



Jessica A. Cano  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
(561) 304-5226  
(561) 691-7135 (Facsimile)

September 5, 2014

**-VIA HAND DELIVERY-**

Carlotta Stauffer, Director  
Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**REDACTED**

RECEIVED-FPSC  
14 SEP -5 PM 1:17  
COMMISSION  
CLERK

**Re: Docket No. 140009-EI**

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a Request for Confidential Classification of Audit PA-14-01-001 Work Papers. Seven copies of FPL's request, including Exhibits C and D, are included. Also included are one copy of Exhibit A and two copies of Exhibit B.

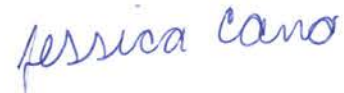
Exhibit A consists of the confidential documents, and all information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C consists of FPL's justification table supporting its Request for Confidential Classification. Exhibit D contains three affidavits in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C in Microsoft Word format.

Florida Power & Light Company  
700 Universe Boulevard, Juno Beach, FL 33408

COM	_____
AFD	_____ 1
APA	_____ 1
ECO	_____ 1
ENG	_____ 1
GCL	_____ 1
IDM	_____ 2 + redacted to B and CD
TEL	_____
CLK	_____

Please contact me if there are any questions regarding this filing.

Sincerely,



Jessica Cano  
Fla. Bar No. 0037372

Enclosures

cc: Parties of record w/out confidential attachment

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost                    )  
Recovery Clause                    )

Docket No. 140009-EI  
Filed: September 5, 2014

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
AUDIT PA-14-01-001 WORK PAPERS**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit PA-14-01-001 ("the Audit") and reflected in Staff's work papers. In support of its request, FPL states as follows:

1. During the Audit, Staff was provided with various confidential documents. By letter dated August 15, 2014, Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A includes a copy the confidential documents, in which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of a copy of the confidential documents, in which all information that is entitled to confidential treatment has been redacted.

c. Exhibit C is a table containing the specific line, column and page references to the confidential information, and references to the specific statutory basis or

bases for the claim of confidentiality and to the affidavit in support of the requested confidential classification.

d. Exhibit D includes the affidavits of Martin Cox, Stephanie Castaneda, and Antonio Maceo in support of FPL's request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private in that the disclosure of the information would cause harm to customers or FPL's business operations, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As the affidavits included in Exhibit D indicate, some of information in the Audit work papers is proprietary, confidential business information. The Audit work papers contain information related to reports of internal auditors. This information is protected from public disclosure by Section 366.093(3)(b), Florida Statutes. The work papers also contain information related to bids or contractual data, such as pricing or other terms, the public disclosure of which would violate nondisclosure provisions of FPL's contracts with certain vendors and impair FPL's ability to contract for goods or services on favorable terms in the future. Such information is protected from public disclosure by Section 366.093(3)(d), Florida Statutes. The work papers also include competitively sensitive information which, if disclosed, could impair the



competitive interests of the provider of the information. Such information is protected from public disclosure by Section 366.093(3)(e), Florida Statutes.

5. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Jessica A. Cano  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5226  
Facsimile: (561) 691-7135

By:

  
Jessica A. Cano  
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE  
DOCKET NO. 140009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification of Audit PA-14-01-001 Work Papers\* was served via hand delivery\*\* or U.S. mail this 5th day of September, 2014 to the following:

Keino Young, Esq.\*\*  
Caroline Klancke, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
kyoung@psc.state.fl.us  
cklancke@psc.state.fl.us

J. R. Kelly, Esq.  
Charles Rehwinkel, Esq.  
Joseph McGlothlin, Esq.  
Erik L. Sayler, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
Kelly.jr@leg.state.fl.us  
Rehwinkel.Charles@leg.state.fl.us  
mcglothlin.joseph@leg.state.fl.us  
Sayler.Erik@leg.state.fl.us

J. Michael Walls, Esq.  
Blaise N. Gamba, Esq.  
Carlton Fields Jordan Burt, P.A.  
P.O. Box 3239  
Tampa, Florida 33601-3239  
mwalls@cfjblaw.com  
bgamba@cfjblaw.com  
Attorneys for Duke Energy

John T. Burnett, Esq.  
Dianne M. Triplett, Esq.  
Progress Energy Service Company, LLC  
299 First Avenue North  
St. Petersburg, Florida 33701  
john.burnett@duke-energy.com  
dianne.triplett@duke-energy.com  
Attorneys for Duke Energy

Robert Scheffel Wright  
John T. LaVia  
Gardner Bist Wiener Wadsworth Bowden  
Bush Dee LaVia & Wright, P.A.  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
Schef@gbwlegal.com  
Jlavia@gbwlegal.com  
Attorneys for FRF

Matthew Bernier, Sr. Counsel  
Mr. Paul Lewis, Jr.  
106 East College Ave., Suite 800  
Tallahassee, Florida 32301-7740  
Matthew.bernier@duke-energy.com  
paul.lewisjr@duke-energy.com

James W. Brew, Esq.  
F. Alvin Taylor, Esq.  
Brickfield Law Firm  
1025 Thomas Jefferson Street, N.W., 8<sup>th</sup> Floor  
Washington, D.C. 20007  
jbrew@bbrslaw.com  
ataylor@bbrslaw.com  
Attorneys for PCS Phosphate-White Springs

Jon C. Moyle, Jr., Esq.  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
Attorney for FIPUG

George Cavros  
120 E. Oakland Park Blvd, Ste. 105  
Fort Lauderdale, FL 33334  
george@cavros-law.com

By: Jessica Cano  
Jessica A. Cano  
Fla. Bar No. 0037372

\* Exhibits to this Request are not included with the service copies, but copies of Exhibits B, C, and D are available upon request.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**



**EXHIBIT B**

**REDACTED COPIES**

# **EXHIBIT B**

*Audit Work Papers*

*Review of*

*Florida Power and Light Company's Project  
Management*

*Internal Controls for*

*Nuclear Plant Uprate and Construction Projects*

*2014*

*PA-14-01-001*

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- 10. ANALYSIS / SAMPLING*
- 11. FINDINGS*
- 12. MISCELLANEOUS*

## ***2. Company Contacts***

## Company Contacts

Mrs. Soria Talbot  
[Soria.Talbot@fpl.com](mailto:Soria.Talbot@fpl.com)  
(561) 694-2411  
(561) 676-0326 (cell)

Mr. Travis Contratto  
[Travis.Contratto@fpl.com](mailto:Travis.Contratto@fpl.com)  
(561) 691-2405  
(561) 401-2461 (cell)  
(561) 691-7091 (fax)

Mrs. Tiffany Cordes-Cohen  
[Tiffany.Cohen@fpl.com](mailto:Tiffany.Cohen@fpl.com)  
(561) 694-4184  
(561) 635-8187 (cell)  
(561) 691-7577 (fax)

Ms. Lynne D. Adams  
[lynne\\_adams@fpl.com](mailto:lynne_adams@fpl.com)  
(850) 521-3900  
(850) 521-3939 (fax)

### ***3. Administrative***



COMMISSIONERS:  
RONALD A. BRISÉ, CHAIRMAN  
LISA POLAK EDGAR  
ART GRAHAM  
EDUARDO E. BALBIS  
JULIE I. BROWN

STATE OF FLORIDA



DALE MAILHOT, DIRECTOR  
OFFICE OF AUDITING & PERFORMANCE  
ANALYSIS  
(850) 413-6854

## Public Service Commission

November 22, 2013

Mr. Kenneth A. Hoffman  
VP, Regulatory Affairs  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301

Dear Mr. Hoffman:

The Office of Auditing and Performance Analysis is initiating the annual audit of project management internal controls for Florida Power & Light Company's nuclear plant uprate and new construction projects. This audit will assist technical staff in the Nuclear Cost Recovery Clause docket (140009-EI).

The focus of this audit will be the review of the internal controls for contract management, contractor oversight, and overall project management efforts for completing the St. Lucie and Turkey Point uprates and the planned new units at Turkey Point 6&7. These topics, as well as new project developments, risks and challenges, and current project status will also be reviewed.

Mr. David Rich is designated as project manager for this review, which is estimated to be completed by May 30, 2014. Mr. Rich is responsible for making you aware of our progress and ensuring that our review is independent and accurate. At the conclusion of the review, you will have an opportunity to review and respond to the report draft prior to release.

In preparation for the review, we request that the following actions be taken by FPL:

- ▶ Designate an FPL official to liaison with staff. This individual should be capable of rendering an opinion on the proprietary or confidential nature of information responsive to staff requests. Please advise Mr. Rich of the FPL designee by December 4, 2013.
- ▶ Provide staff the disks returned to FPL control at the conclusion of the last annual review. An attachment lists the disks (numbered 1 to 59).
- ▶ Provide responses to the attached initial data requests no later than January 17, 2014. For clarity and ease of tracking, separate requests are provided for the Uprate (EPU) and Turkey Point 6&7 (PTN) projects. Staff encourages partial company responses prior to the due date. New or additional information may be supplemented when available.
- ▶ Provide future monthly management reports, through April 2014, when available.

Details of providing responses to document requests can be coordinated between the designated FPL liaison and Mr. Rich. Should the need arise to claim confidential treatment of

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PSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

Mr. Kenneth A. Hoffman  
Page 2  
November 22, 2012

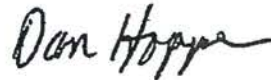
material requested during this audit, please follow the procedure outlined in *Chapter 25-22.006 Florida Administrative Code*.

During the audit, please use the Document Request/Notice of Intent form to transmit each set of responses and request potential confidentiality. To maintain continued confidential handling of these documents at the conclusion of the audit, FPL must file a request for confidential classification with the Office of Commission Clerk. This request must be filed in writing within 21 days of receipt of the draft audit report or the audit exit conference.

Thank you in advance for your cooperation and the efforts of all company personnel toward the satisfactory and expeditious completion of this review. Staff will make every effort to minimize interruptions to your schedule and provide a fair and impartial review.

Please contact David Rich (850) 413-6830, or Jerry Hallenstein (850) 413-6818 if you have any questions regarding this review.

Sincerely,



Dan Hoppe  
Assistant Director  
Office of Auditing and Performance Analysis

Attachments

cc: Dale Mailhot  
Office of Public Counsel  
Carl Vinson  
Jim Breman  
Mark Laux

# FPL DATA REQUEST RESPONSE LOG -2013

As of 06.06.13

*Supersedes all others with an earlier date*

Disk	DR	Project	Questions	Date Rec'd	Confidential Items
1	DR-1	EPU	EPU DR-1.6	01/09/13	All
2	DR-1	EPU	EPU DR-1.6a	01/09/13	All
3	DR-1	PTN	PTN -DR-1.1 thru 1.6, 1.8 thru 1.19, 1.21, 1.22, 1.24, 1.26 thru 1.29, 1.31, 1.33 thru 1.48, 1.51, 1.53 thru 1.55, & 1.57 thru 1.68	01/09/13	None
4	DR-1	PTN	PTN DR-1.7, 1.20, 1.23, 1.25, 1.30, 1.32, 1.49, 1.50, 1.52, & 1.56	01/09/13	All
5	DR-2	EPU	EPU DR-2.1 thru 2.12	01/04/13	All
6	DR-1	EPU	EPU DR-1.1, 1.4, 1.7, 1.8, 1.9, 1.10, 1.14, 1.15, & 1.20	01/14/13	All
7	DR-1	EPU	EPU DR-1.5, 1.11, 1.16 thru 1.18 & 1.22	01/14/13	None
8	DR-1	EPU	EPU DR-1.2	01/16/13	None
9	DR-1	EPU	EPU DR-1.12, 1.13, 1.19, 1.21, & 1.23	01/16/13	All
10	DR-1	PTN	PTN -DR-1.30 (partial, new reports)	01/17/13	All
11	DR-1	PTN	PTN -DR-1.16, 1.22, 1.31, 1.44e, & 1.68	01/17/13	None
12	DR-1	EPU	EPU DR-1.3	01/25/13	All
13	DR-1	EPU	EPU DR-1.10 a thru d	01/25/13	All
14	DR-1	EPU	EPU DR-1.4f; 1.6a&b; 1.7b; 1.10b&d; 1.15b; 1.16a; 1.20a,b,&c; 1.21a; 1.23d	01/30/13	All
15	DR-1	EPU	EPU DR-1.1c; 1.4b,c,e,g,&h; 1.5b; 1.6d, 1.11c&d; 1.12a,b,&c; 1.131,c,&g; 1.14a,b,&c; 1.15a; 1.16a	01/30/13	None
16	DR-1	PTN	PTN DR-1.38	01/30/13	None
17	DR-3	EPU	EPU DR-3.1, 3.2, 3.3, & 3.10	02/13/13	All
18	DR-3	EPU	EPU DR-3.6, 3.11, 3.12	02/14/13	All
19	DR-3	EPU	EPU DR-3.4, 3.5, 3.7, 3.8, 3.9, 3.13	02/15/13	All
20	DR-1	PTN	PTN -DR-1.30 (partial, 01/2012 report s)	02/18/13	All
21	DR-1	PTN	PTN -DR-1.16, 1.22, 1.31, 1.44e, & 1.68	02/18/13	None



