6 Pgs.) showing the scope of activities for different FPL sites providing Contract Manager responsibilities, effective and completion dates, contract value, and comments and changes. (See Tab 7)</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b> 1.) Review any QA records re: SL and TP uprate projects completed to-date 2.) Review QA audit review plan after completed 3.) Review Contract Compliance index and request periodic updates</p>
<p><b>Document #:</b> DR-1.3.b  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> b. Please list and describe the contractor evaluation and quality assurance documents and/or systems used to assess contract compliance, work completion and quality assurance for the Turkey Point and St. Lucie uprate projects</p> <div style="background-color: black; height: 40px; width: 100%;"></div>

<p><b>Document #:</b> DR-1.4.a  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Document Title and Purpose of Review:</b> a. Provide an organizational chart of the organizations and work units responsible for completing the Turkey Point and St. Lucie nuclear uprate projects.</p> <p><b>Summary of Contents:</b> a.) Extended Power Uprate Project Governance and Oversight Protocol- Procedures describe Scope, Project Goals, Principals, Project Governance and Oversight Organization, Project Organization, Risk Management, Key Performance Indicators (KPIs), Project Management and Expectations, and References; an Organizational Chart is shown on (pg.12) for the EPU Project Oversight Organization, which includes the Executive Steering Committee as the top decision-making level; the Chief Nuclear Officer is on the Executive Steering Committee and reports to Jim Robo, the President of FPL Group; An independent Risk Committee reports directly to the Executive Steering Committee for financial issues that arise; the Project Steering Committee, includes the VP Technical Services (Chairman), who reports directly to the Chief Nuclear Officer; Regional Operational VPs, the Integrated Supply Chain VP, Major Vendors, Nuclear Chief Operations Officer, Shaw SWEC Westinghouse TG Vendors, and Interface VPs in Environmental, Legal &amp; Transmission are included within the Steering Committee; A Nuclear Division Technical Challenge Board considers technical issues and alternatives and makes recommendations to the Project Steering Committee, but remains as an independent organizational input to the Steering Committee; The Engineering Director and Project Director report directly the VP Technical Services and are responsible for Engineering &amp; Licensing and Project Execution respectively; The Engineering Director and Project Director have oversight of the Integrated Supply Chain, Juno Environmental Services, Legal, Transmission, Communication and Resource Allocation &amp; Planning to complete the Uprate projects at SL and PTN (See Tab 2) b.) Juno Beach Staffing Ramp Chart shows the Juno staff to support the EPU should increase from about 10 in Q4 in '07 to level off at 34 in Q3 '08 c.) SL Staff Ramp Chart; St. Lucie staffing is slightly below planned levels for Q1 2008; St. Lucie staffing starts at about 2 in Q4 '07 and increases to about 48 by Q3 '08 and hits a max. of about 54 people in Q1 '09; Turkey Pt. Staff should move from a low of about 2 in Q4'07 to about 50 people by Q3'08, and max. at about 53 people by Q1'09 (See Tab 4)</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p>

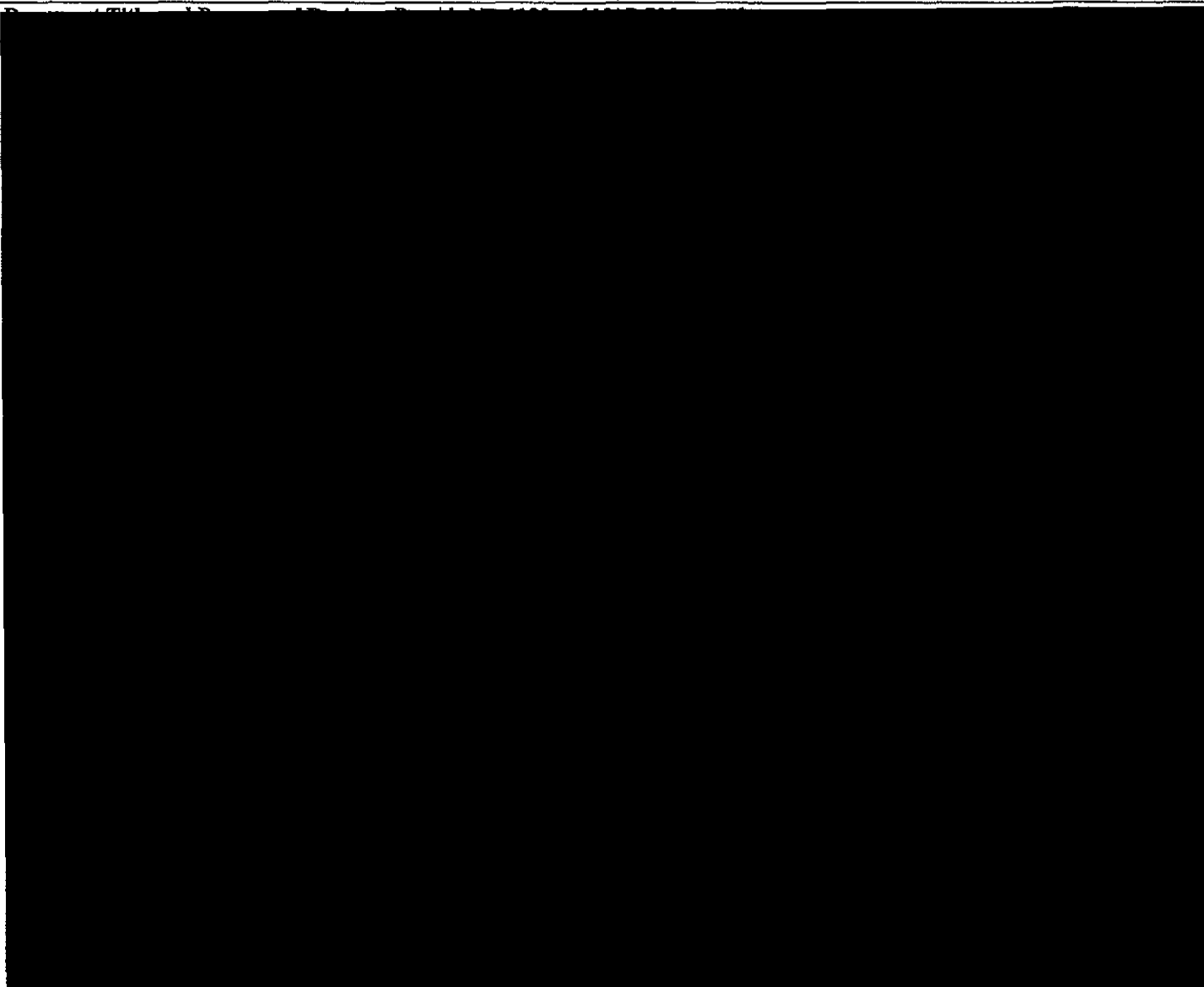
<p><b>Document #:</b> DR-1.7.b  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> b. Please provide copies of all Board of Directors meeting minutes that pertain to the Turkey Point and St. Lucie uprate projects.</p> <p><b>Summary of Contents:</b> a.) Minutes of Meeting of Board of Directors – only the minutes of meetings for 3, 2007 and December 14, 2007</p> <p>[Redacted]</p> <p><b>Conclusions:</b> only two Board meetings mention the uprates in 2007?</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> DR-1.8.a  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> a. Provide a list of all internal or external audits of purchasing or competitive bidding for nuclear unit contracts and components conducted over the period 2005-2007</p> <p>[Redacted]</p> <p><b>Conclusions:</b> Should FPL increase its horizon for audit planning to include major milestone audits of the EPU project and new nuclear units? Need to determine which audits in listing to review.</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> DR-1.8.b  <b>Date Requested:</b> 3/10 for 3/21  <b>Date Received:</b> 3/21/08  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> b. Provide a list of all such audits planned for the period 2008-2010.</p> <p>[Redacted]</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b> 1.) Question audit team regarding 2007 attorney client privileged audit and planned audits for 2008.</p>

**Bureau of Performance Analysis  
Document Summary and Control Log**

**Company:** Florida Power & Light Company  
**Area:** Nuclear Controls Review  
**Auditor(s):** C. Vinson & L. Fisher

**Workload Control #:** PA 08-01-002  
**File Name:** i:\Bureau Performance Analysis\Performance  
Analysis Reports\Nuclear Construction\FPL DR2 Summary and  
Log.doc



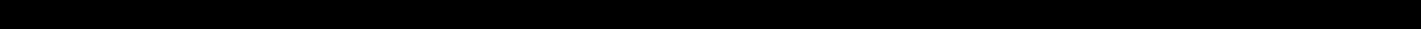
**Document #:** DR-2.1  
**Date Requested:**  
**Date Received:**  
**Comments:** (i.e., Confidential)



**Document #: DR-2.2**  
**Date Requested:**  
**Date Received:**  
**Comments: (i.e., Confidential)**

**Document #: DR-2.3**  
**Date Requested:**  
**Date Received:**

Comments: (i.e., Confidential)