22	DR-1	EPU	EPU DR- 1.4f; 1.6a&b; 1.7b; 1.10b&d; 1.12c; 1.14a; 1.15b; 1.16a; 1.20a,b,&c; 1.21a; 1.23d	02/27/13	All
23	DR-1	EPU	EPU DR-1.1c; 1.4b,c,e,g,&h; 1.5b; 1.6d, 1.11c&d; 1.12a &b, 1.13a,c,&g; 1.14b&c; 1.15a; 1.16c (January update)	02/27/13	None
24	DR-1	EPU	EPU DR- 1.1a revised & 1.8c revised	02/28/13	All
25	DR-1	EPU	EPU DR- 1.7b revised	03/07/13	All
26	DR-4	EPU	EPU DR-4.1	03/07/13	None
27	DR-1	EPU	EPU DR- 1.16c revised	03/13/13	None
28	DR-1	PTN	EPU DR- 1.16 (Feb), 1.22, 1.31, 1.44, & 1.68	03/18/13	None
29	DR-1	PTN	EPU DR- 1.30 revised	03/18/13	All
30	DR-1	EPU	EPU DR-1.4f; 1.6a-b; 1.7b; 1.10 b & d; 1.12b-c; 1.14a; 1.15b; 1.20a-c; 1.21a (February updates)	03/18/13	All
31	DR-1	EPU	EPU DR-1.1c; 1.4b,c,e,g,&h; 1.5b; 1.6d, 1.11c&d; 1.12a, 1.13a,c,&g; 1.14b&c; 1.15a; 1.16a&c; 1.23b (February update)	03/18/13	None
32	DR-1	EPU	DR-1.1c; 1.4b, c, e, g, & h; 1.5b; 1.6d; 1.10b; 1.11 c&d; 1.12a, b, &c; 1.13a, c,& g; 1.14b; 1.15a; 1.16a&c; 1.23d	4/16/13	None
33	DR-1	EPU	DR-1.4f; 1.6a&b; 1.7b; 1.10d; 1.14a&c; 1.15b; 1.20a,b,c; 1.21a (March updates)	4/16/13	All
34	DR-1	PTN	DR-1.16; 1.22; 1.31; 1.44e; 1.68 (March updates)	4/16/13	None
35	DR-1	PTN	DR-1.30 (March updates)	4/16/13	All
36	DR-2	PTN	DR-2.1; 2.2; 2.3; 2.4; 2.7	5/09/13	All
37	DR-2	PTN	DR-2.5; 2.6; 2.8	5/09/13	None
38	DR-5	EPU	DR-5.2 thru 5.7 and DR-5.9 thru 5.13	5/10/13	All
39	DR-5	EPU	DR-5.1; 5.5, 5.8	5/10/13	None
40	DR-3	PTN	DR-3.1 thru 3.4; 3.6 thru 3.8; 3.10 thru 3.12	5/13/13	None
41	DR-3	PTN	DR-3.5 & 3.9	5/13/13	All
42	DR-4	PTN	DR-4.1 thr 4.4; 4.6, & 4.7	5/13/13	None
43	DR-5	EPU	DR-5.7 Supplemental	5/13/13	All



44	DR-5	EPU	DR-5.12 Supplemental	5/14/13	All
45	DR-6	EPU	DR-6.6	5/14/13	All
46	DR-6	EPU	DR-6.1 & 6.2	5/14/13	All
47	DR-6	EPU	DR-6.7	5/15/13	All
48	DR-1	PTN	DR-1.30 (April updates)	5/16/13	All
49	DR-1	PTN	DR-1.16;1.22;1.31;1.44e; 1.68 (April updates)	4/16/13	None
50	DR-1	EPU	DR-1.4c&f; 1.7b;1.10b&d;1.14a; 1.15b; 1.21a (April updates)	5/20/13	All
51	DR-1	EPU	DR-1.1c; 1.4b, e, g, & h; 1.5b; 1.6d; 1.11c&d; 1.12a, b, & c; 1.13a, c & g; 1.14a, b, & c; 1.15b, 1.16a&c; 1.23d; (April updates)	5/20/13	None
52	DR-1	EPU	DR-1.6a&b; 1.20a&b; 3.5 (April updates)	5/21/13	All
53	DR-1	EPU	DR-1.33; 1.20c; (April updates)	5/21/13	None
54	DR-6	EPU	DR-6.3; 6.4; 6.5	5/21/13	All
55	DR-5	EPU	DR-5.10 (Supplemental)	5/22/13	All
56	DR-1	EPU	DR-1.6b (Revised)	5/24/13	All
57	DR-7	EPU	DR-7.1; 7.3; 7.4; 7.5	6/03/13	All
58	DR-7	EPU	DR-7.2	6/03/13	None
59	DR-5	EPU	DR-5.6 Supplemental	5/30/13	All

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
LISA POLAK EDGAR  
RONALD A. BRISÉ  
EDUARDO E. BALBIS  
JULIE I. BROWN

STATE OF FLORIDA



OFFICE OF  
AUDITING & PERFORMANCE ANALYSIS  
DALE MAILHOT  
DIRECTOR  
(850) 413-6854

## Public Service Commission

May 27, 2014

Ms. Lynne Adams  
Regulatory Issues Manager, Regulatory Affairs  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

Dear Ms. Adams:

Enclosed is a draft copy of the staff audit report, *Florida Power & Light's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects*. This audit report documents the controls associated with the FPL Extended Power Uprate and New Nuclear construction projects. It is anticipated that staff will file the report as an exhibit to testimony in the Nuclear Cost Recovery Clause in Docket No. 140009-EI.

The draft report is provided to allow FPL the opportunity to review the report for factual accuracy and confidentiality. The transfer of this draft report serves as a preliminary exit conference. At the conclusion of hearings for Docket No. 140009-EI, audit staff will schedule a final exit conference to address the remaining staff-created and FPL-provided documents.

You may file a request for confidential classification on portions of the report, in accordance with *Chapter 25-22.006(3) Florida Administrative Code*.

Absent good cause shown, failure to file a request shall constitute a waiver. Staff is available to discuss the factual accuracy of the report over the next two weeks during the review period. A teleconference can be arranged to discuss potential corrections.

Please be mindful that the report must be published and staff testimony must be filed by June 20, 2014. Thank you for the cooperation extended by FPL and all employees who participated in this

Ms. Lynne Adams  
Page 2  
May 27, 2014

review. If you have any questions, please contact the Project Manager, David Rich, at (850) 413-6830 or, in his absence, Jerry Hallenstein (850) 413-6818.

Sincerely,

Carl S. Vinson Jr.  
Public Utilities Supervisor

Enclosure

cc: Dale Mailhot

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
LISA POLAK EDGAR  
RONALD A. BRISÉ  
EDUARDO E. BALBIS  
JULIE I. BROWN

STATE OF FLORIDA



OFFICE OF  
AUDITING & PERFORMANCE ANALYSIS  
DALE MAILHOT  
DIRECTOR  
(850) 413-6854

## Public Service Commission

May 27, 2014

Ms. Lynne Adams  
Regulatory Issues Manager, Regulatory Affairs  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

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Sincerely,



Carl S. Vinson Jr.  
Public Utilities Supervisor

Enclosure

cc: Dale Mailhot



State of Florida



**Public Service Commission**  
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

---

**DATE:** May 27, 2014  
**TO:** Dale Mailhot, Director, Office of Auditing and Performance Analysis  
**FROM:** David Rich, Public Utilities Analyst IV  
**RE:** Copying of Confidential Information— FPL Nuclear Draft Report

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Pursuant to APM 11.04(C), I request permission to make four copies of the 2014 draft audit report *Review of Florida Power & Light Company's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects*. The draft report contains information the company has claimed confidential under a Notice of Intent.

Two copies will be provided to the Office of General Council and two copies to the Office of Industry Development. Audit staff will collect the copies after review in accordance with the APM.

*Approved*  
*DM 5-27-14*

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** July 7, 2014  
**TO:** Keino Young, Senior Attorney, Office of the General Counsel  
**FROM:** David Rich, Public Utility Analyst IV, Office of Auditing and Performance Analysis  
**RE:** FPL Request for Confidential Classification of Project Management Internal Controls Audit Report PA-14-01-002, Docket No. 140009

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Audit staff has reviewed FPL's confidentiality request dated June 17, 2014 (DN# 03067-14).

Staff believes the request meets requirements of Florida Statute 366.093(3) for proprietary confidential business information and should be protected as requested.

If you have any questions related to this memo please contact me.



State of Florida



**Public Service Commission**  
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**M-E-M-O-R-A-N-D-U-M-**

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**DATE:** July 7, 2014  
**TO:** Office of Auditing and Performance Analysis, Office of Primary Responsibility  
**FROM:** OFFICE OF COMMISSION CLERK  
**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION  
DOCKET NO: 140009-EI DOCUMENT NO: 03067-14  
DESCRIPTION: FPL (Cano) - (CONFIDENTIAL) Portions of Audit Report PA-14-01-002, titled "Review of Florida Power & Light Company's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects."  
SOURCE: Florida Power & Light Company

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The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.  
 The utility has provided enough details to perform a reasoned analysis of its request.  
 The material has been received incident to an inquiry.  
 The material is confidential business information because it includes:  
     (a) Trade secrets;  
     (b) Internal auditing controls and reports of internal auditors;  
     (c) Security measures, systems, or procedures;  
     (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;  
     (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;  
     (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;  
 The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.  
 The material appears not to be confidential in nature.  
 The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by David Rich, Public Utility Analyst IV on 7/7/14, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
LISA POLAK EDGAR  
RONALD A. BRISÉ  
EDUARDO E. BALBIS  
JULIE I. BROWN

STATE OF FLORIDA



OFFICE OF  
AUDITING & PERFORMANCE ANALYSIS  
DALE MAILHOT  
DIRECTOR  
(850) 413-6854

## Public Service Commission

August 15, 2014

Mr. Kenneth A. Hoffman  
Vice President Regulatory Affairs  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

Dear Mr. Hoffman:

Enclosed is a copy of the final staff-generated work papers for the *Review of Florida Power & Light Company's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects*. Also included are FPL-generated CD disks responsive to staff document requests. Staff requests FPL maintain these disks, for return to staff during the 2015 review.

FPL may file a request for confidentiality of portions of these work papers, in accordance with *Chapter 25-22.006(3) Florida Administrative Code*. This request must be filed with the Office of Commission Clerk no later than 21 days from the date of receipt. Therefore, the filing will be due by the close of business on **September 5, 2014**. Absent good cause, failure to file a request will constitute a waiver of confidentiality. Staff stands ready to assist and answer any questions you may have related to the work papers.

The Office of Auditing and Performance Analysis appreciates the assistance afforded our staff in completing this review. If you have any questions or concerns, please contact David Rich at (850) 413-6830.

Sincerely,

A handwritten signature in cursive script that reads "Dan Hoppe".

Dan Hoppe  
Assistant Director  
Office of Auditing and Performance Analysis

Enclosures

cc: Dale Mailhot, Director, Office of Auditing and Performance Analysis



# FPL DATA REQUEST RESPONSE LOG -2014

As of 06.17.14

*Supersedes all others with an earlier date*

*Red = Claimed confidential via Notice of Intent (NOI)*

Disk	DR	Project	Questions	Date Rec'd	Confidential Items
1	DR-1	EPU	EPU DR-1.1, 1.5, 1.6, 1.14, 1.18, 1.19, 1.23, 1.24, 1.26 - 1.30, 1.32, & 1.33	01/17/14	All
2	DR-1	EPU	EPU DR-1.2 thru 1.4, 1.7 thru 1.13, 1.15 thru 1.17, 1.20 thru 1.22, 1.25, & 1.31	01/17/14	None
3	DR-1	PTN	PTN DR-1.21, 1.26, 1.32 thru 1.34, 1.36, 1.38, 1.41 thru 1.43	01/17/14	All
4	DR-1	PTN	PTN DR-1.1 thru 1.20, 1.22 thru 1.25, 1.27 thru 1.31, 1.35, 1.37, 1.39 thru 1.40, 1.42, & 1.44 thru 1.47	01/17/14	None
5	DR-1	EPU	Revision to DR-1.4 and 1.21	02/18/14	None
6	DR-1	PTN	February monthly updates for DR-1.18, 1.23, 1.27, 1.38, 1.42, & 1.47	02/18/14	None
7	DR-1	PTN	PTN DR-1.26 (updates)	02/18/14	All
8	DR-1	PTN	March monthly updates for DR-1.18, 1.23, 1.27, 1.38, & 1.47	03/18/14	None
9	DR-1	PTN	PTN DR-1.26 & 1.42 (updates)	03/18/14	All
10	DR-1	PTN	PTN DR-1.26 & 1.42 (updates)	04/15/14	All
11	DR-1	PTN	Revision to DR-1.6, 1.15, & 1.28	04/15/14	None
12	DR-1	PTN	April monthly updates for DR-1.18, 1.23, 1.27, 1.38, & 1.47	04/15/14	None
13	DR-1	PTN	Revision to DR-1.1	05/06/14	None
14	DR-1	PTN	May monthly updates for DR-1.18, 1.23, 1.27, 1.38, & 1.47	05/15/14	None
15	DR-1	PTN	PTN DR-1.26 & 1.42 (May updates)	05/15/14	All
16	DR-3	EPU	EPU DR-3.1	05/20/14	None
17	DR-3	EPU	EPU DR-3.3	05/20/14	All
18	DR-3	EPU	EPU DR-3.2	05/23/14	All
19	DR-1	PTN	June monthly updates for DR-1.18, 1.23, 1.27, 1.38, & 1.47	06/16/14	None
20	DR-1	PTN	PTN DR-1.26 & 1.42 (June updates)	06/16/14	All

## ***4. Workload Control Form***

**UNDOCKETED PROJECT**

This schedule is an internal planning document and subject to revision.

Control No: PA-14-01-001 Date Prepared: 01/3/14  
 Source of Project: ECR Title: 2014 Nuclear Controls Review for DEF/FPL Nuclear Cost Recovery Clause

**Section 1**

Type:  E - Energy     T - Telecommunications     G - Generic     W - Water and Wastewater

OPR:  CCA     RCP     ECR     RCA     SCR     SGA     GCL

**Section 2**

**What is to be done:** A review of FPL/DEF project management and cost controls for nuclear uprates and new construction projects.