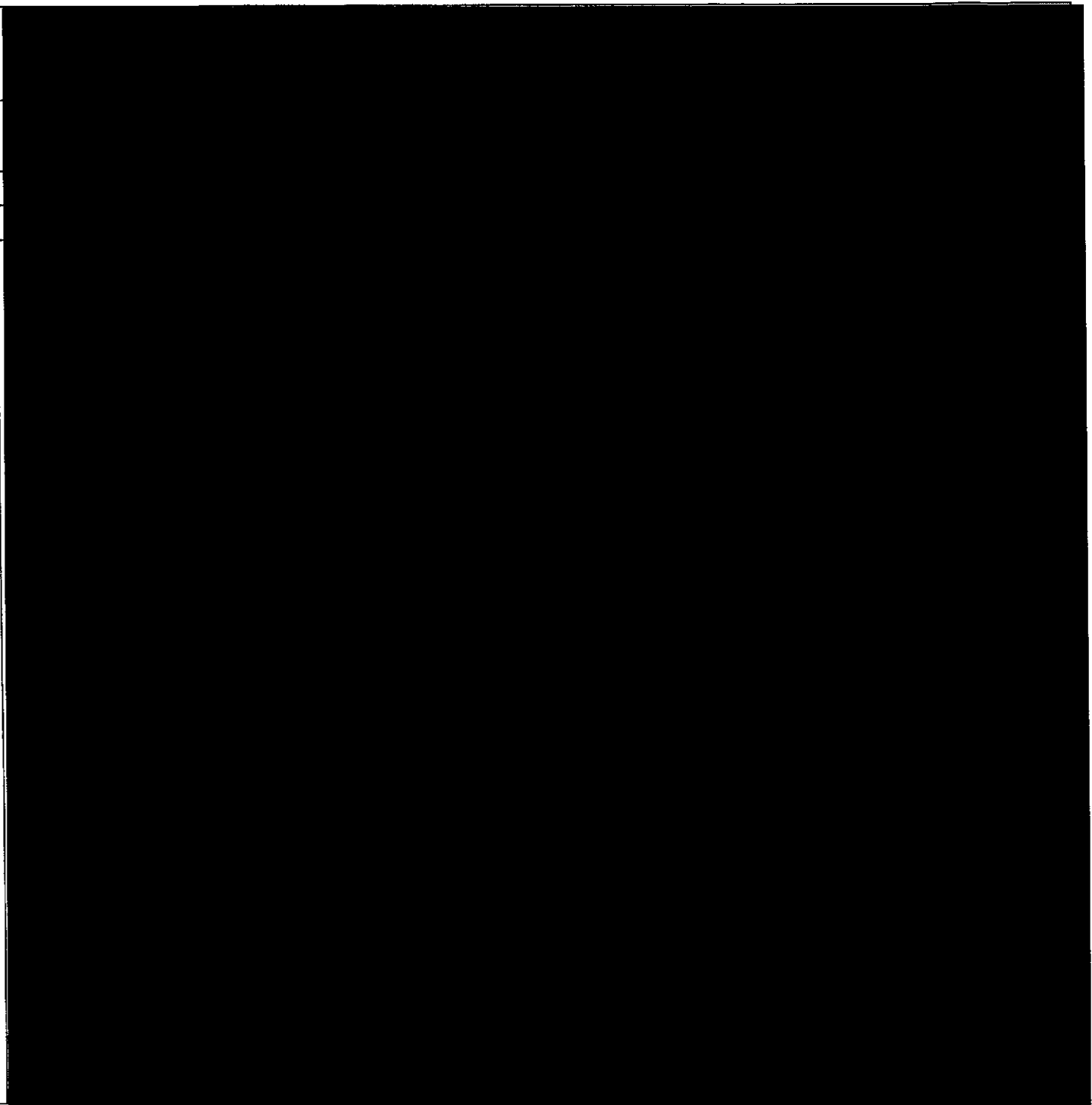
	formatted similar to January 14, 2008 with updated information;
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b> 1.) Ask for status of the 2/1/08 feasibility study and scope and design installation challenge review and results
<b>Document #: DR-2.4</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Provide EPU Project Steering Committee report packages, March 17, 2008 through May 30, 2008 (when available) and associated "take-away task lists"
	<b>Summary of Contents:</b> a.) <b>EPU Project Steering Committee March 17, 2008</b> includes update presentation (33 pgs.) w/Project Overview, Technical Challenges & Strategies, Project Risks & Mitigation (High), Staffing Update, Project Cash Flow, and Highlights of Next Steps discussed; Project KPIs are included (pg.4) showing targets for Safety, Cost, Schedule, Human Resources, Risk Mitigation, Quality and Human Performance, and Regulatory categories; Regulatory status and schedules for certification and siting included on pgs. 8-9; Licensing Amendment Review (LAR) Milestones included 3/1/09 through 9/1/09 on pg. 10; Long Lead Procurement target dates are shown on pg. 11 for 1/31/08 through 5/2/08; Fuels issues requiring decisions are described on pg. 24; Project Management will establish approx. 30 Project Instructions consistent w/ NAP 401 providing guidance  SCA-RAIS for Dade County, SF Regional Planning Council, Office of Coastal and Aquatic Managed Areas, and Siting Office (NRC LAR Status, NPDES Permit Status, Boundary for Certified Site Area, and Crocodile Management) (pgs. 2-5), Key operating Parameter Changes for SL&TP power reactor, steam flow, SG pressure and Final FW temperature (Pg.6); EPU Material Spend Curve Analysis (pg.7), Vendor Strategy Common Scope(Pg. 8), Different Scope (Pgs. 10-11) Margin Management Strategy (Pgs. 12-16), use of Lessons Learned database system, OPEX Reviews and Bench mark visits for strategies to improve scheduling times  Schedules, Vendor Strategy Spreadsheets, Staffing Ramp spreadsheets, Total Project Cost Summary (Level1) for SL&TP, Project Contract Log spreadsheets, Project Risk management spreadsheet w/ Mitigation Plan Status, Potential Scope Changes for TP and SL, Major BOP Long Lead Equipment Milestones and EPU Action Item Report – Project Steering Committee w/ key items for action to complete.
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b> 1) Ask for the T&D evaluation results of new generator capability curves due 4/1/08 2) Determine impacts to schedule and costs due to S&W preliminary validation estimate scope and design changes
<b>Document #: DR-2.5</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Provide turbine generator proposals for EPU presented by Mitsubishi, Toshiba, and Alston
	<b>Summary of Contents:</b> a.) <b>FPL/Westinghouse Uprate Projects Executive Meeting (9/12/07)</b> – looks at FPL expectations, Key Short term Deliverables, Issues/Risks/Mitigating Efforts, Interface Organization, Experience List, Westinghouse NSSS Engineering, Licensing and Fuel Scope, Project Schedules, Westinghouse/Shaw Relationship, Process Efficiencies Recommendations, Contracting Model and Additional Scope and Next Actions; Note in Contracting Model TG upgrades not being bid due to schedule, type and FPL relationship with Siemens; also note on same pg. that Not bidding PB and TP transformers due to schedule and type: 



<b>Document #:</b> DR-2.6 <b>Date Requested:</b>	<b>Conclusions:</b> <b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description: <b>Follow-up Required:</b> 1.) Get pgs. 1-8 of ALSTOM Presentation 1/1/07 2.) does the 11/5/07 letter frm. ALSTOM put them out of the running for the HP and LP retrofits <b>Document Title and Purpose of Review:</b> Provide EPU staffing Plan (through 2009) mentioned by Bill Labbe <b>Summary of Contents:</b> EPU Project Staffing Ramp 2/19/08 was provided as the latest staffing Plan for the EPU

**Date Received:**  
**Comments: (i.e., Confidential)**

**Document #: DR-2.7**  
**Date Requested:**  
**Date Received:**  
**Comments: (i.e., Confidential)**



**Document #: DR-2.8**  
**Date Requested:**  
**Date Received:**  
**Comments: (i.e., Confidential)**

**Document #: DR-2.9**  
**Date Requested:**  
**Date Received:**  
**Comments: (i.e., Confidential)**

<b>Document #:</b> DR-2.10 <b>Date Requested:</b> <b>Date Received:</b> <b>Comments:</b> (i.e., Confidential)	<b>Document Title and Purpose of Review:</b> Provide the Oversight Plan for EPU being developed by Chris Lloyd (when available) <b>Summary of Contents:</b> Will be available in early May 2008 <b>Conclusions:</b> <b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description: <b>Follow-up Required:</b>
<b>Document #:</b> DR-2.11 <b>Date Requested:</b> <b>Date Received:</b> <b>Comments:</b> (i.e., Confidential)	<b>Document Title and Purpose of Review:</b> Provide a description of duties of the Oversight Director and his organization and include any applicable NPs, NAPs, EPPIs. <b>Summary of Contents:</b> Duties and responsibilities of the Oversight Director for the EPU Project will include, but are not limited to, reviewing the project safety record, schedule and expenditures, contracts, contractor performance, resources at the Juno Offices, St. Lucie or Turkey Point sites. The Oversight Director will conduct surveillance and audits of vendors and the project team. The Oversight Director operates independently of the EPU Project and reports findings and makes recommendations directly to the FPL Nuclear Oversight Director and senior FPL management as appropriate, and may be directed by senior management to review, evaluate and report on specific project areas. The Oversight Director presently does not have an organization, but the organization will grow to three individuals, one at each site and one at Juno Beach. There are no NPs, NAPs or EPPIs applicable to the Oversight Director of the EPU Project. The Oversight Director will prepare an EPU Project Oversight Plan to include a schedule for surveillances and audits of the project <b>Conclusions:</b> <b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description: <b>Follow-up Required:</b> 1.) Request copy of EPU Project Oversight Plan when developed
<b>Document #:</b> DR-2.12 <b>Date Requested:</b> <b>Date Received:</b> <b>Comments:</b> (i.e., Confidential)	<b>Document Title and Purpose of Review:</b> Provide copies of responses to the FPSC Financial Audit Document requests 1 through 4 (by Kathy Welch)

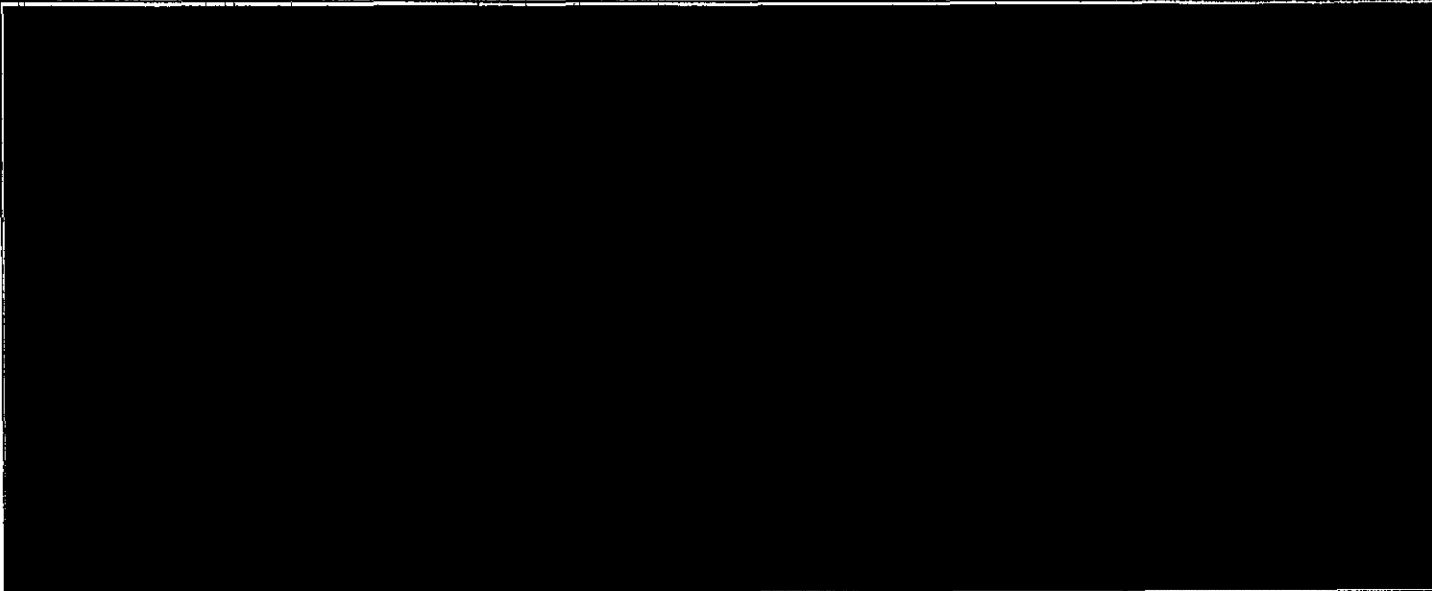
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
<b>Document #:</b> DR-2.13	<b>Document Title and Purpose of Review:</b> Provide the March 17, 2008 EPU Project Steering Committee Meeting Back-up Presentation
<b>Date Requested:</b>	
<b>Date Received:</b>	<b>Summary of Contents:</b> Included in Items 3&4
<b>Comments: (i.e., Confidential)</b>	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>