**Why it is to be done:** To assure FPL/DEF has established effective internal controls for management of nuclear plant construction costs, and that the companies comply with applicable standards, rules, laws and regulations for nuclear plant uprates and new construction projects.

OPR Staff Assigned	Task	Staff	Due Date
David Rich/Jerry Hallenstein - FPL	Preliminary Survey and Initial Document Request	DR/JH-FPL TC/LF-DEF	01/15/14
Tripp Coston/Lynn Fisher - DEF	March Filings by Companies (2013 True-up)	DR/JH-FPL TC/LF-DEF	03/01/14
	Field Visits and Interviews Completed	DR/JH-FPL TC/LF-DEF	04/04/14
	May Filings by Companies (Feasibility/Current Year)	DR/JH-FPL TC/LF-DEF	05/01/14
	Draft to Company	DR/JH-FPL TC/LF-DEF	05/30/14
	Report Published	DR/JH-FPL TC/LF-DEF	06/20/14
	Staff Testimony Filed	DR/JH-FPL TC/LF-DEF	06/25/14
	Hearing	DR/JH-FPL TC/LF-DEF	08/04-08/14
<b>Director/Project Leader</b>			
Carl Vinson			
<b>Staff Counsel (GCL)</b>			
Michael Lawson			
<b>OCR Staff</b>			
Mark Laux, Jim Breman			
<b>(OPR Director/Date)</b>			
Dale Mailhot			
<b>(OCR Director/Date)</b>			
Marshall Willis			

## ***5. Work Plan***



**Performance Analysis Section  
2014 Work Plan  
Florida Power & Light Company (FPL)  
New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
<b>NEW CONSTRUCTION</b>			
<b>2.1 Project Planning</b>			
<p>What is the current status of the project?</p> <p>How has the scope of the project changed in light of the stipulation?</p>	<p>Update and describe project <i>planning</i> made since the last review for the project and its effect on the project schedule and costs.</p> <p>Obtain and document any external reviews performed relative to <i>planning</i> since the last review.</p> <p>Review any detailed internal feasibility studies completed relative to project/<i>planning</i> scope changes.</p> <p>Identify the potential impacts of the Fukushima accident, Waste Confidence, and other regulatory decisions on the project in terms of strategy, timing, feasibility and other decisions under FPL control.</p>	<p>The project remains in the LICENSING phase.</p> <p>NRC licensing process defines the project critical path and will remain FPL's primary focus beyond 2014.</p>	<p>None. Continue monitoring through end-2014 and beyond.</p>
<p>What is the current project schedule?</p> <p>What is the expected NRC COLA approval date?</p>	<p>Review and update the status of project planning, engineering, equipment modification, and phasing of work schedules to complete the licensing portion of the project, and identify any potential delays.</p> <p>Review and update the tracking of the project's schedule and costs.</p> <p>Document the status of long-lead and other required equipment.</p>	<p>PTN timeline is outdated but remains (officially) unchanged from a year ago -- Unit 6 finishing in '21, Unit 7 in '22. Start-up a year later for each.</p> <p>Project cost range is lower (marginally) than a year ago. Range is 12.62B to 18.42B.</p> <p>Long lead forging agreement (Westinghouse) revised, with current terms and conditions. Expires in Oct2016.</p>	<p>If FPL cancels or forfeits the long lead reservation manufacturing slot, part or all of its reservation fee may be lost.</p> <p>Project cost estimate likely to increase due to expected schedule shift; extent cannot be determined before FPL produces new project schedule later in 2014.</p>



**Performance Analysis Section  
2014 Work Plan  
Florida Power & Light Company (FPL)  
New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
What is the current status of required regulatory approvals?	Update the status of any federal and state license approvals for the project. Determine status of Site Certification and ACOE approvals. Determine effect of NRC delays.	DEIS publication shifted from 4Q14 to Feb15, FEIS to Feb2016, and FSER Mar2017. State, county, and local, licensing continues.	Schedule shift inevitable based on new DEIS, FEIS, and FSER publication schedule and new COLA review schedule (to be issued: 3Q14).
	Determine project plan and time line to complete COLA activities	Application to convert exploratory UIC to an operating well granted (Jan2014). Operational testing successful (Feb2014).	Magnitude of shift is unclear until FPL revises the project schedule.
	Determine project plan and time line to complete COLA activities	Site Certification approved May2014, effectively granting approval for the project and 88 miles of new transmission.	COLA approval now unlikely before Sep2017.
	Document future scheduled dates for regulatory approvals and review any impact on the project.	Miami, S. Miami, Pinecrest, and Coral Gables opposed; FPL settled with Coral Gables.	Most project execution, construction, and spending likely post-2016 or 2017.
	Obtain and document studies performed relating to the company meeting regulatory environmental challenges to regulatory approval. (i.e. cooling water requirements, transmission, site certification, and hydrology)	FDEP likely to issue an Industrial Wastewater permit modification before end-2014	Opposition to SCA approval continues tho' one city settled; a court challenge is likely.
What risk assessments have the company completed for the project?	Document the ongoing risk analyses being performed on the project and identify any changes to the process.	Risk analysis process remains unchanged.	Project internal controls, risk evaluation, and management oversight are adequate and responsive to current project requirements.
	Document any project risk challenges and mitigation strategies implemented since the last review, including lessons learned from other AP1000 COLA efforts.	FPL provided risk assessments and reports on a monthly basis throughout the audit.  Staff reviewed all 2013-2014 (to date) dashboard reports. They provide issue/risk clarity and detail, a probability of occurrence, and analysis of potential impacts, cost, and possible schedule turbulence.	

**Performance Analysis Section  
2014 Work Plan  
Florida Power & Light Company (FPL)  
New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
<b>2.2 Project Management Organization</b>			
What is the current Project Management organization?	Review and update any changes made to the Project Management Organization since the last review.	A Construction Director was added (2013) and filled (2014) with EPU expertise.	Personnel and organization changes are beneficial to the project, leverage existing carryover expertise, and do not appear to impact project operations, organizational structure, or contractor relationships.
	Review and update any changes made to the site Project Management and reporting process since the last review.	<p>There are no personnel changes contemplated for the remainder of 2014.</p> <p>A more direct link to the Chief Nuclear Officer (CNO) was created for Development and New Nuclear Plant (Mar2013). Both organizations report directly to the CNO.</p> <p>The company states that this change does not impact internal project operations, subordinate structures, or existing relationships with contractors and regulators.</p>	
What are the current project management oversight and accountability controls?	Document current processes for senior management oversight responsibilities and reporting.	Risk management includes regular meetings and reports to ID, characterize, evaluate, and isolate or mitigate project risk.	<p>Senior management is engaged, adequately providing higher-level oversight to the project.</p> <p>Current processes and reports are adequate.</p> <p>Internal boards and committees are adequate – engaged and responsive to</p>
	Document current processes for providing informational and status reports on the project.	Weekly small team meetings (e.g. COLA & SCA teams) track activities, facilitate risk ID, discussion, & development of response strategies.	
	Document the current process for reporting project status to internal boards and committees.	Senior management steps in when risks cannot be mitigated by small teams,	

**Performance Analysis Section  
2014 Work Plan  
Florida Power & Light Company (FPL)  
New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
	<p>Document the process for continuing review of project viability and milestone events.</p>	<p>Project schedule, progress, and cost tracked real time, reported in standardized format to monitor vendor performance. Vendors must provide weekly progress reports.</p> <p>Project team meets monthly -- reviews schedule, budget, and issues/risks. ID'd risks are tracked/reviewed until resolved and closed.</p> <p>A Cost Report meeting also provides an opportunity to scrutinize project cost risks.</p> <p>Project management provides regular project updates to FPL executive management.</p> <p>Formal risk reporting focuses on monthly project dashboard and quarterly risk analysis. Monthly dashboards track major risks and inform the quarterly analysis.</p> <p>Quarterly risk analysis is a broader mgmt assessment tool to ID key issues, characterize each, trend them, and track attendant risk. An integral part is determining likelihood of occurrence (lo, med, hi) and potential negatives (lo, med, hi). For each risk a response is designed, mitigation owner</p>	<p>project need.</p> <p>Controls are adequate, sufficiently comprehensive, and responsive to the needs of the project at its current stage.</p> <p>Monthly dashboard and quarterly assessments inform FPL management and executive leadership.</p> <p>As the plan shifts from licensing to construction, staff concludes that an FPL reassessment of content will be required and restructuring may be necessary.</p>



**Performance Analysis Section  
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New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
		<p>assigned, strategies developed to manage risk, and progress tracked until completed.</p> <p>Project leadership may present info to and obtain advice from the FPL Risk Committee. No presentations were made in 2013 or Jan-May2014.</p> <p>Staff reviewed all 2013-14 (to date) dashboards. These provide issue/risk clarity and detail, a probability of occurrence, and analysis of potential impacts, cost, and possible schedule turbulence. Areas assessed:</p> <ul style="list-style-type: none"> <li>NRC Licensing</li> <li>ACOE Permitting</li> <li>SCA</li> <li>UICI</li> <li>MDC Development</li> <li>Project Design</li> <li>Pre-Construction Planning</li> <li>Budget</li> <li>Schedule</li> <li>Procurement</li> <li>Safety</li> </ul>	

**2.3 Project Oversight and Controls**

What are current controls for monitoring the schedule and costs?	Review and update the company's process for monitoring project schedule, risks, and cost updates.	See comments above	See conclusions, above.
	Review and update the company's process for trending and managing scope changes.		Continue to monitor through the remainder of 2014 and in following years.
	Review and update work planning and scheduling changes made since the last review.		

**Performance Analysis Section  
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New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
	Review and update the status of company budget development, evaluation, and revisions for the project since the last review.		
	Review the company's staffing plan and changes made to planned staffing requirements for the project.		

**2.4 Auditing and Quality Assurance**

<p>What are the current auditing and quality assurance controls for the project?</p>	<p>Determine whether any changes to Audit/QA structure have been made since the last review, resulting in fewer audits being performed this year.</p>	<p>An audit of 2012 project expenditures was completed by Experis, under direction / supervision of FPL Internal Audit. FPSC audit staff reviewed the results and report.</p>	
	<p>Review the current internal audit plan and rationale for audits. Review all completed audits since the last review and determine when future audits are planned.</p>	<p>Concentric Energy Advisors reviewed project activities and controls, concluding that FPL appropriately and prudently managed the project in 2013.</p>	<p>FPSC audit staff believes FPL QA oversight is adequate and properly focused for the current project stage &amp; scope.</p>
	<p>Obtain and review any Quality Assurance contractor evaluations completed since the last review.</p>	<p>(2014) Experis audited 2013 project expenditures. FPSC audit staff reviewed the audit the results and report.</p> <p>FPL Quality Assurance (QA) holds vendors accountable for process and product. Oversight of production and controls is done by inspections at the vendors' headquarters and/or manufacturing sites.</p> <p>(2013-14 to date) FPL QA assessors conducted no on-site manufacturer visits.</p> <p>FPL QA assessors conducted spot visits of vendors working</p>	<p>As the project transitions from licensing to construction, project scale and tempo will accelerate. Audit staff believes that on-site manufacturing visits and an FPL reassessment of its QA oversight plan, schedule, and structure will be warranted; restructuring may be necessary to accommodate expansion of project scope and increased project tempo.</p>

**Performance Analysis Section  
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Task	Subtask	Auditor Notes	Conclusions
		at FPL facilities. No areas of non-compliance were noted.	
<b>2.5 Contractor Selection and Management</b>			
What are the current process and controls for soliciting and evaluating contractor bid selection?	Review and document company methods and procedures for issuing a request for proposal.	No changes	Continue to monitor through the remainder of 2014 and in following years.
	Review and update any changes made to company solicitation policies and procedures since the last review.		
	Review and document company methods and procedures for selecting project contractors and vendors.		
	Determine what the company uses to compare and validate contract amounts.		
	Obtain and review sample contract bid evaluation summaries.		
What are the current controls for contractor management?	Update and document a current listing of major contractors and their responsibilities and scope of work.	Project management, technical representatives, and quality assurance personnel monitor vendor performance. FPL believes its "layered approach" to monitoring ensures high quality vendor performance.	FPL invoicing policies and procedures are well understood.
	Document current project management responsibilities for contractor oversight and performance.		
	Document current contractor oversight and performance responsibilities for completing work activities.		
	Document current QA/Audit responsibilities for contractor oversight on the project.	ISC sourcing specialists and contract managers monitor CO's and invoices. Items outside norms are reported. Schedule and cost risks are ID'd, prioritized, & quantified. This information is then used to formulate responsive solutions.	FPL contract and invoicing personnel follow company policies, practices, and procedures.
	Obtain and review company procedures for verifying contractor work performed modifications, scope changes and work authorizations.		FPL believes its suite of systems, policies, procedures, and processes quickly and efficiently ID invoice mistakes
		Processes for contract oversight are adequate.	
			Authorizations and required signatures are present.