Division of Competitive Markets and Enforcement  
Bureau of Performance Analysis  
i:\brr\audit forms\3field\document summary and control log.doc

**Bureau of Performance Analysis  
Document Summary and Control Log**

**Company:** Florida Power & Light Company  
**Area:** Nuclear Controls Review  
**Auditor(s):** L. Fisher/C. Vinson

**Workload Control #:** PA-08-01-002  
**File Name:** I:/// FPL DR4 Summary & Log.doc

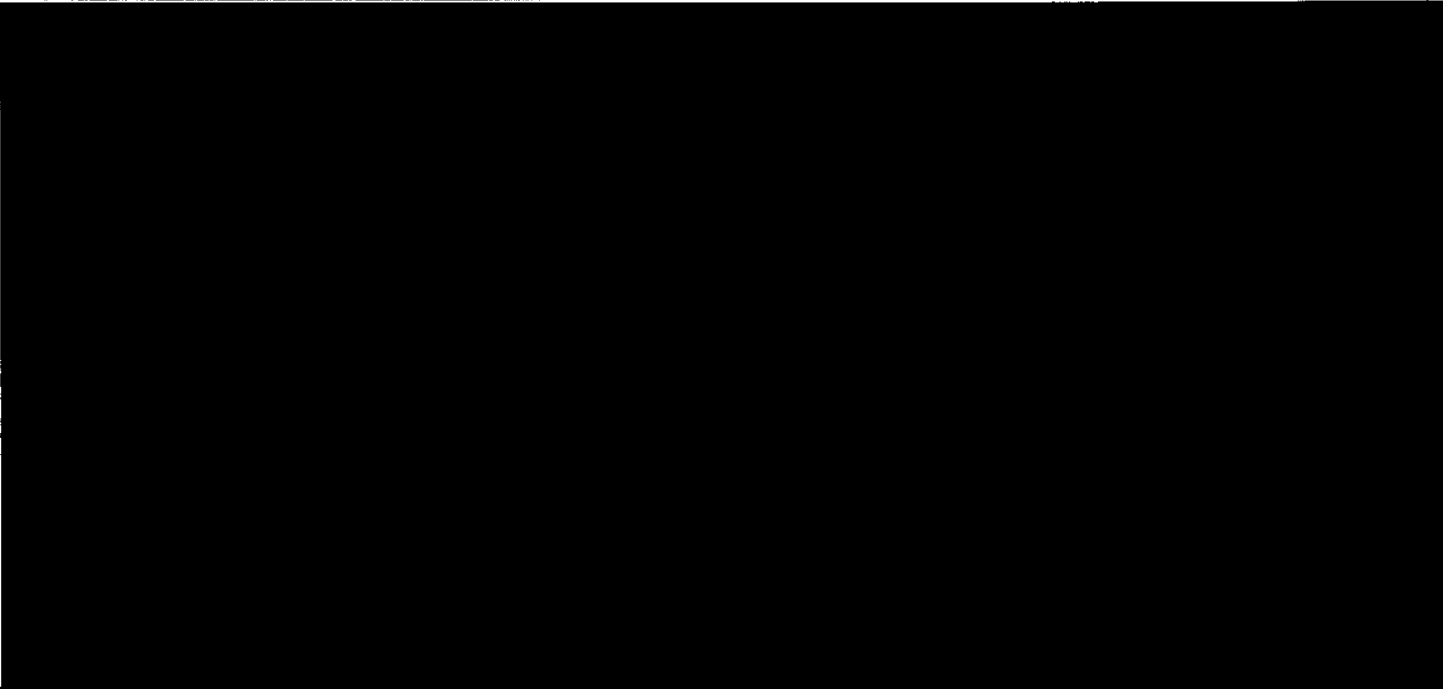
<p><b>Document #:</b> DR-4.1  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> Copy of DR 7 &amp; 8 responses from Kathy Welch re: NuStart</p>  <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> DR-4.2  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> Copy of DR-6.3 from Kathy Welch Request</p> <p><b>Summary of Contents:</b></p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> DR-4.3  <b>Date Requested:</b>  <b>Date Received:</b></p>	<p><b>Document Title and Purpose of Review:</b> Copy of PTN 6 &amp; 7 Organizational chart</p> <p><b>Summary of Contents:</b> organizational chart shows Martin Gettler and Steve Scroggs organizations and responsibilities of key managers; also shows support services to both organizations;</p>

<b>Comments: (i.e., Confidential)</b>	<b>Conclusions:</b> Organization is being completed, but key support functions and personnel are in place
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<b>Document #: DR-4.4a</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Provide major BOP long-lead equipment milestones
	[REDACTED]
	<b>Conclusions:</b> St. Lucie and Turkey Point long-lead items are showing some possible delays in May that require close supervision by FPL
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
<b>Document #: DR-4.4b</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Provide current staffing updates for Juno Beach, Turkey Point and St. Lucie uprate staffing summaries
	<b>Summary of Contents:</b> Actual staffing level for Juno is slightly lower than Planned for March through May 5/2/2008; St. Lucie staffing is lower then planned in April through May 4, 2008; Turkey Point is off by approx. 10-15 people although some additional staff were selected in April and May
	<b>Conclusions:</b> FPL staffing ramp-up is behind schedule and may cause delays if it continues to go unresolved
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<b>Document #: DR-4.4c</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Provide EPPI 110, 140, 300, 440, and 410
	<b>Summary of Contents:</b> EPPI-300 – Project Scope Change Control Process, Scope changes above \$25,000 require approval of VP Nuclear Technical Services and the CNO; EPPI-110 Project Expectations and Conduct of Business- includes EPU functional org. chart; EPPI-140- Roles and Responsibilities for the EPU project management effort; EPPI 440- EPU Field Activity Monitoring Plans- Field Activities Monitoring Plan is the formal plan to monitor activities and drives the full completion of monitoring activities; Project Manager is responsible for developing the FAMP and Site Project Manager is responsible for the approval of FAMPs; includes organization and training, work packages and preparations, field implementation and post job performance; pg. 6 of 22 designates system/equipment risk analysis and industrial safety risk assessment; pg. 7 of 22 shows the Risk Analysis Results for items identified as high, medium and low equipment risks and industrial safety risks of low and medium levels; pgs.21-22 of 22 show a completed form that includes wo, schedule id, description of task, risk, risk mitigation, and observation responsibility; EPPI 410- Project Plans and Task Plans provides Project Plan Hierarchy and responsibility for development; Governance and Oversight and Fleet Project Plan is the responsibility of the Project Director, the Ste project Plan is the responsibility of the Site Project Manager, the Conceptual Design is the responsibility of the Project Engineer, and the Site Task Plan is the responsibility of the Project Manager.
	<b>Conclusions:</b>

## Bureau of Performance Analysis Document Summary and Control Log

<b>Company:</b> <u>Florida Power &amp; Light Company</u> <b>Area:</b> <u>Nuclear Control Review</u> <b>Auditor(s):</b> <u>L. Fisher/C. Vinson</u>	<b>Workload Control #:</b> <u>PA-08-01-002</u> <b>File Name:</b> <u>I:\Bureau Performance Analysis\Performance Analysis Reports\Nuclear Construction\FPL Uprate\Documents\DR-5 Log.doc</u>
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<b>Document #:</b> DR-5.1 <b>Date Requested:</b> 5/27/08 <b>Date Received:</b> 5/28/08 <b>Comments:</b> (i.e., Confidential)	<p><b>Document Title and Purpose of Review:</b> For the years 2006, 2007, and 2008 to date, please provide a list of components with a cost of \$200,000 or more that were replaced at Turkey Point units 3 and 4 and that are scheduled to be replaced <u>again</u> during completion of the EPU project work. For each component listed, indicate the <u>anticipated approximate date of replacement</u>.</p> <p><b>Summary of Contents:</b> The following items were identified as components with cost greater than \$200,000 which were replaced during 2006, 2007, and 2008 to date, and will be replaced during execution of the EPU project at Turkey Point based on the current scope documents. A number of other items installed during this time frame will be modified but not replaced. The list for replacement includes: the 4A Condensate Pump/Motor to be replaced in 20011, expansion joint replacements (2006 &amp; 2007) to be replaced in 2010 and 2011, Unit 3 Generator Rotor (2007) to be replaced in 2010.</p> <p><b>Conclusions:</b> FPL has to replace some equipment installed within the last few years to meet requirements of the new uprate pressures.</p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
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<b>Document #:</b> DR-5.2 <b>Date Requested:</b> 5/27/08 <b>Date Received:</b> <b>Comments:</b> (i.e., Confidential)	
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**Document #: DR-5.3**  
**Date Requested: 5/27/08**  
**Date Received: a,d,e 5/28/08**  
**Comments: (i.e., Confidential)**