**Performance Analysis Section  
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Task	Subtask	Auditor Notes	Conclusions
		<p>or overcharges. Invoicing specialists review all invoices for accuracy and prevailing labor rates. Billed hours are scrutinized and validated (against job categories). Travel expense requests are checked for applicability, authorization, justifications, and linkage to an existing contract.</p> <p>Controls for contract oversight include policies/instructions, authorization requirements, approval methodologies, and invoicing and control procedures.</p> <p>(2013) Revisions to improve accuracy were completed for document retention &amp; processing, review of technical documentation, and monthly cost reporting.</p> <p>One warranty claim was made by FPL against a vendor during this report period, for work on RAI response prep, required calculations, and review of responses.</p> <p>FPL withheld payment, in compliance with project procedures, and negotiated with the vendor. Some portion remains in dispute; negotiations continue.</p>	<p>FPL challenges inaccurate vendor documentation and invoices, payment being withheld until resolution.</p> <p>FPL memos and spreadsheet entries adequately document communications with vendors, illuminating actions of all parties involved.</p>



**Performance Analysis Section**  
**2014 Work Plan**  
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Task	Subtask	Auditor Notes	Conclusions
<p>Are current contractor cost management controls effective?</p> <p>Are there controls to identify and charge back rework or unapproved scope work?</p>	<p>Perform a sample analysis of scope changes, work authorizations and related invoices to determine proper approvals have been obtained and that contractors are not being paid for corrective rework or work outside of approved scope.</p>		

**UPRATE**

**2.1 Project Planning**

<p>What is the current status of the uprate project?</p>	<p>Update and describe project <i>planning decisions</i> made since the last review and the current project schedule and costs.</p> <p>Obtain and document any external reviews performed relative to <i>planning</i> since the last review.</p> <p>Review any detailed internal feasibility studies completed relative to project/<i>planning</i> scope changes.</p>	<p>April 2013, PTN-4 in service to complete its EPU project.</p> <p>Uprates at PTN-3 and St. PSL-1 and PSL-2 were completed in 2012.</p>	<p>The project has been successfully completed and closed out.</p> <p>The EPU project yielded a total increased capacity of 522 MWe, 31 percent higher than the original plan of 399 MWe.</p>
<p>What is the current project schedule?</p>	<p>Review and update the status of project schedules.</p> <p>Review and update the tracking of the project's schedule and costs.</p> <p>Document how and when the company plans to disposition surplus asset.</p> <p>Obtain final project costs (less carrying charges).</p>	<p>FPL 2014 EPU request for recovery will be its last. The company will not submit a request for EPU-related cost recovery in 2015 or beyond.</p> <p>FPL is requesting a truc-up of 2014 revenue requirements of about \$1.1 million</p> <p>Key closeout were conducted: Engineering Change package closeouts; Reduction of EPU project staff; Closeout related purchase orders and contracts; Finalization of engineering documents; Updating Final Safety Analysis Reports and</p>	<p>As of April 2014, the total EPU project cost was \$3.390 billion..... \$3.120 billion in Engineering and Construction costs and \$270 million AFUDC.</p> <p>Total increased capacity of 522 MWe----31 percent higher than the original plan of 399 MWe.</p>

**Performance Analysis Section  
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Task	Subtask	Auditor Notes	Conclusions
		Design; etc.	
What is the current status of required regulatory approvals?	<p>Update the status of any remaining federal and state license approvals for the project.</p> <p>Document and remaining future scheduled dates for regulatory approvals and their impact on the project.</p> <p>Obtain and document studies performed relating to the company meeting regulatory environmental challenges to regulatory approval. (i.e. cooling water requirements, transmission, site certification, etc.)</p>	<p>2013 licencing activities: Turkey Point---Alternative Source Term Licence Amendment.</p> <p>NRC—Review time costs of FPL EUP License Amendment.</p>	
What risk assessments have been completed by the company for the project?	<p>Document the ongoing risk analyses being performed on the project and identify any changes to the process. Determine whether/how Fukushima impact has been incorporated. Determine whether/how the second delamination repair impact has been incorporated.</p> <p>Document any project risk challenges and mitigation strategies implemented since the last review.</p>	<p>Weekly Risk Registers in FPL's Monthly Operating Performance report identified project risks.</p> <p>The Risk Registers identified the probablity of each identified risk occurring and the estimated potential cost impact. mitigation activities and strategies are developed. Satisfied mitigated risks are closed.</p> <p>Several risks associated with project closeout activities such as warranty work, preventive maintenance work orders, and procedure reviews were tracked during project closeout process in 2013.</p>	Risk evaluation was adequately performed.
<b>2.2 Project Management Organization</b>			
What is the current Project Management organization for the uprate project?	Review and update any changes made to the Project Management Organization since the last review. Document rationale for re-assignment of managers and any implications in terms of planning and schedule.	Formal turnover from the EPU organization to the PSL organization was completed	



**Performance Analysis Section  
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Task	Subtask	Auditor Notes	Conclusions
	Review and update any changes made to the site Project Management and reporting process since the last review.	on July 2, 2013.	
	Review and update any changes made to uprate project support organization teams.	Turnover from EPU to the Turkey Point Plant organization was completed on December 31, 2013.  EPU contractors were demobilized and remaining EPU employees were reassigned.	
What are the current project management oversight and accountability controls for the uprate project?	Document current processes for senior management oversight responsibilities and reporting.	In 2013, FPL revised five work instructions to reflect changes to the EPU organization, roles and responsibilities, tracking and processing invoices, and obtaining approval for procurement of materials. Twelve EPU Project Instructions that were no longer needed were deleted.  Throughout 2013 as work was completed ---FPL discontinued Internal reports to the Board of Directors and senior management discussing St. Lucie and Turkey Point EPU project updates and close-out actions.	Project internal controls and management oversight was adequately performed  Found no deficiencies in procedures and controls as the EPU project was closed-out.
	Document current processes for uprate project management, oversight, and accountability.		
	Document current processes for providing informational and status reports on the project.		
	Document the current process for reporting project status to internal boards and committees.		
	Document the process for continuing review of project viability and milestone events.		
<b>2.3 Project Oversight and Controls</b>			
What are current controls for monitoring the uprate schedule and costs?	Review and update the company's process for monitoring project schedule and cost updates.	On March 12, 2013, PSL-1 automatically shut down due to a malfunction of the Main Steam Isolation Valve that was installed during the 2012 uprate. FPL repaired the damaged valves at a cost	There were no EPU related stand downs or work stoppages imposed in 2013.
	Review and update the company's process for trending and managing scope changes.		
	Review and update work planning and scheduling changes made to the project since the last review.		

**Performance Analysis Section  
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New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
	<p>Review and update the status of company budget development, evaluation, and revisions made to the project since the last review.</p> <p>Review the company's staffing plan and whether it has met staffing requirements for the project schedule.</p>	<p>totaling approximately \$2.7 million. The unit was returned to service 21 days later and operated in the uprate condition for 182 days until it was shut down for scheduled refueling in September 2013. PSL-1 had operated at EPU conditions continuously for 230 days after EPU startup in July 2012.</p> <p>In April 2013, PTN-3 was shut down to repair the steam generator feedwater pumps installed as part of the EPU uprate. The unit outage was approximately six days and the cost of the repair was approximately \$1.3 million.</p>	
<b>2.4 Auditing and Quality Assurance</b>			
<p>What are the current auditing and quality assurance controls for the project?</p>	<p>Determine whether any changes to Audit/QA structure have been made since the last review.</p> <p>Review the current internal audit plan and rationale for audits. Review all completed audits.</p> <p>Obtain and review any contractor reviews and evaluations completed since the last review.</p> <p>Obtain and review any QA observations and evaluations completed since the last review.</p>	<p>There were no safety-related quality assurance issues impacting the projects during 2013. Hence, there were no Quality Assurance audits conducted in 2013.</p> <p>Six EPU-related audits were conducted in 2013 and 2014. All conducted by FPL's internal auditing or under the direction of internal auditing.</p>	<p>Internal audits are confidential.</p>
<b>2.5 Contractor Selection and Management</b>			
<p>What are the current process</p>	<p>Determine that this requirement is no longer valid – project is completed.</p>	<p>Not Applicable---EPU project closed out.</p>	



**Performance Analysis Section  
2014 Work Plan  
Florida Power & Light Company (FPL)  
New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
and controls for soliciting and evaluating contractor bid selection?	Review and update any changes made to company solicitation policies and procedures since the last review.		
	Review and document company methods and procedures for selecting project contractors and vendors.		
	Determine whether the company uses industry and other cost comparisons to validate contract amounts.		
	Obtain and review contract bid evaluation summaries 2013 to date.		
What is the current process and controls for single/sole source selection?	Review and document the process for evaluation and justification of sole-source contractors used by the company since the last review.	Not Applicable---EPU project closed out	
	Determine whether the company has revised its sole source procedures and compliance verification efforts.		
	Obtain and review sole and single-source contracts and justifications to determine whether proper justification criteria are included.		
	Determine how the evaluation of a contractor's qualifications is considered in the contract selection decision.		
	Document what levels of management oversight and approval are required for different contract amounts.		
How does the company ensure that its contracts are priced appropriately?	Obtain and review company's written calculations and justification of contracted amounts.	See notes regarding warranty claims and contractor concessions.	
	Review project contracts greater than \$100,000 and document the type of contract, scope of work, contract amount, work completion timeframes, and whether necessary justification is provided.		
	Document what level of management oversight and approval are required for each contract tier.		
What are the current controls for contractor management?	Update and document a current listing of major contractors and their responsibilities and scope of work for the uprate project.	See notes regarding warranty claims and contractor concessions.	
	Document current project management responsibilities for contractor oversight and performance on the uprate project.		
	Document current contractor oversight and performance responsibilities of support services, such as purchasing and procurement, after the contractor completes work on the uprate.		

**Performance Analysis Section  
2014 Work Plan  
Florida Power & Light Company (FPL)  
New Construction / EPU**

Task	Subtask	Auditor Notes	Conclusions
What are the current controls for managing contractor costs and substandard performance?	Document current QA/Audit responsibilities for contractor oversight and performance while on the project.	FPL concentrated its efforts on closing all EPU service and material contracts.  Ten warranty claims settled in 2013---- Eight settled by vendors returning to perform appropriate repairs with no payment to FPL. Two others resolved by vendors paying FPL approximately \$83,000 dollars.  FPL realized total cost savings of approximately \$15.6 million in 2013 through contractor concessions from	All warranty claims have been resolved. The company recovered approximately \$1.5 million.
	Obtain and review company procedures for verifying contractor work performed modifications, scope changes and work authorizations.		
	Review and document contract structure and provisions to protect the company from substandard contractor performance.		
	Determine whether company performance incentives for meeting or exceeding contract provisions have changed since the last review.		
	Determine whether the company has paid incentives for meeting or exceeding contract provisions and how the company has benefitted from contract incentives.		
	Determine whether the company policy for completing vendor performance evaluations after major projects has changed since the last review and document any changes.		
	Determine how the company has changed its contract structure and provisions since the last review to further prevent contractor overruns and substandard performance.		
	Determine whether the company includes risk sharing within contracts, and how effective risk sharing has been to help manage contractor costs and overruns on the uprate project.		
	Determine how the company evaluates contractor costs before/after the project work is completed.		
Determine whether current contractor cost management controls are effective	Perform a sample analysis of scope changes, work authorizations and related invoices to determine proper approvals have been obtained and that contractor is not being paid for corrective rework or work outside of approved scope.	Not applicable –EPU project closed out.	



## ***6. Document Requests***

**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-1 EPU DATE OF REQUEST: November 22, 2013

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: January 17, 2014

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

**NOTE:**

- 1) Questions on this Document Request (DR) pertain to the EPU (uprate) project.
- 2) Please provide all responses on two (2) EPU-only CDs (an original and a copy).
- 3) Please provide the CDs (1-thru-59) returned to FPL at the conclusion of the last NCRC audit.

- EPU DR1.1 a) Please describe the status of close-out activities as of December 31, 2013.
- b) Please provide a copy of the EPU project close-out plan. Describe/discuss the cause and purpose of any revisions made to the original plan and remaining tasks
- c) Identify any delays to the original schedule or plan for completion of uprates or close-out activities during January-December 2013. Provide a description and explain additional costs; include total days and dollars associated with each delay.
- EPU DR1.2 a) Please summarize the uprate work completed and uprate milestones achieved for PSL 1 & 2 uprates from January-December 2013.
- b) Please summarize close-out procedures and close-out milestones achieved for PSL 1 & 2 uprates from January-December 2013.
- EPU DR1.3 a) Please summarize the uprate work completed and uprate milestones achieved for PTN 3 & 4 from January-December 2013.
- b) Please summarize close-out procedures and close-out milestones achieved for PTN 3 & 4 uprates from January-December 2013.
- EPU DR1.4 Please describe any issues increasing anticipated and/or budgeted EPU project close-out costs from January-December 2013.

- EPU DR1.5 Describe any EPU project-related work activities which will not be completed during 2013 and are expected to be completed during 2014.
- EPU DR1.6 Were there any work stoppages or outages in 2013 associated with the EPU project? Please explain the circumstances of each, length of delay, resolution, attendant costs, and whether the vendor or FPL incurred the additional costs.
- EPU DR1.7 At the conclusion of close-out, what is the total EPU project cost?
- EPU DR1.8 a) What is the cumulative project cost (excluding carrying costs) of the uprate for PSL 1?  
b) What is the cumulative project cost (excluding carrying costs) of the uprate for PSL 2?
- EPU DR1.9 a) What is the cumulative project cost (excluding carrying costs) of the uprate for PTN 3?  
b) What is the cumulative cost of the uprate for PTN 4?
- EPU DR1.10 Does FPL intend to file a 2014 NCRC recovery request for uprate and close-out costs incurred January-December 2013?
- EPU DR1.11 Please describe any new NRC or other regulatory initiatives from January-December 2013 that impact EPU. For each issue identified, please provide the current status and timeline for completion.
- EPU DR1.12 Please provide a written summary of any uprate close-out risks identified and mitigation actions taken to address each, during the period January-December 2013.
- EPU DR1.13 List, describe, and provide the amount of any settlement(s) for damages and/or additional costs associated with stand downs, work stoppages, or contract issues from January-December 2013. Provide the amount of each settlement.
- EPU DR1.14 a) List and describe actions (holds, delays, stops, etc.) recommended or undertaken by FPL on contractors from January-December 2013. Describe the event, action taken, date action was taken, and whether the contractor was removed or allowed to continue work.  
b) List, describe, and provide the amount of any settlement(s) associated with warranty claims from January-December 2013. Provide the amount of each settlement.  
c) Please list and describe any contractor concessions or refunds/repayments which reduced EPU project cost during the period January-December 2013.
- EPU DR1.15 a) Please list any management personnel changes during the period January-December 2013  
b) Please list and describe any management changes anticipated in 2014  
c) Provide FPL planned vs. actual project staffing for the period January-December 2013.
- EPU DR1.16 Were any project management policies and procedures created, revised, or deleted January 1, 2013 through the completion of close-out? Please list each, the action taken, and provide a copy of those items created or revised.