**Document #: DR-5.4**

<p>Date Requested: 5/27/08  Date Received:  Comments: (i.e., Confidential)</p>	
	<p><b>Summary of Contents:</b></p>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p>
	<p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-5.5</b>  <b>Date Requested: 5/27/08</b>  <b>Date Received: 5/28/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> a.) Please provide a copy of the switchyard study for the Turkey Point uprate and any similar study completed for the St. Lucie uprate, if not already provided in a previous request. (George Pittman) b.) Please provide a copy of the cooling capacity study for the Turkey Point uprate and any similar study completed for the St. Lucie uprate, if not already provided in a previous request.</p>
	<p><b>Summary of Contents:</b> a.) Turkey Point- A feasibility study was completed to determine the cost of grid studies necessary as a result of the power uprate. Attachment A is the single page describing the required grid study and estimated cost for the same. Note that the grid study is a complex series of detailed analyses that is expected to be completed by early 2009. That study will determine impact on the switchyard and connected grid and will define the set of modifications needed to accommodate the uprated capability of the Turkey point nuclear units. Attachment B is the FPL/Shaw Scoping Study description of the Switchyard and the modifications and additional analyses determined to be required b.) The cooling capacity study for the Turkey and St. Lucie uprate projects are not complete, but will be provided when completed</p>
	<p><b>Conclusions:</b> FPL is in the process of completing grid study (in 2009) and the cooling studies for TP and SL uprates (2008) to determine the impact on the uprate project schedule and costs.</p>
	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p>
	<p><b>Follow-up Required:</b> Get cooling capacity study for the Turkey and St. Lucie uprate projects when completed</p>
<p><b>Document #: DR-5.6</b>  <b>Date Requested: 5/27/08</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> a.) Please describe any uprate management compensation incentives for completing the uprates under budget and on schedule. b.) Please identify each management position, the applicable incentives, and the methodology for calculating the incentives. c.) Are there any other performance incentives provided for non-management employees for completing the uprates under budget and on schedule? d.) Please describe any incentive mechanisms previously used by the company for any prior plant construction projects?</p>
	<p><b>Summary of Contents:</b> a.) The EPU project is a component of what is measured to determine the corporation management compensation incentives. Personal performance is another component that is used to determine management compensation incentives. Budget and schedule compliance are typically used as a measurement of the performance of managers. At this time no uprate exclusive management compensation incentives are tied to completing the uprate under budget and on schedule. b.) At this time there are no incentives specifically for the uprates being completed under budget and on schedule. c.) At this time there are no incentives provided to non-management employees that are explicitly tied to completing the uprates under budget and on schedule. d.) There have been incentive mechanisms created for two prior Plant construction projects (PTN Fossil unit 5 and the West County Generation Project) described as follows: An incentive pool was funded on a sliding scale based on savings under targeted cost. The amounts were paid to participating employees over the first two years of the Plant Operation (after construction and only if savings were realized) based on achievement of plant Equivalent Forced Outage Rate (EFOR) and Heatrate indicators.</p>
	<p><b>Conclusions:</b> Currently there are no individual incentives for management or non-management employees for the completion of the</p>

	<p>Commercial show the same schedule information for construction of the two new units, but shows that the Engineering &amp; Procurement Contract/ Design and Procurement Activities are complete by 2012 and the Construction Contract/Planning and Site Prep are complete by 2012; g.) Types of Contracts Expected shows that for <u>Application Development</u>, consultant work, vendor support, and conceptual engineering contracts will be necessary to support and portions of the application; <u>Engineering and Procurement</u> shows that engineering and scheduling, vendor project management, design adaptation to specific FPL Site and infrastructure, and long lead time procurement contracts will be necessary; <u>Construction</u> shows that early site preparation (roads and bridges), non-nuclear construction (warehouses, admin bldgs) and power plant and other facility construction contracts will be necessary; Potential Associated Facilities shows that Transmission, Training Simulator, Fill Excavation, Water Supply, and Construction Support are other peripheral facilities that FPL is looking into and will need to be considered and possibly built;</p> <p><b>Conclusions:</b> FPL has established a <u>New Nuclear Projects and Development</u> reporting structure to the CEO shows that S. Scroggs reports to E. Silagy VP Development and he reports to Ormando Olivera FPL President; M. Gettler reports directly to B. McGrath Sr.VP Construction; Both Olivara and McGrath, report to Jim Robo Chief Operating Officer at FPL Group, Inc, who reports to Lew Hay CEO FPL Group;</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-5.9</b>  <b>Date Requested: 5/27/08</b>  <b>Date Received: 5/29/08</b>  <b>Comments: (i.e., Confidential)</b></p> <p>CONFIDENTIAL</p>	<p><b>Document Title and Purpose of Review:</b> Provide a copy of all completed 2008 monthly dashboard reports to management for units 6&amp;7.</p> <div style="background-color: black; height: 200px; width: 100%;"></div> <p><b>Conclusions:</b> The New Nuclear Development organization uses the dashboard view to provide monthly summaries of the project risk assessment and project indicator status compared to the previous month results</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-5.10</b>  <b>Date Requested: 5/27/08</b>  <b>Date Received: 5/28/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> a.) Please provide a listing of all NUPIC assisted audits performed on Turkey Point Units 3&amp;4 and St. Lucie Units 1&amp;2 during the last two years. b.) Please provide a listing of completed QA audits for 2007 and 2008, and the remaining planned QA audits for 2008. c.) Please provide the QA Oversight Plan for the uprates when it becomes available.</p> <p><b>Summary of Contents:</b> a.) FPL understands the request statement to mean that a listing of all NUPIC sponsored supplier audits utilized to qualify or maintain the qualification of a supplier providing safety related items and services to the Turkey Point Units</p>

3&4 and St. Lucie 1&2 during the last two years is to be provided. Attached to this response is a listing of all NUPIC sponsored audits utilized by FPL to qualify or maintain the qualification of suppliers providing safety-related items or services to the Turkey point Units 3&4 and St. Lucie Units 1&2 during the last two years; this listing includes all NUPIC sponsored audits in which FPL provided staff resources for the performance of the audit or accepted the audit based on review of NUPIC supplied information b.) FPL understands the request statement to mean that a listing of completed QA supplier audits for the qualification and re-qualification of suppliers for the Turkey Point Units 3&4 and St. Lucie Units 1&2 in 2007 and 2008 and the remaining planned QA audits for the qualification of suppliers in 2008; this listing identifies supplier audits in which FPL will either perform the audit for its own purposes as it does not meet the threshold for NUPIC sponsorship or will provide staff resources to NUPIC in support of the audit process; c.) FPL will provide QA Oversight Plan for uprates when it becomes available

**Conclusions:** FPL conducts QA vendor audits of its own and joins NUPIC in sponsored audits of other vendors; QA also conducts on-site evaluations of contractors for safety-related work;

**Data Request(s) Generated:**

No. \_\_\_\_\_ Description:

No. \_\_\_\_\_ Description:

**Follow-up Required:**

**Document #: DR-5.11**  
**Date Requested: 5/27/08**  
**Date Received: 5/22/08**  
**Comments: (i.e., Confidential)**

CONFIDENTIAL



**Document #: DR-5.12**  
**Date Requested: 5/27/08**  
**Date Received:**  
**Comments: (i.e., Confidential)**

CONFIDENTIAL

**Document #: DR-5.13**  
**Date Requested: 5/27/08**  
**Date Received: 5/22/08**  
**Comments: (i.e., Confidential)**

CONFIDENTIAL

<p><b>Document #: DR-5.14</b>  <b>Date Requested: 5/27/08</b>  <b>Date Received: c&amp;d 5/22/08</b>  <b>a, b 5/28/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p> <p><b>Document Title and Purpose of Review:</b> a.) Please provide the most current listing of all unfilled staff positions for the uprates and an estimated date for filling each position. b.) Please provide a listing of all unfilled operating and non-operating plant positions, by plant, for the uprates and an estimated date for filling each position. c.) Please provide the most current listing of all unfilled staff positions for Units 6&amp;7 and an estimated date for filling each position. d.) Please provide a listing of all unfilled operating and non-operating plant positions for Units 6&amp;7 and an estimated date for filling each position.</p> <p><b>Summary of Contents:</b> a.) The vacant positions that were to be filled in the first quarter of 2008 are the first positions being filled. Most of the vacant positions that remain from the first quarter of 2008 are positions that commitment offers have been made or accepted but the individuals have not reported to the project. b.) Please see DR-5.14a response c.) There are currently 8 unfilled staff positions for New Nuclear Project units 6&amp;7. Four engineering positions plus one engineering manager; hiring is in process for these positions and they should be filled in the 2Q and 3Q of 2008; two positions , a license engineer and QA/AC engineer are being filled on a part-time basis as-needed by contract personnel; the 1st position is a budget analyst to be filled in June. d.) Operating and Non-Operating plant positions have not been uniquely identified nor scheduled; the project will develop these requirements over the next two years or as-needed</p> <p><b>Conclusions:</b> Some of the remaining positions to be filled are being filled in the next few months, while others will be part-time positions to be filled soon; Some operations positions have not been uniquely identified, but will need to be filled once the project matures over the next few years;</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-5.15</b>  <b>Date Requested: 5/27/08</b>  <b>Date Received: 5/28/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> a.) Please describe what changes FPL made to take advantage of the opportunities to reduce costs at Turkey Point, as given in Shaw's Turkey Point Scoping Study and recommendations. (DR-3.18) b.) Explain what cost reductions were realized based on the Shaw recommended "opportunities to reduce costs" at Turkey Point? (DR-3.18)</p> <p><b>Summary of Contents:</b> a.) The Shaw Turkey Point Scoping Study was recently released and is being reviewed and evaluated by EPU project personnel with respect to scope and cost estimates; Following the review and evaluation, as appropriate</p>

<p>Date Received: 5/22/08  Comments: (i.e., Confidential)   CONFIDENTIAL</p>	<p><b>Summary of Contents:</b> The company response to Kathy Welch DR-6.2 stated: The project is not aware of an Areva transformer study. There was a preliminary transformer evaluation done by FPL project. A copy of that evaluation is enclosed. The report title is <i>St. Lucie Units 1 and 2, Engineering Evaluation for EPU Project Action Plan for Main Transformers, PSL-ENG-SEEJ-08-015</i></p>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p>
	<p><b>Follow-up Required:</b></p>

Division of Competitive Markets and Enforcement  
Bureau of Performance Analysis  
i:\brr\audit forms\3field\document summary and control log.doc