- EPU DR1.17 Identify any new uprate project controls introduced January through December 2013.
- EPU DR1.18 Provide all reports discussing St. Lucie and Turkey Point EPU project updates and close-out actions with the Board of Directors, FPL senior management, or project management, including but not limited to briefings, minutes, recommendations, findings, handouts, and Power Point slides for the period January-December 2013.
- EPU DR1.19 Please explain whether the below listed EPU management reports are still in use. If in effect, please provide copies of all reports for the period January-December 2013.
- a. Monthly Operating Report
  - b. Executive Steering Committee reports
  - c. Monthly Project Risk Matrix
  - d. Monthly Risk Mitigation Plan Review
  - e. Key Supplier Meetings
  - f. Bi-Weekly Updates (CNO Updates)
  - g. Project and Individual Unit Cost Data (Monthly Cost Review Reports)
  - h. Weekly Contract Compliance Matrix
- EPU DR1.20 Provide copies of the Key Performance Indicators report for January through December 2013.
- EPU DR1.21 Provide a recap of schedule and cost variances for the St. Lucie uprate project from January through December 2013.
- EPU DR1.22 Provide a recap of schedule and cost variances for the Turkey Point uprate project from January through December 2013.
- EPU DR1.23
- a) Please list surplus/disposable equipment or components over \$10,000, from the St. Lucie 1 & 2 uprates the current estimated value of each asset, and describe the disposition plan(s).
  - b) Please list surplus/disposable equipment or components over \$10,000 from the Turkey Point 3 & 4 uprates, the current estimated value of each asset, and describe the disposition plan(s).
- EPU DR1.24 Please provide a description and status of any EPU service and/or materials contracts or contract addenda for the uprates executed from January through December 2013.
- EPU DR1.25 Provide a copy of any EPU white papers completed from January through December 2013.
- EPU DR1.26 Provide a summary of new contracts in excess of \$250,000 from January through December 2013, in the format used for T-7 table reporting. Please list contracts in order of value from highest to lowest.
- EPU DR1.27 Provide a list of change orders from January through December 2013. List by uprated unit. Provide contract number, CO number, CO initiation date, value, and CO completion date.
- EPU DR1.28 Please provide all single and sole source justifications for all contracts and change orders from January through December 2013.
- EPU DR1.29 Please list any internal and/or external audits completed regarding uprate or close-out activities from January-December 2013. Provide the audit report, recommendations, management responses, and actions taken as a result of these audits.



EPU DR1.30 Provide copies of all EPU contractor evaluations completed during January-December 2013. Describe any corrective actions taken as a result of contractor evaluations.

EPU DR1.31 Describe new project controls implemented by owner organizations as a result of quality assurance reviews, internal auditing, or external audit findings, during January-December 2013. Provide copies of related audits and QA reviews.

EPU DR1.32 a) Please list any Siemens invoices and billing greater than \$1M during January-December 2013. Include work order number, work description, work completion date, invoice number, invoice date, dollars invoiced, date of payment, and amount paid.

b) Please list Siemens discounts, credits, or other reductions in invoicing or billing greater than \$1M during January-December 2013.

c) Please list Siemens accruals greater than \$1M during the period January-December 2013.

EPU DR1.33 List any describe EPU and/or close-out employee concerns and complaints reported from January through December 2013. Please summarize the concern by date received, method of receipt (walk-in, telephonic, under the door, or Red Letter referral), allegation, investigator assigned, investigation results, and disposition.

TO: AUDIT MANAGER David Rich

DATE: 1/16/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_  
1.1, 1.5, 1.6, 1.14, 1.18, 1.19, 1.23, 1.24, 1.26, 1.28, 1.29, 1.30, 1.33, 1.32
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T C Tto  
SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

- EPU DR1.30 Provide copies of all EPU contractor evaluations completed during January-December 2013. Describe any corrective actions taken as a result of contractor evaluations.
- EPU DR1.31 Describe new project controls implemented by owner organizations as a result of quality assurance reviews, internal auditing, or external audit findings, during January-December 2013. Provide copies of related audits and QA reviews.
- EPU DR1.32 a) Please list any Siemens invoices and billing greater than \$1M during January-December 2013. Include work order number, work description, work completion date, invoice number, invoice date, dollars invoiced, date of payment, and amount paid.
- b) Please list Siemens discounts, credits, or other reductions in invoicing or billing greater than \$1M during January-December 2013.
- c) Please list Siemens accruals greater than \$1M during the period January-December 2013.
- EPU DR1.33 List any describe EPU and/or close-out employee concerns and complaints reported from January through December 2013. Please summarize the concern by date received, method of receipt (walk-in, telephonic, under the door, or Red Letter referral), allegation, investigator assigned, investigation results, and disposition.

TO: AUDIT MANAGER David Rich DATE: 2/14/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
1.4-revised, 1.21-revised
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. To

SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-2 EPU

DATE OF REQUEST: April 3, 2014

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: April 3, 2014 (takeaway)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY

X OUTSIDE OF AN INQUIRY

EPU DR-2.1 Provide a copy of the EPU project update presented in PowerPoint format during the FPSC staff visit April 3, 2013.

TO: AUDIT MANAGER David Rich

DATE: April 3, 2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) IS (ARD) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. T. O.

SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst



FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-3 EPU DATE OF REQUEST: May 13, 2014

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: May 23, 2014

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY  
X OUTSIDE OF AN INQUIRY

NOTE: The listed due date is not inflexible and staff would appreciate as expeditious a turnaround as possible.

EPU DR-3.1 Please explain why the PSL-1 Main Steam Isolation Valve outage in March 2013, the TPN-3 reactor coolant pump outage in March 2013, and the TPN-3 steam generator feedwater pump outage in April 2013 are not EPU-related.

EPU DR-3.2 Please explain if the [redacted] contract with [redacted] currently remains open to pursue the \$1.3M outstanding warranty claim for the steam generator feedwater pump failure and the status of the claim/negotiations. If yet to be resolved, please provide an expected date or month of resolution. 1

EPU DR-3.3 For each of the 10 warranty claims settled in 2013 (totaling approximately \$3.2M), please provide the dollar amount FPL originally sought to recover from each claim, the final amount recovered from each claim, and the factual basis for each original claim.

TO: AUDIT MANAGER David Rich

DATE: 5/22/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY 3.2
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) 3.2 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T-C-Tto  
SIGNATURE AND TITLE OF RESPONDENT  
Regulatory Analyst



**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot / Travis Contratto

UTILITY: Florida Power & Light Company David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-1 PTN6&7 DATE OF REQUEST: November 22, 2013

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: January 17, 2014

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY  
X OUTSIDE OF AN INQUIRY

**NOTE:**

- 1) Questions on this Document Request (DR) pertain to the PTN6&7 project.
- 2) Please provide all responses on two (2) CDs (an original and a copy).
- 3) Please provide the CDs (1-thru-59) returned to FPL at the conclusion of the last NCRC audit.

- PTN DR1.1 Regarding Turkey Point 6&7 construction:
- a. Please describe the company outlook, philosophy, and intent to construct.
  - b. What is the current in-service dates for Units 6 and Unit 7?
  - c. What is the current estimated full capital cost of the project?
  - d. Please complete the right-hand column for project schedule dates:

Project Phase		Original	Current
Licensing	Start	2007	2007
	Finish	2012	
Site Preparation	Start	2010	
	Finish	2012	
Generation Plant	Start	2013/2015	
	Finish	2018/20129	
Transmission Facilities	Start	2010	
	Finish	2020	

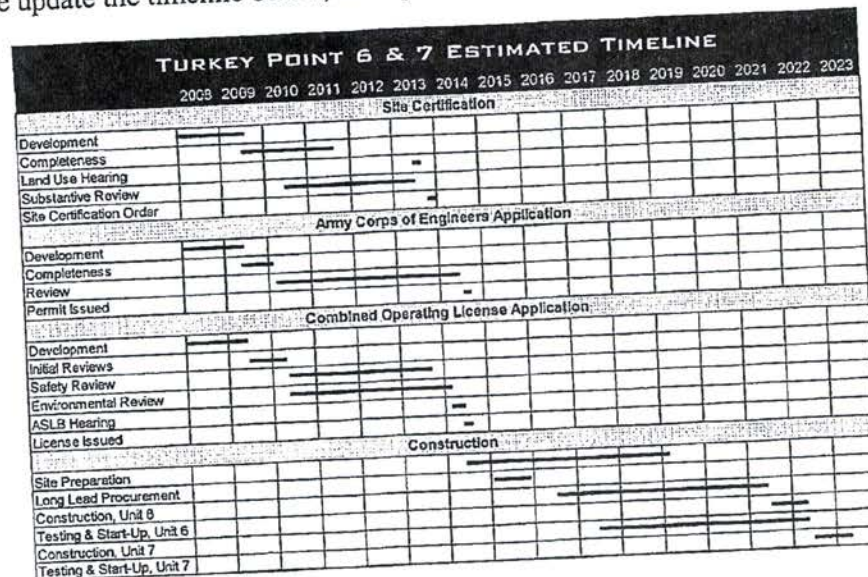
- PTN DR1.2 Regarding project critical path:
- a. Please identify the current project critical path.
  - b. Please describe critical path and timeline impacts from NRC COLA review delays.
  - c. Does the anticipated COLA approval date remain September 2014?
  - d. If the COLA approval date has changed, what is the new date?
  - e. Please explain how adjustment to the COLA approval date will effect project schedule.

PTN DR1.3 Discuss the current status of the NRC COLA review schedule.

PTN DR1.4 Please describe the current status of resolving problems with COLA FSAR 2.5?

PTN DR1.5 Please explain how 2013 NRC changes and delays (e.g. COLA, FSER, FEIS, review schedule, and hearing dates) have impacted or may impact project decision making and critical path.

- PTN DR1.6 Please provide a list and description of NRC requests for additional information (RAI) received since January 1, 2013. Provide the RAI number, date received, NRC due date, and actual or anticipated date of each FPL response.
- PTN DR1.7 Please describe, identify the agency, and provide the date of federal applications, approvals, and/or certifications completed in 2013 and anticipated in 2014 or beyond.
- PTN DR1.8 Please describe, identify the agency, and provide the date of state applications, approvals, and/or certifications completed in 2013 and anticipated in 2014 or beyond.
- PTN DR1.9 Please describe, identify the agency, and provide the date of county/municipal applications, approvals, and/or certifications completed in 2013 and anticipated in 2014 or beyond.
- PTN DR1.10 From January 1, 2013 to date, please describe new or additional NRC initiatives resulting from the 2011 Fukushima incident and their impacts to Turkey Point 6&7 project regulatory, safety, inspection, or reporting requirements.
- PTN DR1.11 Please describe how FPL intends to satisfy the requirements of 366.93(3)(f)3 F.S. "...that it has committed sufficient, meaningful, and available resources to enable the project to be completed and that its intent is realistic and practical."
- PTN DR1.12 Please provide a timeline for:
  - 2013 project milestones
  - Anticipated project milestone dates, 2014
  - Anticipated project milestone dates 2015 through project completion.
- PTN DR1.13 Please update the timeline below, as required, adding identified float as a separate color:



- PTN DR1.14 For Turkey Point 6&7 project construction, please indicate:
  - Whether FPL has decided to pursue an EPC or an EP&C contract.
  - What considerations will FPL use to determine which type of contract to sign?
  - What is the timetable for making a decision between EPC or EP&C?
  - If and how FPL identified possible or preferred candidates for an EPC or EP&C.
  - Whether and when negotiations will begin with possible EPC or EP&C contractors.
  - What is the target month/year to sign a project construction contract(s)?
- PTN DR1.15 Please recap project work completed, ongoing, or anticipated since May 2013.



- PTN DR1.16 Please list and provide a description and date for each project milestones achieved in 2013.
- PTN DR1.17 Please list, describe, and provide a target date for any project milestones anticipated in 2014.
- PTN DR1.18 Please provide a copy of all Turkey Point 6&7 white papers from January 1, 2013 to date. Provide future white papers, until May 30, 2014, as an addendum to this request.
- PTN DR1.19 For cooling water, please describe:
- a. Current status
  - b. Unresolved issues
  - c. Milestones achieved in 2013, with dates
  - d. Milestones anticipated in 2014, with target dates
  - e. Contracts
- PTN DR1.20 For transmission, please describe:
- a. Current status
  - b. Unresolved issues
  - c. Milestones achieved in 2013, with dates
  - d. Milestones anticipated in 2014, with target dates
  - e. Contracts
- PTN DR1.21 Regarding benchmarking of domestic new nuclear construction programs:
- a. Identify the project(s) FPL benchmarked in 2013.
  - b. Identify the project(s) FPL plans to benchmark in 2014.
  - c. Provide any FPL reports, studies, briefing slides or lessons learned reports.
- PTN DR1.22 Regarding benchmarking of foreign new nuclear construction programs:
- a. Identify the project(s) FPL benchmarked in 2013.
  - b. Identify the project(s) FPL plans to benchmark in 2014.
  - c. Provide any FPL reports, studies, briefing slides or lessons learned reports.
- PTN DR1.23 Please list all risk assessment or mitigation meetings or reviews and dates, May 2013 to date. Provide meeting slides, recaps, reports or minutes. Through May 2014, please provide slides, recaps, reports or minutes for each future meeting as a supplement to this request.
- PTN DR1.24 For project management policies, procedures, and controls, please:
- a. List those created in 2013.
  - b. List those revised in 2013 or which are currently under revision.
  - c. List those deleted in 2013.
  - d. List those scheduled for revision in 2014.
- PTN DR1.25 For project staffing, please:
- a. Describe organization changes made or anticipated from January 2013 to May 2014.
  - b. Provide a by-name organization chart depicting direct and indirect reporting linkages.
- PTN DR1.26 Please provide project management reports/status updates from May 2013 to date, to include reports issued by and for senior and executive management. Topics would include, but not be limited to briefings, minutes, findings, handouts, PowerPoint slides, and reports. Going forward, until the completion of the current review, please update this list no later than the 15<sup>th</sup> day of each month (or the next business day if a weekend).