## Bureau of Performance Analysis Document Summary and Control Log

<b>Company:</b> <u>Florida Power &amp; Light Company</u> <b>Area:</b> <u>Nuclear Controls Review</u> <b>Auditor(s):</b> <u>L. Fisher/C. Vinson</u>	<b>Workload Control #:</b> <u>PA 08-01-002</u> <b>File Name:</b> <u>i:\Bureau Performance Analysis\Performance Analysis Reports\Nuclear Construction\FPL DR6 Summary and Log.doc</u>
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<b>Document #:</b> DR-6.1 <b>Date Requested:</b> 6/9/08 <b>Date Received:</b> 6/13/08 <b>Comments:</b> (i.e., Confidential)	<p><b>Document Title and Purpose of Review:</b> a. Please clarify whether the ABWR reactor technology (already having NRC design certification) was one of the five considered by FPL in its engineering study of reactor technology, discussed in Steven D. Scroggs testimony in Docket 0800009-EI, (page 5). b. Please explain why the ABWR technology (already having NRC design certification) was not a more favorable choice than the GE ESBWR technology (without NRC design certification) and rated as one of the top two choices for FPL. c. MPR Associates, Inc. review of the Nuclear Technology Selection Process (pg. 1 of 58) shows that the ABWR and AP1000 technologies have NRC approved Design Certifications and appear to have the least regulatory risk to developing a COLA by 2009. Please explain why FPL chose not to select the ABWR over the AP1000.</p> <p><b>Summary of Contents:</b> a.) Yes the ABWR was considered in the technical assessment detailed in Exhibit SDS-4 b.)The technology selection process involved technical, commercial and project execution perspectives. The technical portion of the assessment included review of technologies by systems, engineering features, identification of risks, including first-of-a-kind design issues and licensing risks, and the pros and cons of each technology; assessment included five technologies were considered technically acceptable; assessment of the top three technologies provided basis of final recommendation of AP1000 and ESBWR; specific attributes that favored the ESBWR over ABWR are discussed in Section 7 and summarized in Section 8 (utility selection of choice, nuclear safety, and NuStart Technology); Both ESBWR and ABWR had strengths and weaknesses in the commercial and project execution areas, but were about on par; ESBWR design, supported by NuStart Consortium, had some advantages due to the sponsorship and FPL had access to the benefits of NuStart membership; c.) The fact that ABWR has achieved design certification does reduce some risk areas relative to the ESBWR, but not in comparison to the AP1000; Section 8 of the technical assessment summarizes several areas that favored the AP1000 (utility selection of choice, number of fuel assemblies, nuclear safety, grid capacity, and NuStart Technology); as discussed in witness Scroggs testimony, pg. 5, line 16 to pg. 7, line 3) the AP1000 offered a superior combination of commercial and project execution risk factors in comparison to the other designs, including the ABWR.</p> <p><b>Conclusions:</b> FPL did consider the ABWR reactor technology and decided that although the ABWR had already received NRC approval it did not provided the commercial benefits of the AP1000; FPL's decision also is supported by the fact that it has additional benefits through the NuStart Consortium membership (price and training are just two)</p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
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<b>Document #:</b> DR-6.2 <b>Date Requested:</b> 6/9/08 <b>Date Received:</b> 6/18/08 <b>Comments:</b>  CONFIDENTIAL	[Redacted Content]
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**Document #: DR-6.3**  
**Date Requested: 6/9/08**  
**Date Received: 6/13/08**  
**Comments:**

6.3c and 6.3d are considered  
**CONFIDENTIAL**

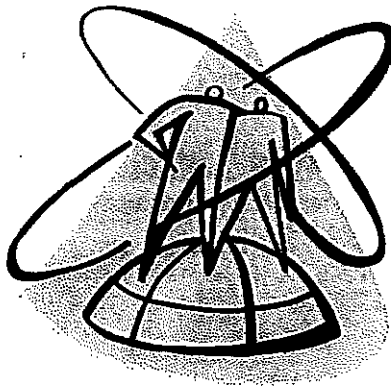
## Bureau of Performance Analysis Document Summary and Control Log

Company: Florida Power & Light Company  
 Area: Nuclear Controls Review  
 Auditor(s): Vinson/Fisher

Workload Control #: PA-08-01-002  
 File Name: I:\BPA\PAR\Nuclear Construction\FPL  
 uprate\documents\FPL DR7 Summary &  
 Log.doc

<p>Document #: 7.1          Date Requested:          Date Received:          Comments: (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> Provide the following Procedures; a. NAP 706, Project Review Board b. NAP 703, Long Range Plan c. NAP 500, Business Planning and Budgeting d. NAP 423, Active Design Modifications</p> <p><b>Summary of Contents:</b> a.) NAP 706 Project Review Board provides information on the Board, its duties and responsibilities. b.) NAP 703 Long Range Plan describes the steps of preparing long range plans for major outages and non-outage projects and modifications approved by the Project Review Board (PRB) and Site vice president; it shall also provide annual budget targets for minor modifications, as a line item. c.) NAP 500 Business Planning and budgeting explains the procedures and responsibilities for completing business project plans and their associated budgets, including the common framework, central governance, milestones, and roles and responsibilities. d.) NAP 423 Active Design modifications explains the use of designing and implementing modifications to nuclear division plants; provides guidance in the process for specifying the approved projects for major or minor plant design changes and modifications.</p> <p><b>Conclusions:</b> FPL has nuclear application procedures to guide long range planning, business plan budgeting, and plant design modifications for nuclear plants that it follows in project development and implementation.</p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p>Document #: 7.2          Date Requested:          Date Received:          Comments:            CONFIDENTIAL</p>	<p><b>Document Title and Purpose of Review:</b> a.) Please provide the initial FPL cost estimates to complete the uprates for St. Lucie Units 1&amp;2 and Turkey Point units 3&amp;4. b.) Please provide FPL's subsequent cost estimate changes to complete the uprates for St. Lucie Units 1&amp;2 and Turkey Point units 3&amp;4, with an explanation of the cost changes. c.) Please provide FPL's current budget estimate to complete the uprates for St. Lucie Units 1&amp;2 and Turkey Point units 3&amp;4.</p> <div style="background-color: black; height: 100px; width: 100%;"></div> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p>Document #: DR-7.3          Date Requested:          Date Received:</p>	<p><b>Document Title and Purpose of Review:</b> Please provide a summary chart of the nuclear uprates completed by FPL, FPL Group, and FPPE, including the plant and units uprated, type of uprate completed, uprate outage duration by year, project completion date, total uprate MW improvement, and final cost of the uprate project.</p>

# FLORIDA POWER & LIGHT COMPANY



## NUCLEAR CONTROL REVIEW

Staff Workpapers for  
**TURKEY POINT AND ST. LUCIE UPDATES**  
And New Units 6 & 7

Workplan, DR-3 Document Log, and staff prepared  
analysis from documents

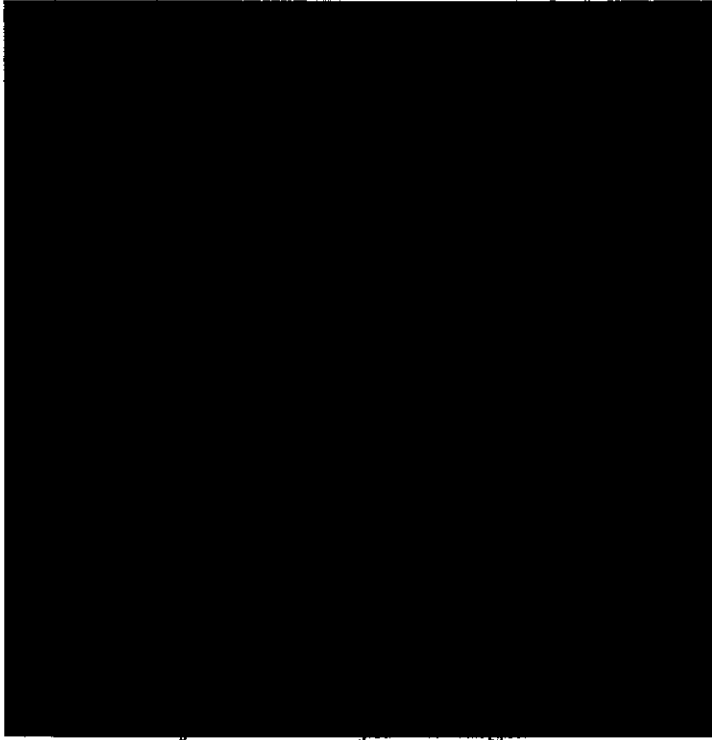
**Bureau of Performance Analysis Work Plan  
 Florida Power & Light Company  
 Nuclear Uprate and New Construction  
 Project Controls Review**

**Uprate Project**

Section	Task	Subtask	Audit Notes	Observation
<b>2.1 Project Planning</b>				
	How did the company identify the scope of work?	Internal Feasibility Studies	Second quarter of 2007, FPL began internal feasibility studies to determine the potential for a nuclear power uprate of St. Lucie Units 1 & 2 and Turkey Point Units 3 & 4. Studies examined capability of existing systems and feasibility of EPU, economic break points, plant modifications needed, and estimated costs for the four unit uprate.	FPL's scope evaluation process appears to be appropriate; provided technical and managerial evaluation of risks, costs, benefits, and feasibility of uprate projects.
		External Review	September 2007, FPL used Shaw Stone & Webster (SS&W) to review proposed Turkey Point and St. Lucie EPU studies completed by FPL.	
		Other Analysis	FPL reviewed long lead-time equipment, materials, commodities, labor, licensing amendments, environmental impacts, and need for additional transmission facilities for the uprates. Also reviewed several iterations of a Nuclear Uprate Economic Analysis to consider differing fuel and emissions scenarios for uprates.	
29	What regulatory approvals are required for completion of the project?	Federal License Approvals		FPL seems to have reasonably proceeded with required regulatory approval,

				scheduling, and preparation of applications to meet the planned project completion dates.
		State Need Determination	FPL filed its petition with the Florida Public Service Commission on September 17, 2007, and received approval of the uprate request on January 7, 2008	
		State Site Certification	Florida Department of Environmental Protection approval of a Site Certification Application is required for plant uprates of 75 MW or more; FPL submitted site certification for St. Lucie 1&2 in December 2007	
	Has the company developed a project plan to meet the desired project completion dates?	Scheduled uprate completion dates	FPL scheduled the St. Lucie and Turkey Point uprates to be done during scheduled fuel outages in 2011 and 2012;	FPL's planning approach to date seems appropriate. Refined phase two and three project budget and schedule will be critical to future project planning.
		Tracking of schedule status and costs	weekly project schedule updates are reflected in executive management reports and update meetings;	
		Procurement and tracking of long-lead equipment	FPL entered into negotiations with long-lead vendors at an early point in the project, and secured a place in the suppliers' queues for delivery of turbine-generator equipment and services to meet project dates; ISC also works with EPU Project Management, nuclear engineering, and other SMEs to ensure equipment is ordered in time to meet the project work schedule.	
		Planning of equipment modifications		
	Was the company's risk evaluation for the uprate project reasonable?	Risk identification and mitigation	FPL risk assessment is continued from the initial project evaluation through the project implementation, based on nuclear division procedures; the Risk Committee assists senior management in considering risk mitigation and financial decisions for the project as needed; it reviews and evaluates initial cost projections and any significant variances from the	To date, FPL seems to have taken steps to identify, evaluate, and mitigate project risks.

	selected uprate contractors and vendors?		projects were selected both through the competitive bid process and through the use of sole sourcing;	use of sole source
		Company procurement policies and procedures		selections for the uprate project is in keeping with its procedures and reasonable business practices.
		Contracts greater than \$1 million summary	the largest contract in dollar amount is with Westinghouse Electric Company(sole source fixed-price contract), for engineering support of the nuclear fuel parameters, fuel burn uprates, primary system pressure and temperature operating parameters; second largest contract is with Shaw Stone & Webster (single source supplier), for engineering support associated with steam and feed water systems and the turbine generator electrical capacity; there are two contracts with Siemens Corporation (sole-source vendor), one reserves manufacturing forging slots for St. Lucie Units 1 and 2 Low Pressure Turbine rotors, and the other is for the Turkey Point Unit 3 Generator rotor.	
	Has the company established	EPU Project Management	FPL procedures provide for basic contractor oversight	To date FPL's

	reasonable project controls for contractor management and evaluation?	oversight of contractors	by the EPU Site Project Manager, the site Technical Representative, and Contract Coordinators who administer site services; these functions coordinate contractor reviews of performance while contractors are on the plant site working; the EPU Site Project Manager will provide oversight of the contractor progress and project work performance while the contractor is on site	approach to contractor oversight and evaluation appears to be appropriate; Proactive project
		Support services evaluation of contractor performance	<p>FPL's Nuclear Sourcing and Integrated Supply Chain completes weekly updates to the Project Contract Log and reports updated contract status to FPL executives and Project Management; Nuclear Sourcing also completes annual vendor scorecards on a selected group of FPL's largest vendors for the year across all areas of FPL operations; the process is intended to be used by FPL to identify vendor performance strengths and weaknesses, and to be useful in discussions with vendor management when improvement is needed;</p> 	management by FPL should require frequent communication and updates, demand contractor accountability, and challenge information provided by contractors.

	Has the company established appropriate controls to prevent contractor cost overruns and poor performance?	Vendor listing and evaluations after major work projects		FPL has made efforts to ensure effective contractor performance by means of contract provisions and structure. This approach appears to appropriately seek control of contract costs through the use of contracts structured to encourage contractor performance.
		Structuring contracts to reduce cost increases		
		Performance incentives for meeting or exceeding contract provisions		
		Use of Fixed Price, Target Price and Time & Materials to manage contractor overruns.		

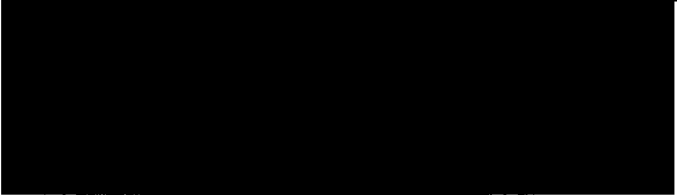


**2.5 Auditing and Quality Assurance**

Has the company established appropriate auditing and quality assurance controls for the uprate project?	Internal Audit Plan	FPL's IA Group completes scheduled and management requested audits of all company operations; the Annual Audit Plan is based on operational and financial risks associated with the annual corporate business plan; to date, there have been no internal audits of the St. Lucie and Turkey Point uprates completed; the first internal audit of the uprate project in mid-2008; IA will examine expenses for the uprates to assure costs are correctly charged to each project;	FPL's audit effort for Turkey Point Units 6 & 7 is in the very early stages, but the structure and plans for the audit function appear adequate. As the project progresses, more frequent internal audits and quality assurance audits will be necessary to ensure successful completion of Turkey Point Units 6 & 7
	FPL Quality Assurance contractor evaluations	In addition to FPL's internal auditing effort, FPL's Quality Assurance (QA) function performs safety-related vendor audits and QA contractor performance evaluation reports; FPL's QA organization is responsible for performing audits or surveillances on safety-related and quality-related services where they are performed under the contractor's QA Program.	

**New Nuclear Construction Project**

Section	Task	Subtask	Audit Notes	Observation
<b>3.1 Project Planning</b>				
	Were the company site	Project Team developed to	during the summer of 2006, a core project team was	The FPL site

			support the construction of the new units at Turkey Point;	
	Was the company technical design selection reasonable?	Technology assessment	FPL began its process of identifying the project technology by completing an engineering analysis of nuclear reactor designs available in the industry. FPL originally studied five primary reactor technology options; FPL chose the Westinghouse AP1000 technology as its preferred reactor technology design largely because it has received certification by the NRC, employs a proven pressurized water reactor design, and includes an advanced passive design safety system;	FPL's plant design selection process was reasonable and effective in positioning the company to meet the anticipated need for capacity in 2018
		External review of assessment	To verify the reasonableness of its approach to the technology decision, FPL engaged MPR Associates, Incorporated to check its technology selection logic;	
	Was the company approach to negotiating and selecting the EPC provider reasonable?	Purchase and ordering of technology	FPL believes the company will benefit from the early wave of AP1000 construction projects; management views this position as advantageous, since first-of-a-kind production can involve considerably more risks; these factors may also allow the company time to negotiate cost savings in its engineering procurement and construction contract for Turkey Point Units 6 & 7; The company states that it has historically used this approach to vendor contracting, and notes that it is a conservative means to stimulate competition for project services.	FPL's strategy to pursue separate contracts for project procurement, engineering and construction may reduce total project costs. FPL should continue to evaluate the impact of the timing of contractor selection on the overall project schedule.
		Construction of the plant	Some utilities may be seeking the full range of engineering, procurement, and construction services, through an Engineer Procure and Construct contract;  Limited Work Authorization that would allow it to perform limited construction on the Turkey Point site for Units 6 & 7. When approved, the LWA is	

## Bureau of Performance Analysis Document Summary and Control Log

Company: Florida Power & Light Company  
 Area: Nuclear Controls Review  
 Auditor(s): C. Vinson & L. Fisher

Workload Control #: PA 08-01-002  
 File Name: I:\Bureau Performance Analysis/Analysis Reports/Nuclear/Construction/FPL Uprate/FPL DR-3.doc

### Turkey Point Units 6&7 (Questions 1-15)

<p>Document #: DR-3.1a          Date Requested: 4/21/08          Date Received: 4/22/08          Comments: (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> Please provide current copies of all project planning documents for Turkey Point Units 6 and 7.</p> <div style="background-color: black; height: 150px; width: 100%;"></div> <p><b>Conclusions:</b> FPL began planning for the COLA portion of the project in 2006 and outlined basic strategy for completing the COLA, site selection and technology selection;</p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>														
<p>Document #: DR-3.1b          Date Requested: 4/21/08          Date Received: 4/22/08          Comments: (i.e., Confidential)</p>	<p><b>Document Title and Purpose of Review:</b> Please list and describe the planning and design documents and/or systems used to support, develop and maintain the project plan for the Turkey Point Units 6 and 7.</p> <p><b>Summary of Contents:</b> Also included in the response was Bechtel's project Execution plan for the Turkey Point COLA project initially issued April 16, 2008; the project plan number 25409-000-G01-GAM-0001; work to be completed in two phases, COLA Preparation (Phase 1) and NRC Review Support (Phase 2); Phase 1 broken into 14 tasks of (1) Gen. Admin Info (2) Final Safety Analysis (3) Environmental Report (4) Technical Specifications, (5) Emergency Plan, (6) LWA/ Site redress Plan, (7) Generic DCD Departures, (8) Security plan, (9) Other Withheld Info, (10) License Conditions, (11) Project Management and Administration, (12) Information gathering, (13) Cooling Water Study, and (14) New Meteorological Tower Installation; Key milestones for the FPL Turkey Point COL project are:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Commence Work</td> <td style="text-align: right;">11/20/07</td> </tr> <tr> <td>Issue Targeted Schedule</td> <td style="text-align: right;">1/17/08</td> </tr> <tr> <td>Issue Cooling Water Study</td> <td style="text-align: right;">4/17/08</td> </tr> <tr> <td>Complete SSI Drilling Activities</td> <td style="text-align: right;">4/25/08</td> </tr> <tr> <td>Meteorological Tower Operable</td> <td style="text-align: right;">5/29/08</td> </tr> <tr> <td>Submit COLA to NRC</td> <td style="text-align: right;">3/31/09</td> </tr> <tr> <td>NRC Issue COL- forecast</td> <td style="text-align: right;">9/30/12</td> </tr> </table> <p>The Bechtel contract is a T&amp;M reimbursable contract with performance incentives w/ target price of \$18,531,559, but may be adjusted to reflect scope changes; also provides Bechtel QAPP Quality Assurance Plan;</p>	Commence Work	11/20/07	Issue Targeted Schedule	1/17/08	Issue Cooling Water Study	4/17/08	Complete SSI Drilling Activities	4/25/08	Meteorological Tower Operable	5/29/08	Submit COLA to NRC	3/31/09	NRC Issue COL- forecast	9/30/12
Commence Work	11/20/07														
Issue Targeted Schedule	1/17/08														
Issue Cooling Water Study	4/17/08														
Complete SSI Drilling Activities	4/25/08														
Meteorological Tower Operable	5/29/08														
Submit COLA to NRC	3/31/09														
NRC Issue COL- forecast	9/30/12														

	<p><b>Conclusions:</b> FPL selected Bechtel to complete the COLA under T&amp;M w/target price contract and incentives; Bechtel completed basic COLA project plan on 4/16/08; Key dates for completion are above.</p>
	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p>
	<p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.2a</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Please provide current copies of all project management documents for Turkey Point Units 6 and 7.</p> <div style="background-color: black; height: 200px; width: 100%;"></div> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.2b</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Please list and describe the project management documents and/or systems used to track work completion and schedule status for Turkey Point Units 6 and 7.</p> <p><b>Summary of Contents:</b> Bechtel schedule for 2007-2009 provides items to be completed and estimated date of completion; the schedule acts as a monitoring control to insure that COLA activities are completed on schedule; it also provides early target bar, target bar, progress bar and critical activity bar for following each activity from 2007-2009; also provided is a listing of project management documents and systems used to track work completion and schedule status for Turkey point Units 6&amp;7; listing of 13 key mechanisms to follow project status and communicate project status.</p> <p><b>Conclusions:</b> Bechtel has a very detailed schedule identifying each activity and forecasted date to complete the activity which helps manage the project at a glance; approx. 13 project management documents and systems used to track work completion and schedule status.</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.3a</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/24/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Please provide current copies of all contractor evaluation and quality assurance documents for the Turkey Point Units 6 and 7 projects.</p> <p><b>Summary of Contents:</b> NAP-204 Condition Reporting – Performance Improvement was provided by the company; these reports are used to report hardware deficiencies, such as repetitive failures, abnormal operations or failure mechanisms, or equipment</p>

**Document #:** DR-3.14  
**Date Requested:** 4/21/08  
**Date Received:** 4/24/08  
**Comments:** (i.e., Confidential)

**Document Title and Purpose of Review:** Please provide a description and timeline of NRC and other regulatory applications, approvals, and certifications that are required for Units 6 and 7 over the period 2008-2010.