- PTN DR1.27 Please provide the Key Performance Indicators used by FPL management to monitor the status of Turkey Point 6&7 projects and sub-projects. Please provide the 2013 monthly results for each indicator. Going forward, until the completion of the current NCRC review, please update this list no later than the 15<sup>th</sup> day of each month (or the next business day if a weekend).
- PTN DR1.28 For future power purchases or joint ownership:
- Please describe actions since May 2013 seeking future power purchasers or joint owners.
  - Please list meetings held in 2013. Provide slides, notes, handouts, minutes, or reports
  - Please provide a list of meetings scheduled for 2014.
- PTN DR1.29 Please describe any changes to the prior FPL view on DOE Loan Guarantee program participation. Describe 2014 anticipated actions or initiatives.
- PTN DR1.30 Please describe any revisions made during 2013 to contractor selection and management policies or procedures.
- PTN DR1.31 Describe any revisions to project FPL project contractor oversight or management policies and procedures during 2013.
- PTN DR1.32 For the long lead forging agreement:
- What is the current status, terms, and expiration date?
  - Are negotiations ongoing to alter status, terms, or expiration date?
  - Provide the anticipated revision completion date and new expiration date.
  - What is the latest date forging must begin in order to meet current project in-service dates?
- PTN DR1.33 Please provide a list of all existing (open) project contracts valued \$250,000 or more. Provide contractor name, description of the contract or service provided, current estimated value upon completion, and type (competitive bid, single/sole source, or predetermined source; provide copies of any justifications).
- PTN DR1.34 Please provide a list of new contracts of \$100,000 or more executed from May through December 2013 with contractor name, contract or service description, length of contract, value, methodology (e.g. T&M, fixed price, fixed w/incentives), dollars spent to date, and provide single or sole source justifications.
- PTN DR1.35 Please provide a list of new contracts of \$100,000 or more anticipated from January to May 2014 with contractor name, contract or service description, length of contract, value, methodology (e.g. T&M, fixed price, fixed w/incentives), dollars spent to date, and provide single or sole source justifications.
- PTN DR1.36 Please provide a description and status of all contract change orders (CO) valued at \$100,000 or more from May through December 2013. Provide contractor name, contract number, date, and change(s) to the contract terms or value.
- PTN DR1.37 Please provide a description and status of all contract change orders valued at \$100,000 or more anticipated January to May 2014. Provide contractor name, contract number, date, and change(s) to the contract terms or value.
- PTN DR1.38 Please list warranty claims against contractors from May 2013 to date identifying the contractor, contract number, disputed amount, date of initiation, and the date (or anticipated date) of resolution. Ongoing, report any additional warranty claims using the same criteria from the date of FPL's response to May 31, 2014.



- PTN DR1.39 Please list all on-site manufacturer visits by FPL QA from May through December 2013.
- PTN DR1.40 Please list all QA on-site manufacturer visits planned from January to May 2014.
- PTN DR1.41 Please list internal and external audits completed May-December 2013; provide audit reports.
- PTN DR1.42 Please provide a list of ongoing internal and external audits to be completed January-May 2014; provide audit reports when completed.
- PTN DR1.43 Please list internal and external audits schedule to begin January-May 2014; provide target completion dates.
- PTN DR1.44 Please describe any changes in project management policies, practices, procedures, reporting or controls implemented as a result of QA reviews or internal/external audit findings.
- PTN DR1.45 Please describe any changes made May-December 2013 to ECP.
- PTN DR1.46 Please describe any ECP changes anticipated January-May 2014.
- PTN DR1.47 Please list project ECP allegations/complaints received since May 2013. Provide date received, method (walk-in, telephonic, under the door, or Red Letter), summary of allegation, investigator assigned, investigation results, and disposition. Going forward, provide any new EPU allegations or complaints received.

TO: AUDIT MANAGER \_\_\_\_\_ DATE: \_\_\_\_\_

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

SIGNATURE AND TITLE OF RESPONDENT

**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-2 PTN6&7 DATE OF REQUEST: April 3, 2014

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: April 3, 2014 (takeaway)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY  
X OUTSIDE OF AN INQUIRY

PTN DR-2.1 Provide a copy of the PTN6&7 project update presented in PowerPoint format during the FPSC staff visit April 3, 2013.

TO: AUDIT MANAGER David Rich DATE: April 3, 2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
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\_\_\_\_\_  
SIGNATURE AND TITLE OF RESPONDENT

**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot / Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-3 PTN6&7

DATE OF REQUEST: April 3, 2013

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: April 3, 2014 (takeaway)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:  INCIDENT TO AN INQUIRY  
 OUTSIDE OF AN INQUIRY

**NOTE:**

- 1) The requested document was part of FPL presentation during staff interviews conducted 4/3/14.
- 2) At the conclusion of interviews, the requested document was provided to staff as a takeaway.
- 3) This DR provides documentation of that transfer.

PTN DR-3.1 Provide a copy of the letter dated March 7, 2014 from FPL to the NRC, "Turkey Point 6&7 Review Schedule Information". (Re: Dkt. Nos. 52-040 and 52-041; L-2014-074, pgs. 1-3)

TO: AUDIT MANAGER \_\_\_\_\_

DATE: \_\_\_\_\_

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
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- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

\_\_\_\_\_  
SIGNATURE AND TITLE OF RESPONDENT



**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot / Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-4 PTN6&7      DATE OF REQUEST: April 25, 2013

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: May 9, 2014 (earlier if possible)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:           INCIDENT TO AN INQUIRY

  X   OUTSIDE OF AN INQUIRY

**NOTE:**

- 1) Questions on this Document Request (DR) pertain to the PTN6&7 project.
- 2) Please provide all responses on two (2) CDs (an original and a copy).
- 3) Please complete and sign the Notice of Intent located at the bottom of this DR.

PTN DR-4.1 Please provide a copy of any recent (April 2014) NRC correspondence identifying revisions to the expected receipt dates for the DEIS, FEIS, and FSER.

PTN DR-4.2 Provide describe how the revisions to DEIS, FEIS, and FSER dates will impact the project schedule and expected construction completion and COD dates.

PTN DR-4.3 Please provide a copy of the revised longrange forging agreement signed between FPL and Westinghouse that extended the agreement to October 2016.

TO: AUDIT MANAGER \_\_\_\_\_

DATE: \_\_\_\_\_

THE REQUESTED RECORD OR DOCUMENTATION:

(1)  HAS BEEN PROVIDED TODAY

(2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_

(3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.

(4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

\_\_\_\_\_  
SIGNATURE AND TITLE OF RESPONDENT



EPU DR1.30 Provide copies of all EPU contractor evaluations completed during January-December 2013. Describe any corrective actions taken as a result of contractor evaluations.

EPU DR1.31 Describe new project controls implemented by owner organizations as a result of quality assurance reviews, internal auditing, or external audit findings, during January-December 2013. Provide copies of related audits and QA reviews.

EPU DR1.32 a) Please list any Siemens invoices and billing greater than \$1M during January-December 2013. Include work order number, work description, work completion date, invoice number, invoice date, dollars invoiced, date of payment, and amount paid.

b) Please list Siemens discounts, credits, or other reductions in invoicing or billing greater than \$1M during January-December 2013.

c) Please list Siemens accruals greater than \$1M during the period January-December 2013.

EPU DR1.33 List any describe EPU and/or close-out employee concerns and complaints reported from January through December 2013. Please summarize the concern by date received, method of receipt (walk-in, telephonic, under the door, or Red Letter referral), allegation, investigator assigned, investigation results, and disposition.

TO: AUDIT MANAGER

David Rich

DATE:

1/16/2014

THE REQUESTED RECORD OR DOCUMENTATION:

(1)  HAS BEEN PROVIDED TODAY

(2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_  
1.1, 1.5, 1.6, 1.14, 1.18, 1.19, 1.23, 1.24, 1.26, 1.28, 1.29, 1.30, 1.33, 1.32

(3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS ARE PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.

(4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T C Ho  
SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

- EPU DR1.30 Provide copies of all EPU contractor evaluations completed during January-December 2013. Describe any corrective actions taken as a result of contractor evaluations.
- EPU DR1.31 Describe new project controls implemented by owner organizations as a result of quality assurance reviews, internal auditing, or external audit findings, during January-December 2013. Provide copies of related audits and QA reviews.
- EPU DR1.32 a) Please list any Siemens invoices and billing greater than \$1M during January-December 2013. Include work order number, work description, work completion date, invoice number, invoice date, dollars invoiced, date of payment, and amount paid.
- b) Please list Siemens discounts, credits, or other reductions in invoicing or billing greater than \$1M during January-December 2013.
- c) Please list Siemens accruals greater than \$1M during the period January-December 2013.
- EPU DR1.33 List any describe EPU and/or close-out employee concerns and complaints reported from January through December 2013. Please summarize the concern by date received, method of receipt (walk-in, telephonic, under the door, or Red Letter referral), allegation, investigator assigned, investigation results, and disposition.

TO: AUDIT MANAGER David Rich

DATE: 2/14/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
1.4-revised, 1.21-revised
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. Tto

SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-2 EPU

DATE OF REQUEST: April 3, 2014

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: April 3, 2014 (takeaway)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY  
X OUTSIDE OF AN INQUIRY

EPU DR-2.1 Provide a copy of the EPU project update presented in PowerPoint format during the FPSC staff visit April 3, 2013.

\_\_\_\_\_

TO: AUDIT MANAGER David Rich

DATE: April 3, 2014

THE REQUESTED RECORD OR DOCUMENTATION:

(1)  HAS BEEN PROVIDED TODAY

(2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_

(3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.

(4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. T. O.

SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst





FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-3 EPU DATE OF REQUEST: May 13, 2014

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: May 23, 2014

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY

X OUTSIDE OF AN INQUIRY

NOTE: The listed due date is not inflexible and staff would appreciate as expeditious a turnaround as possible.

EPU DR-3.1 Please explain why the PSL-1 Main Steam Isolation Valve outage in March 2013, the TPN-3 reactor coolant pump outage in March 2013, and the TPN-3 steam generator feedwater pump outage in April 2013 are not EPU-related.

EPU DR-3.2 Please explain if the [redacted] contract with [redacted] currently remains open to pursue the \$1.3M outstanding warranty claim for the steam generator feedwater pump failure and the status of the claim/negotiations. If yet to be resolved, please provide an expected date or month of resolution. 1

EPU DR-3.3 For each of the 10 warranty claims settled in 2013 (totaling approximately \$3.2M), please provide the dollar amount FPL originally sought to recover from each claim, the final amount recovered from each claim, and the factual basis for each original claim.

TO: AUDIT MANAGER David Rich

DATE: 5/22/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY 3.2
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEM(S) 3.2 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THIS ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T-C-Tto  
SIGNATURE AND TITLE OF RESPONDENT  
Regulatory Analyst

- PTN DR1.39 Please list all on-site manufacturer visits by FPL QA from May through December 2013.
- PTN DR1.40 Please list all QA on-site manufacturer visits planned from January to May 2014.
- PTN DR1.41 Please list internal and external audits completed May-December 2013; provide audit reports.
- PTN DR1.42 Please provide a list of ongoing internal and external audits to be completed January-May 2014; provide audit reports when completed.
- PTN DR1.43 Please list internal and external audits schedule to begin January-May 2014; provide target completion dates.
- PTN DR1.44 Please describe any changes in project management policies, practices, procedures, reporting or controls implemented as a result of QA reviews or internal/external audit findings.
- PTN DR1.45 Please describe any changes made May-December 2013 to ECP.
- PTN DR1.46 Please describe any ECP changes anticipated January-May 2014.
- PTN DR1.47 Please list project ECP allegations/complaints received since May 2013. Provide date received, method (walk-in, telephonic, under the door, or Red Letter), summary of allegation, investigator assigned, investigation results, and disposition. Going forward, provide any new EPU allegations or complaints received.

AUDIT MANAGER David Rich DATE: 1/16/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_  
1.21, 1.26, 1.32, 1.33, 1.34, 1.36, 1.38, 1.41, 1.42, 1.43
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
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AUDIT MANAGER David Rich

DATE: 2/14/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
 1.19, 1.23, 1.26, 1.27, 1.39, 1.42, 1.47 Feb. Monthly Update
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) 1.26 1.42 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
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Regulatory Analyst



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AUDIT MANAGER David Rich DATE: 3/14/14

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
1.18, 1.23, 1.26, 1.27, 1.38, 1.42, 1.47 March Monthly Update
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) 1.26, 1.42 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
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SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

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AUDIT MANAGER David Rich DATE: 4/14/14

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
*1.18, 1.23, 1.26, 1.27, 1.38, 1.42, 1.47 April Monthly Update*
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) 1.26, 1.42 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
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T. C. Tio  
 SIGNATURE AND TITLE OF RESPONDENT  
*Regulatory Analyst*



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AUDIT MANAGER David Rich DATE: 4/14/14

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
*1.6 revised, 1.15 revised, 1.28 revised*
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
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SIGNATURE AND TITLE OF RESPONDENT  
*Regulatory Analyst*



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- PTN DR1.41 Please list internal and external audits completed May-December 2013; provide audit reports.
- PTN DR1.42 Please provide a list of ongoing internal and external audits to be completed January-May 2014; provide audit reports when completed.
- PTN DR1.43 Please list internal and external audits schedule to begin January-May 2014; provide target completion dates.
- PTN DR1.44 Please describe any changes in project management policies, practices, procedures, reporting or controls implemented as a result of QA reviews or internal/external audit findings.
- PTN DR1.45 Please describe any changes made May-December 2013 to ECP.
- PTN DR1.46 Please describe any ECP changes anticipated January-May 2014.
- PTN DR1.47 Please list project ECP allegations/complaints received since May 2013. Provide date received, method (walk-in, telephonic, under the door, or Red Letter), summary of allegation, investigator assigned, investigation results, and disposition. Going forward, provide any new EPU allegations or complaints received.

AUDIT MANAGER

David Rich

DATE:

5/05/14

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY 1.1 - Revised May updates
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T-C-Tto

SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

- PTN DR1.39 Please list all on-site manufacturer visits by FPL QA from May through December 2013.
- PTN DR1.40 Please list all QA on-site manufacturer visits planned from January to May 2014.
- PTN DR1.41 Please list internal and external audits completed May-December 2013; provide audit reports.
- PTN DR1.42 Please provide a list of ongoing internal and external audits to be completed January-May 2014; provide audit reports when completed.
- PTN DR1.43 Please list internal and external audits schedule to begin January-May 2014; provide target completion dates.
- PTN DR1.44 Please describe any changes in project management policies, practices, procedures, reporting or controls implemented as a result of QA reviews or internal/external audit findings.
- PTN DR1.45 Please describe any changes made May-December 2013 to ECP.
- PTN DR1.46 Please describe any ECP changes anticipated January-May 2014.
- PTN DR1.47 Please list project ECP allegations/complaints received since May 2013. Provide date received, method (walk-in, telephonic, under the door, or Red Letter), summary of allegation, investigator assigned, investigation results, and disposition. Going forward, provide any new EPU allegations or complaints received.

AUDIT MANAGER

David Rich

DATE:

5/14/14

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
*1.18, 1.23, 1.26, 1.27, 1.38, 1.42, 1.47 May Monthly Update*
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) 1.26, 1.42 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. Tto  
SIGNATURE AND TITLE OF RESPONDENT

*Regulatory Analyst*



- PTN DR1.39 Please list all on-site manufacturer visits by FPL QA from May through December 2013.
- PTN DR1.40 Please list all QA on-site manufacturer visits planned from January to May 2014.
- PTN DR1.41 Please list internal and external audits completed May-December 2013; provide audit reports.
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- PTN DR1.45 Please describe any changes made May-December 2013 to ECP.
- PTN DR1.46 Please describe any ECP changes anticipated January-May 2014.
- PTN DR1.47 Please list project ECP allegations/complaints received since May 2013. Provide date received, method (walk-in, telephonic, under the door, or Red Letter), summary of allegation, investigator assigned, investigation results, and disposition. Going forward, provide any new EPU allegations or complaints received.

AUDIT MANAGER David Rich DATE: 6/13/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY  
1.18, 1.23, 1.26, 1.27, 1.38, 1.42, 1.47 June Monthly Update
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) 1.26, 1.42 IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. Ho  
SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst



**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot/Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-2 PTN6&7 DATE OF REQUEST: April 3, 2014

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: April 3, 2014 (takeaway)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY

X OUTSIDE OF AN INQUIRY

PTN DR-2.1 Provide a copy of the PTN6&7 project update presented in PowerPoint format during the FPSC staff visit April 3, 2013.

---

BY: AUDIT MANAGER David Rich

DATE: April 3, 2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. Tho

SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst

FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT

TO: Soria Talbot / Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-3 PTN6&7 DATE OF REQUEST: April 3, 2013

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: April 3, 2014 (takeaway)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY

X OUTSIDE OF AN INQUIRY

NOTE:

- 1) The requested document was part of FPL presentation during staff interviews conducted 4/3/14.
- 2) At the conclusion of interviews, the requested document was provided to staff as a takeaway.
- 3) This DR provides documentation of that transfer.

DR-3.1 Provide a copy of the letter dated March 7, 2014 from FPL to the NRC, "Turkey Point 6&7 Review Schedule Information". (Re: Dkt. Nos. 52-040 and 52-041; L-2014-074, pgs. 1-3)

TO: AUDIT MANAGER David Rich DATE: 4/14/2014

THE REQUESTED RECORD OR DOCUMENTATION:

- (1)  HAS BEEN PROVIDED TODAY provided on 4/13/14
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEMS(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T. C. Tto  
SIGNATURE AND TITLE OF RESPONDENT

Regulatory Analyst



May. 6. 2014 1:08PM

No. 0275 P. 1

**FLORIDA PUBLIC SERVICE COMMISSION  
AUDIT DOCUMENT/RECORD REQUEST  
NOTICE OF INTENT**

TO: Soria Talbot / Travis Contratto

UTILITY: Florida Power & Light Company

David Rich  
AUDIT MANAGER

FROM: FPSC

REQUEST NUMBER: DR-4 PTN6&7 DATE OF REQUEST: April 25, 2013

AUDIT PURPOSE: Project Management Internal Controls

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: May 9, 2014 (earlier if possible)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY

X OUTSIDE OF AN INQUIRY

**NOTE:**

- 1) Questions on this Document Request (DR) pertain to the PTN6&7 project.
- 2) Please provide all responses on two (2) CDs (an original and a copy).
- 3) Please complete and sign the Notice of Intent located at the bottom of this DR.

PTN DR-4.1 Please provide a copy of any recent (April 2014) NRC correspondence identifying revisions to the expected receipt dates for the DEIS, FEIS, and FSR.

PTN DR-4.2 Provide describe how the revisions to DEIS, FEIS, and FSR dates will impact the project schedule and expected construction completion and COI dates.

PTN DR-4.3 Please provide a copy of the revised longrange forging agreement signed between FPL and Westinghouse that extended the agreement to October 2016.

TO: AUDIT MANAGER David Rich DATE: 5/05/14

**THE REQUESTED RECORD OR DOCUMENTATION:**

- (1)  HAS BEEN PROVIDED TODAY
- (2)  CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY \_\_\_\_\_
- (3)  AND IN MY OPINION, ITEM(S) \_\_\_\_\_ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156 F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.
- (4)  THIS ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

T-L-770  
SIGNATURE AND TITLE OF RESPONDENT  
Regulatory Analyst



May. 6. 2014 1:09PM

No. 0275 P. 2

Florida Power & Light Company  
Docket No. 140009-EI  
Staff's Internal Controls Audit PTN  
Request No. 4.1  
Page 1 of 1

**Q.**  
Please provide a copy of any recent (April 2014) NRC correspondence identifying revisions to the expected receipt dates for the DIIS, RHIS, and FSER.

**A.**  
Please see attached correspondence.

April 10, 2014

E. Roy Hawken, Chair  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dr. Michael F. Kennedy  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dr. William C. Burnett  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

In the Matter of  
Florida Power & Light Company  
(Turkey Point Units 6 and 7)  
Docket Nos. 52-040 and 52-041

Dear Administrative Judges:

Pursuant to the Licensing Board's Memorandum and Order dated March 30, 2011, as modified by the Licensing Board's Notice dated September 12, 2012, the Staff is providing the Licensing Board and the parties an index identifying additions to the Hearing File required to be disclosed by the Staff pursuant to 10 C.F.R. § 2.336(d). The index contains the ADAMS accession number, date, and title of each listed document so as to make each document readily retrievable from the agency's website, [www.nrc.gov](http://www.nrc.gov), using the ADAMS "Find" function. Additionally, the Staff will add the documents identified in the index to the agency's Electronic Hearing Docket ("EHD") associated with this proceeding entitled "Turkey Point Hearing File." Also attached, as required by 10 C.F.R. § 2.336(c), is the Affidavit of Manny Comar.

In accordance with the Licensing Board's March 30, 2011, Memorandum and Order, relieving all parties from the obligation of producing privilege logs, as otherwise required by 10 C.F.R. §§ 2.336(a)(3) and 2.336(b)(5), the Staff is not now producing privilege logs. In accordance with the March 30, 2011, Order, however, the Staff is required to produce a log of documents withheld as containing proprietary information. In preparing the enclosed Hearing File Index update, the Staff identified no documents for inclusion on the log of documents withheld as containing proprietary information. Accordingly, no privilege log is attached. As directed by the Licensing Board, the Staff is preserving and maintaining all privileged documents during the pendency of this proceeding.

- 2 -

In accordance with the Licensing Board's March 5, 2014, Order, the Staff hereby provides best estimate schedules for issuing its review documents prepared in connection with the Application, namely, the final Safety Evaluation Report ("SER") and final Environmental Impact Statement ("EIS"). The Staff notified the Applicant before establishing these schedules. In regard to the EIS, the NRC Staff estimates that it will provide a draft EIS to the Environmental Protection Agency ("EPA") in February 2015, and EPA will publish a Notice of Availability of the draft EIS for public comment approximately one week after the Staff issues it. Further, the Staff estimates that it will issue a final EIS in February of 2016. In regard to the SER, the Staff currently estimates that it will issue the final SER in March 2017. The schedule for issuing the final SER, however, rests on the presumption that FPL will submit high quality, complete information by the end of April 2014 in response to Staff requests for additional information. The Staff intends to reevaluate the estimated schedule for issuing the SER in light of the information FPL submits, and, if necessary, revise the schedule. The Staff will notify the Board regarding the status of the schedule for issuing the final SER upon completion of its evaluation of the FPL information, which the Staff expects in July 2014.

Respectfully submitted,

/Signed (electronically) by/  
Robert M. Weisman  
Counsel for the NRC Staff  
U.S. Nuclear Regulatory Commission  
Mail Stop O-15 D21  
Washington, DC 20555-0001  
(301) 415-1696  
Robert.Weisman@nrc.gov

Enclosures: Attachment 1: Hearing File Index  
Attachment 2: Affidavit of Manny Comar



May. 6. 2014 1:10PM

No. 0275 P. 5

Attachment 1

Turkey Point COL Hearing File and Mandatory Disclosures  
Hearing File Index  
Update 36 – April 10, 2014

	Accession Number	Document Date	Title\Description
36-1	ML14089A224	03/06/2014	Proposed Turkey Point Units 6 and 7, Supplemental Response to NRC Request for Additional Information Letter No. 77 (eRA) 7112) Related to SRP Section 11.03 Gaseous Waste Management Systems.
36-2	ML14070A216	03/07/2014	Turkey Point, Units 6 & 7, Review Schedule Information.
36-3	ML14078A052	03/17/2014	Turkey Point, Units 6 and 7 - Removal of FPL-Owned Fill Source from the Combined License Application Part 3 - Environmental Report.
36-4	ML14080A014	03/21/2014	04/03/2014 Notice of Public Teleconference to Discuss AP1000 Design Center COL Regulatory Issues with the Nuclear Regulatory Commission (NRC).
36-5	ML14072A348	03/26/2014	12/18/2013-Summary of Levy COL Units 1 and 2 Public Meeting - Staff Questions for Design Change.
36-6	ML14083A396	04/02/2014	02/27/2014 - Summary of Public Teleconference for Levy Combined License, Units 1 and 2.

ICDR-4.1 PTN

009337

Attachment 2

April 10, 2014

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

FLORIDA POWER & LIGHT COMPANY

(Turkey Point Units 6 and 7)

)  
)  
)  
)  
)

Docket Nos. 52-040 & 52-041

AFFIDAVIT OF MANNY COMAR CONCERNING  
MANDATORY DISCLOSURE REQUIREMENTS OF 10 C.F.R. §§ 2.338(d) and 2.1203

I, Manny Comar, do hereby state as follows:

1. I am employed as a Senior Project Manager in Licensing Branch 4 of the Division of New Reactor Licensing in the Nuclear Regulatory Commission's ("NRC") Office of New Reactors ("NRO"). I serve as a project manager for the NRC's review of the Combined License Application submitted by the Florida Power & Light Company, at issue in this proceeding.

2. In accordance with the Licensing Board's March 30, 2011, Memorandum and Order, and the Board's September 12, 2012, Notice, I hereby certify that all relevant materials required to be disclosed pursuant to 10 C.F.R. §§ 2.338(d) and 2.1203 in this proceeding have been disclosed and that the disclosures are accurate and complete as of April 2, 2014.

3. I hereby certify under penalty of perjury that the foregoing is true and complete to the best of my knowledge, information, and belief.

Executed in Accord with 10 CFR § 2.304(d)

Manny Comar  
Senior Project Manager, Licensing Branch 4  
Division of New Reactor Licensing, NRO, NRC  
Mail Stop T-6 D-23  
Washington, DC 20555-0001  
(301) 415-3863  
Manny.Comar@nrc.gov

Executed in Rockville, MD  
this 10<sup>th</sup> day of April, 2014

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
FLORIDA POWER & LIGHT COMPANY	)	Docket Nos. 52-040 & 52-041
(Turkey Point Units 6 and 7)	)	

CERTIFICATE OF SERVICE

I hereby certify that the NRC Staff's Hearing File Update 36 has been filed through the E-Filing system this 10<sup>th</sup> day of April, 2014.