**Summary of Contents:** FPL provided the schedule of activities for the COLA from 1/1/08-12/31/2012 showing the timeline for preparation, submittal, NRC Review and hearings, and finally approval; FPL provided the same information for the Power Plant Siting Act/Site Certification Application w/ timeline from 4/07-12/12

**Conclusions:** FPL has anticipated and planned for key activities related to the preparation of the COLA and NRC review hearings through 2012; also provided Power plant Siting Act/Site Certification Application Activities 4/15/07-12/31/2012;

**Data Request(s) Generated:**

No. \_\_\_\_\_ Description:

No. \_\_\_\_\_ Description:

**Follow-up Required:**

**Document #:** DR-3.15  
**Date Requested:** 4/21/08  
**Date Received:** 4/24/08  
**Comments:** (i.e., Confidential)

**Document Title and Purpose of Review:** Please provide a description of how the company plans to coordinate the activities and workloads for the St. Lucie/Turkey Point uprate projects with those of the Unit 6 and 7 construction projects. Include discussion of whether the management and support organizations may be involved in both projects, either simultaneously or phased from one to the other during later stages.

**Summary of Contents:** The new nuclear construction projects are fully separate in all organizational and reporting aspects at the implementation level; Each project is supported by certain matrixed business units that provide services to both projects, such as Environmental Services; Further, each project reports up through FPL company reporting relationships to the same senior management;

**Conclusions:** Separate Organization for TP 6&7

**Data Request(s) Generated:**

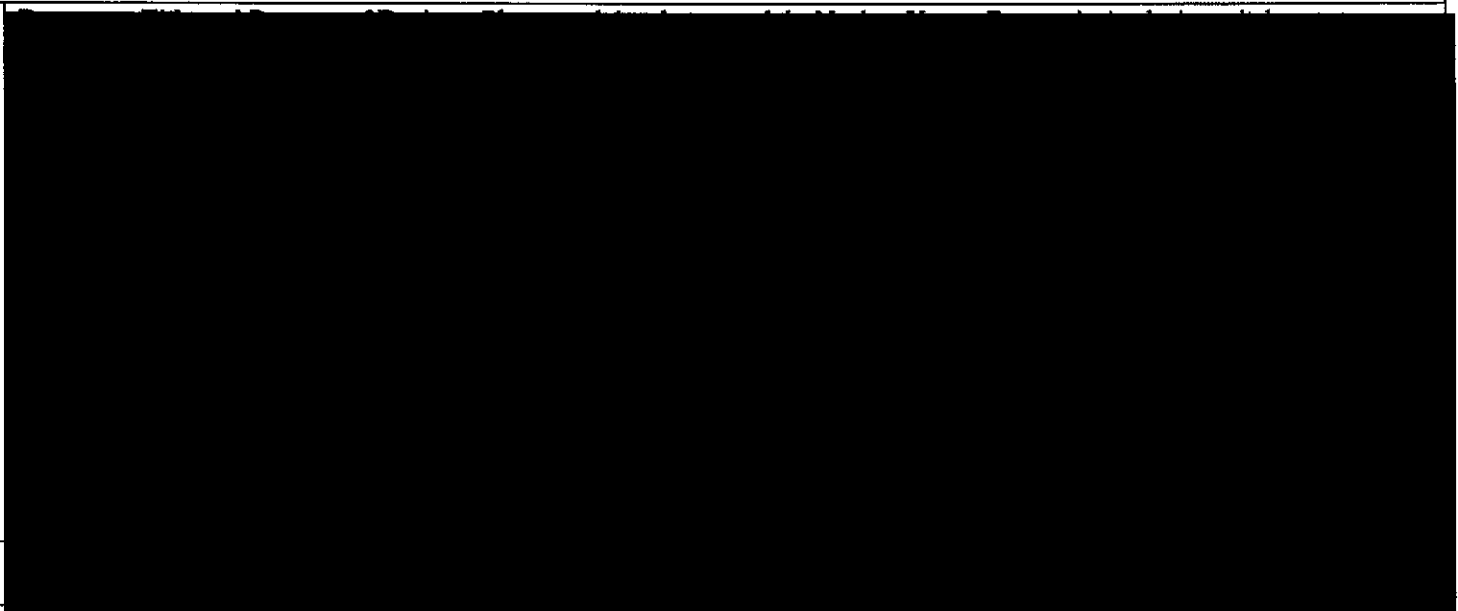
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**Follow-up Required:** Follow-up with staffing needs and ramp-up interview

### Turkey Point Units 3&4 Uprates (Questions 16-29)

**Document #:** DR-3.16  
**Date Requested:** 4/21/08  
**Date Received:** 4/22/08  
**Comments:** (i.e., Confidential)



**Document #:** DR-3.17  
**Date Requested:** 4/21/08

Date Received: 4/22/08  
Comments: (i.e., Confidential)

Conclusions: Difference in costs were different versions of the feasibility study per FPL;

Data Request(s) Generated:

No. \_\_\_\_\_ Description:  
No. \_\_\_\_\_ Description:

Document #: DR-3.18  
Date Requested: 4/21/08  
Date Received: 4/22/08  
Comments: (i.e., Confidential)

Data Request(s) Generated:

No. \_\_\_\_\_ Description:  
No. \_\_\_\_\_ Description:

Follow-up Required: 1.) Follow-up w/FPL managers to review the process and determine whether FPL was able to reduce the costs

Document #: DR-3.19  
Date Requested: 4/21/08  
Date Received: 4/22/08  
Comments: (i.e., Confidential)

Document Title and Purpose of Review: Please provide a current status of each risk item, and its costs, identified on pages 4-8 in the Shaw Stone & Webster BOP Risk Assessment. (response to DR-1.1a, pg. 4-8 SS&W Executive Summary)

Summary of Contents: a.) States that the response to this question is within the SS&W Scoping Study in DR-2.8, but it does not appear to address the risk assessment items requested in DR-3.19

Data Request(s) Generated:

No. \_\_\_\_\_ Description:  
No. \_\_\_\_\_ Description:

Follow-up Required: 1) Follow-up to find out where the risk assessment is updated

Document #: DR-3.20  
Date Requested: 4/21/08  
Date Received: 4/22/08  
Comments: (i.e., Confidential)

Document Title and Purpose of Review: Please describe the reorganization of FPL's nuclear division, when it occurred, and the primary reasons for the reorganization. (response to DR-1.1b, Revision 4, NAP-401)

Summary of Contents: Explains that a reorganization of the Nuclear Projects Department was implemented on January 15, 2008 w/ a VP Nuclear Fleet Project Operations and four Project Directors: a Director of Nuclear Projects Engineering, a Sr. Project Manager Nuclear for Juno Beach Project Controls, and a Sr. Project Manager of Special Projects as direct reports; four Director positions are Nuclear Major Projects Management, Nuclear Projects -Juno, Nuclear Projects-North, and Nuclear Projects-South ; the reason for the reorg was to align the organization to meet the challenges and initiatives of the nuclear fleet and achieve the fleet

<p><b>Document #: DR-3.24</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Please provide the prioritized equipment lead time schedule for the St. Lucie and Turkey Point uprates, if not already provided. (Kundulkar interview)</p> <p><b>Summary of Contents:</b> Page 1 of 5 was redacted; pg. 2 shows key long lead equipment for each unit with timeframes for Bid</p> <p><b>Conclusions:</b> FPL tracks the progress of long lead and other items pertinent to the project completion to assure the equipment is delivered on-site prior to actual use.</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.25</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Provide copies of Weekly Project Scheduling updates for the uprates to-date, if not already provided. (Kundulkar interview)</p> <p><b>Summary of Contents:</b> Per discussion with staff, attached is one weekly up date schedule for each month that they have been prepared. The EPU Project schedule is Draft at this time. The baseline schedule is being developed. The schedules provided are for the weeks of 1/4/08, 2/1/08, 3/7/08, and 4/4/08. The schedules included are the engineering and modification up to date schedules for both St. Lucie and Turkey Point units. They are the 4 week and 8 week look ahead schedules. Additionally, the full engineering and modification schedules are included for the week of 4/4/08. The full schedule is updated when the look ahead schedule is updated; twenty reports are provided covering the timeframe 1/4/08 through 4/4/08, consisting of ten PSL reports and ten PTN reports; the reports are modification schedules, engineering schedules and full engineering schedules differing in length from a few pages to 291 pages;</p> <p><b>Conclusions:</b> FPL completes one month and two month look ahead for engineering modifications as the project moves closer to implementation these will be more detailed and beneficial to work performance activities;</p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.26a</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b></p>

<p><b>Document #: DR-3.26b</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p>[REDACTED]</p> <p><b>Summary of Contents:</b> Not applicable to the EPU project</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. ____ Description:  No. ____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.26c</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p>[REDACTED]</p> <p><b>Summary of Contents:</b> Not applicable to the EPU project</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. ____ Description:  No. ____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.26d</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p>[REDACTED]</p> <p><b>Data Request(s) Generated:</b>  No. ____ Description:  No. ____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.26e</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p>[REDACTED]</p> <p><b>Data Request(s) Generated:</b>  No. ____ Description:  No. ____ Description:</p> <p><b>Follow-up Required:</b> Get a copy of the plan</p>
<p><b>Document #: DR-3.26f</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b></p>	<p>[REDACTED]</p>



	<p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.26g</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p>[Redacted]</p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.27</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Provide all scorecard and other written evaluations, on nuclear vendors used in the Turkey Point and St. Lucie uprates, for the period 2006-2008 to date. (response to DR-1.3b)</p> <p>[Redacted]</p> <p><b>Conclusions:</b> because most of the early contracts were for services FPL has not completed any scorecards to date. FPL does not complete scorecards for service contractors;</p> <p><b>Data Request(s) Generated:</b>          No. _____ Description:          No. _____ Description:</p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-3.28</b>  <b>Date Requested: 4/21/08</b>  <b>Date Received: 4/22/08</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Provide a copy of all handouts and presentation materials used for the Annual Joint Owners Meetings for St. Lucie Unit 2. (response to DR-1.7a)</p> <p><b>Summary of Contents:</b> a.) Pages of the presentation are not included; FPL noted on the document they provided that "Pages not applicable to the uprate have been redacted"; b.) Agenda shows that major topics are: Power Uprate Basics, St. Lucie Uprate Parameters, Uprate Organization, Project Milestones, Proposed Modifications, and Progress To-Date; Presentation shows Unit 2 Uprate Team Key Players as Westinghouse for fuel design and safety analysis, and for NSSS system &amp; component analysis;</p> <p>[Redacted]</p> <p>project scope and cost, Major contract strategy is finalized, Engineering and modification schedules are developed, key EPU design parameters are identified, Completing EPU core designs, Completed initial PEPSE heat balances, developed condensate and feed water hydraulic model, issued HP and LP turbine specs., issued main generator specification, and are developing safety analysis ground rule assumptions; <b>Federal Approvals</b> mentions need to change operating licenses, NRC technical and safety aspects of the project, NRC license amendment requests to be submitted by FPL late in 2009 and separate filings will be made for Units 1 and 2;</p>

NRC review & approval takes about 16 months; Interface w/Joint Owners describes increase power output by approx. 103 Mwe at

[REDACTED]

**Conclusions:**

**Data Request(s) Generated:**

No. \_\_\_\_\_ Description:

No. \_\_\_\_\_ Description:

[REDACTED]

**Document #:** DR-3.29  
**Date Requested:** 4/21/08  
**Date Received:** 4/22/08  
**Comments:** (i.e., Confidential)

**Document Title and Purpose of Review:** Please provide copies of the Monthly Operating Report, and meeting minutes, for 2006 to-date unless already provided.  
(response to DR-1.7a)

[REDACTED]

**Conclusions:** Monthly Progress Reports assess status of projects and give the major accomplishments and potential roadblocks;

**Data Request(s) Generated:**

No. \_\_\_\_\_ Description:

No. \_\_\_\_\_ Description:

**Follow-up Required:** 1.) Were the submittals to state or county environmental agencies? 2) What are the items of potential delay re: TP? (cooling and crocodiles?)

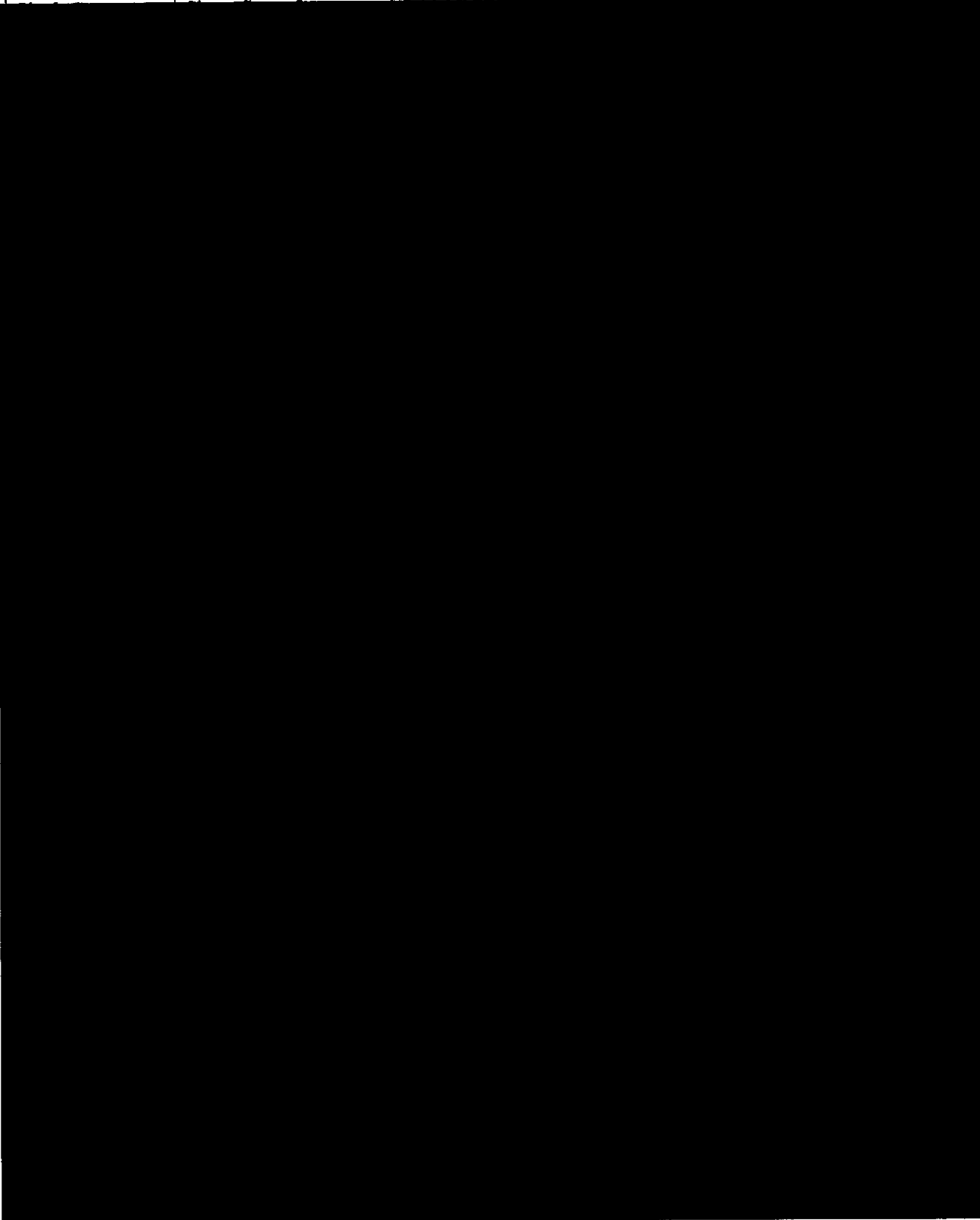
Division of Competitive Markets and Enforcement  
Bureau of Performance Analysis  
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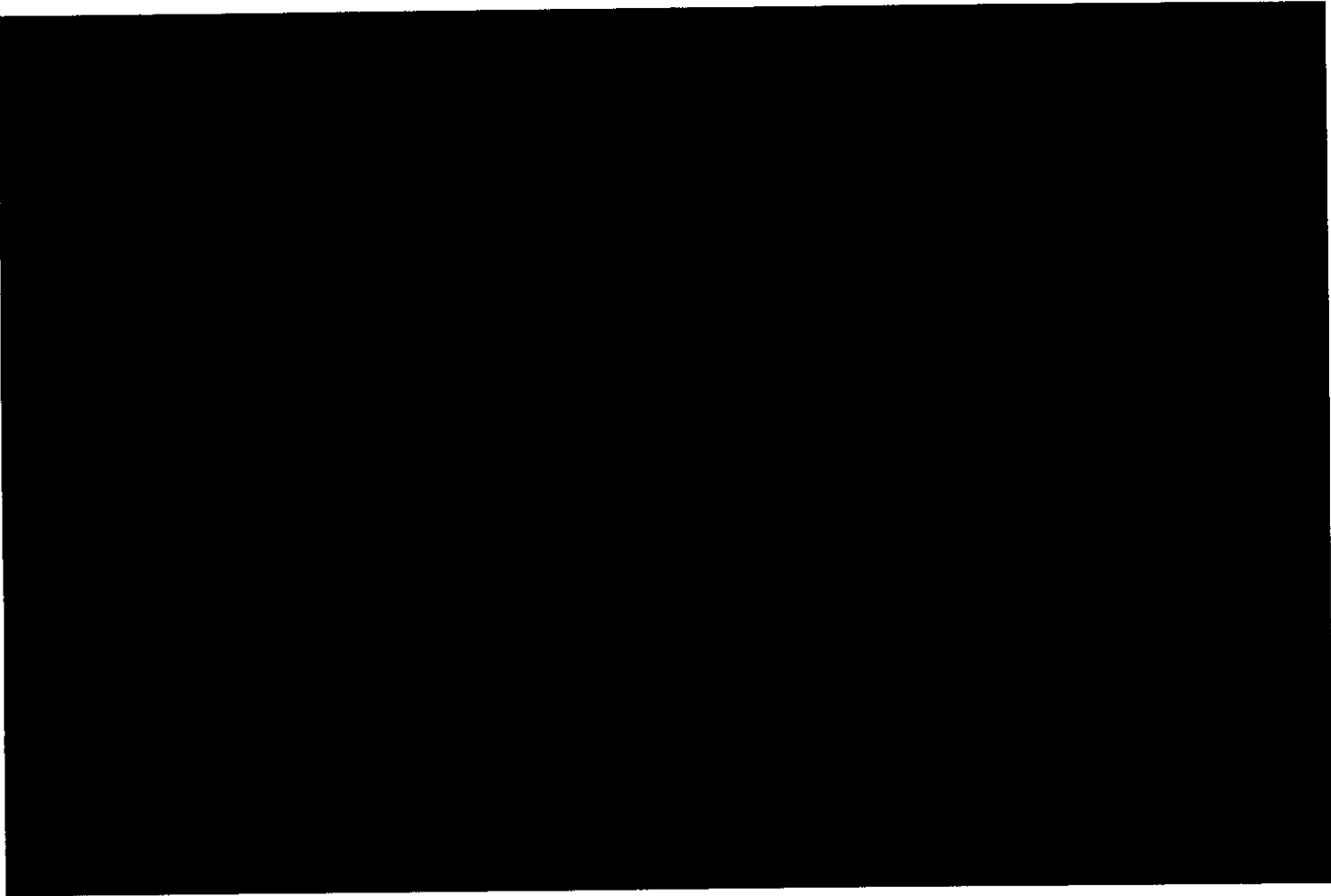
FPL Turkey Point New Units Contract Summary

Contract /Type	Vendor	Work	Amount	Comments
[Redacted Content]				

FPL Uprate Contracts Summary

Contract/Type	Vendor	Work	Amount	Comments
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**FPL PROPOSED UPRATE EXPANSION  
OF NUCLEAR POWER PLANTS**

<b>Subject</b>	<b>Turkey Point Units 3 and 4</b>	<b>St Lucie Units 1 and 2</b>
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