/Signed (electronically) by/  
Robert M. Weisman  
Counsel for the NRC Staff  
U.S. Nuclear Regulatory Commission  
Mail Stop O-15 D21  
Washington, DC 20555-0001  
(301) 415-1696  
Robert.Weisman@nrc.gov





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

April 17, 2014

Mr. Mano K. Nazar, Senior Vice President  
and Chief Nuclear Officer  
Florida Power and Light Company  
Mail Stop NNP/JB  
700 Universe Blvd  
Juno Beach, FL 33408-0420

SUBJECT: TURKEY POINT UNITS 6 AND 7 COMBINED LICENSE APPLICATION  
ENVIRONMENTAL REVIEW OF ALTERNATIVE SITES AND SCHEDULE  
UPDATES

Dear Mr. Nazar:

The purpose of this letter is to communicate the U. S. Nuclear Regulatory Commission (NRC) staff and U.S. Army Corps of Engineers (USACE) findings regarding the ongoing environmental review issue concerning the alternative sites. NRC and USACE are cooperating Federal Agencies in the development of the Environmental Impact Statement (EIS) for Turkey Point Units 6 and 7. This letter also provides a revised environmental review schedule for the Florida Power and Light Company (FPL) combined licenses (COL) application for two new nuclear units, Units 6 & 7, at the Turkey Point site.

By letters dated May 4, 2012, and February 28, 2013, the staff outlined the following technical issues regarding alternative sites: 1) water availability concerns for the three inland alternative sites (Glades, Martin, and Okeechobee 2), 2) technical deficiencies within the process used to select the alternative sites, and 3) a discrepancy between information provided to the NRC in connection with the NRC National Environmental Policy Act (NEPA) evaluation and information provided to the USACE in connection with its evaluation regarding the "least environmentally damaging practicable alternative" (LEDPA). As a result, the NRC suspended the review of alternative sites until the NRC staff and USACE were satisfied that the alternative sites in question met all applicable requirements.

Since the February 28, 2013, letter suspending the environmental alternative sites review, FPL has developed an approach to resolve the aforementioned issues and presented that approach as well as supplemental information to the staff of the NRC and USACE during public meetings held on May 22, 2013, and November 13, 2013. After the public meetings, FPL revised its draft responses to NRC and USACE requests for additional information (RAI) (6353 and 6879) on alternative sites, based on the technical discussions at the aforementioned public meetings. After thorough review of the revised responses to the RAIs and supplemental information, the NRC and USACE now agree that FPL has provided sufficient information to allow both agencies to proceed with the NEPA review.

May. 6. 2014 1:11PM

No. 0275 P. 9

M. Nazar

- 2 -

In the November 13, 2013, public meeting, it was agreed that the USACE's LEDPA review would be conducted separately from the NRC staff's NEPA review. This agreement between the two Federal agencies and FPL means that the development of the EIS can proceed. The USACE is separately reviewing FPL's Clean Water Act Section 404(b)(1) alternatives analysis and may require additional or separate technical information to complete that review. The draft EIS will document the status of the USACE's Section 404(b)(1) review. The NRC staff continues to expect FPL to provide copies of any correspondence FPL submits to the USACE on this issue.

Regarding the schedule for completion of the draft EIS, the senior management of the NRC met to discuss allocation of critical skill resources to a growing list of agency high priority activities. The outcome of those discussions was a decision to move critical agency resources from the Office of New Reactors (NRO) to the Office of Nuclear Material Safety and Safeguard Materials to support the completion of high priority Waste Confidence activities. The movement of these NRO resources directly affect the NRC's ability to complete the environmental portion of the Turkey Point COL application. The Turkey Point COL application will be delayed and the environmental review schedule outlined in Enclosure 1 reflects the resource decisions discussed above. If resources needed to complete the staff's development of the draft EIS for the Turkey Point COL application become available or work priorities change, the NRC staff will strive to mitigate the delays assumed in the revised environmental review schedule.

Furthermore, this schedule assumes no new and significant changes or additions to the COL application, the USACE's joint permit application, or documentation that supports the environmental review. New and significant information of this type could affect the staff's conclusions in the draft EIS, and therefore, affect the scheduled completion dates. The staff will re-evaluate this schedule after the time for comment on the draft EIS has expired. At that point, the staff may establish a new milestone for Phase 3 based on the number and complexity of the comments received from other Federal, State, and local agencies; members of the public; and other interested stakeholders.

If you have any questions concerning the environmental review, please contact Ms. Alicia Williamson at 301-415-1878 or [Alicia.Williamson@nrc.gov](mailto:Alicia.Williamson@nrc.gov).

Sincerely,

/s/ Mark Delligatti for/

Frank M. Akstulewicz, Director  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos.: 52-040 and 52-041

Enclosure:  
As stated

cc w/encl: See next page

ICDR- 4.1 PTN

009341

76



M. Nazar

- 2 -

In the November 13, 2013, public meeting, it was agreed that the USACE's LEDPA review would be conducted separately from the NRC staff's NEPA review. This agreement between the two Federal agencies and FPL means that the development of the EIS can proceed. The USACE is separately reviewing FPL's Clean Water Act Section 404(b)(1) alternatives analysis and may require additional or separate technical information to complete that review. The draft EIS will document the status of the USACE's Section 404(b)(1) review. The NRC staff continues to expect FPL to provide copies of any correspondence FPL submits to the USACE on this issue.

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If you have any questions concerning the environmental review, please contact Ms. Alicia Williamson at 301-415-1878 or [Alicia.Williamson@nrc.gov](mailto:Alicia.Williamson@nrc.gov).

Sincerely,  
/s/ Mark Delligatti for/  
Frank M. Akstulewicz, Director  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos.: 52-040 and 52-041

Enclosure:  
As stated

cc w/encl: See next page

ADAMS Accession Number: ML14065A677      NRO-002      \*NLO      \*\*see previous concurrence

OFFICE	NRO/DNRL/EPB:PM	NRO/DNRL/EPB:LA	NRO/DSEA/RENV	NRO/DSEA/RENV:BC
NAME	AWilliamson**	JHennigan (MBrown for)	AKugler**	RWhited (MMasnik for)
DATE	3/07/2014	3/13/14	3/10/14	3/12/2014
OFFICE	OGC*	NRO/DNRL/EPB:BC	NRO/DSEA:D	NRO/DNRL:DD
NAME	RWiseman	JDixon-Herrity	SFlanders	MDelligatti
DATE	3/26/2014	3/26/2014	3/31/2014	4/4/2014
OFFICE	NRO/DNRL:D	NRO		
NAME	FAkstulewicz /MDelligatti for/	GHolahan		
DATE	04/17/2014	4/17/2014		

OFFICIAL RECORD COPY



**U.S. Nuclear Regulatory Commission  
Turkey Point Units 6 and 7 Combined License Application  
Environmental Review Schedule**

Phase 1: Environmental Impact Statement Scoping Summary Report Issued	December 2010 (A)*
Phase 2: Draft Environmental Impact Statement Issued to Environmental Protection Agency <sup>1</sup>	DEIS February 2015 (T)*
Phase 3: Final Environmental Impact Statement Issued to Environmental Protection Agency	FEIS February 2016 (T)*

\*A-Actual, T-Target

Enclosure

<sup>1</sup> The Environmental Protection Agency will publish a Notice of Availability of the draft EIS in the Federal Register approximately one week after the document is issued. This notice begins the 75-day public comment period on the draft EIS.

May. 6. 2014 1:12PM

No. 0275 P. 12

Letter to Mr. Mano K. Nazar from Mr. Frank Akstulewicz dated: \_\_\_\_\_

**SUBJECT:** TURKEY POINT UNITS 6 AND 7 COMBINED LICENSE APPLICATION  
REVIEW OF ALTERNATIVE SITES

**DISTRIBUTION:**

PUBLIC

EPB1 R/F

RidsRgn2MailCenter

FAkstulewicz, NRO

AWilliamson, NRO

SFlanders, NRO

MDelligatti, NRO

RHarper, OGC

LBauer, NRO

TFord, NRO

RidsOgcMailCenter

JDixon-Herrity, NRO

BWiseman, OGC

MComar, NRO

RidsNroDnrl

AKugler, NRO

JMartin, OGC

LBurkhart, NRO

RidsNroDsea

RWhited, NRO

CScott, OGC

[rw.bryce@pnnl.gov](mailto:rw.bryce@pnnl.gov)

[Sandra.Mcinturff@pnnl.gov](mailto:Sandra.Mcinturff@pnnl.gov)

[Bryan.Faehner@nps.gov](mailto:Bryan.Faehner@nps.gov)

[Medan.L.Clouser@usace.army.mil](mailto:Medan.L.Clouser@usace.army.mil)

[Christina.D.Storz@usace.army.mil](mailto:Christina.D.Storz@usace.army.mil)

**Turkey Point Mailing List**  
cc:

County Administrator  
Monroe County  
1100 Simonton Street  
Key West, FL 33040

County Attorney  
Monroe County  
P.O. Box 1026  
Key West, FL 33041-1026

Mr. Rick Button  
U.S. Environmental Protection Agency  
Region 4 - NEPA Program Office  
Forsyth St.  
Atlanta, GA 30303

Ms. Megan Clouser  
Senior Project Manager  
U.S. Corps of Engineers  
Regulatory Division  
9900 SW 107th Ave., Suite 203  
Miami, FL 33176-2785

Mr. Miles Croom  
Assist. RA for Habitat Conservation  
U.S. National Marine Fisheries Services  
Southeast Regional Office  
Sustainable Fisheries Div.  
263 13th Ave. South  
St. Petersburg, FL 33701

Mr. Paul Gagliano  
U.S. Environmental Protection Agency  
Region 4 - NEPA Program Office  
Forsyth St.  
Atlanta, GA 30303

Mr. Mike Halpin, Manager  
Florida Dept. of Environmental Protection  
Siting Coordination Ofc.  
3900 Commonwealth Blvd.  
Tallahassee, FL 32399-3000

Mr. Lee N. Hefty, Assistant Director  
Environmental Resources Management  
Miami-Dade Department of Regulatory  
and Economic Resources  
701 NW 1st Court, 4<sup>th</sup> Floor  
Miami, FL 33136-3902

Mr. David S. Hobbie  
Chief Regulatory Division  
U.S. Corps of Engineers  
Regulatory Division  
701 San Marco Blvd.  
Jacksonville, FL 32207

Mr. Robert Hoffman  
Supervisory Fishery Biologist  
U.S. National Marine Fisheries Services  
Southeast Regional Office  
Protected Resources Division  
263 13th Ave. South  
St. Petersburg, FL 33701

Ms. Pamela Hogue, Manager  
Homestead Branch Library  
700 North Homestead Blvd.  
Homestead, FL 33030-6212

Mayor Carlos A. Jimenez  
Stephen P. Clark Center  
111 N.W. 1st St., 29th Flr.  
Miami, FL 33128

Mr. Dan Kimball, Superintendent  
U.S. National Park Service  
Everglades National Park  
40001 State Rd. 9336  
Homestead, FL 33034-6733

Ms. Yvonne Knowles  
229 No. Krome Ave., Ste. 3  
Homestead, FL 33030



May. 6. 2014 1:13PM

No. 0275 P. 14

Turkey Point Mailing List  
cc:

Mr. Steve Krupa, P.G.,  
Sr. Supervising Hydrogeologist  
South Florida Water Management District  
Hydrogeology Section, Water Supply  
3301 Gun Club Rd. West  
SFWMD - POB 24680 -M.S. 4330  
Palm Beach, FL 33416

Mr. Brian Carlstrom, Superintendent  
U.S. National Park Service  
Biscayne National Park  
9700 SW 328th St.  
Homestead, FL 33033-5634

Ms. Cindy Mulkey, Engineer Specialist  
Florida Dept. of Environmental Protection  
Siting Coordination Ofc.  
3900 Commonwealth Blvd.  
Tallahassee, FL 32399-3000

Ms. Zeldia Ryles, Manager  
South Dade Regional Library  
10750 SW 211th St.  
Miami, FL 33189

Mr. Eric Silva, Assistant Director  
Development Services  
Miami-Dade Department of Regulatory  
and Economic Resources  
111 N.W. 1st St.  
Miami, FL 33128

Mr. Paul Souza, Field Supervisor  
U.S. Interior Fish & Wildlife Services  
South Florida Ecological Services Ofc.  
1339 20th St.  
Vero Beach, FL 32960-3559

Mr. Mark Woerner, Assistant Director  
Miami Dade County Department  
of Regulatory and Economic Resources  
Planning  
111 NW 1<sup>st</sup> Street, 12<sup>th</sup> Floor  
Miami, Florida 33128

Mr. John Williamson, Administrator  
Bureau of Radiation Control  
Florida Department of Health  
2044 All Children's Way  
Orlando, FL 32818

David Enfield, Phd, UM  
8395 SW 73<sup>rd</sup> Ave, #812  
Miami, FL 33143

Tria A. Lawton-Russell  
Assistant City Attorney  
Office of the City Attorney  
444 SW 2<sup>nd</sup> Avenue  
Miami, FL 33130

Mr. John Wrublik  
Fish & Wildlife Biologist  
U.S. Interior Fish & Wildlife Services  
South Florida Ecological Services Office  
1339 20th St.  
Vero Beach, FL 32960-3559

Mr. Kirk C. Zueich, Executive Director  
Florida Keys Aqueduct Authority  
1100 Kennedy Dr.  
Key West, FL 33040

Steve Sullivan  
1520 Royal Palm Square  
Fort Myers, FL 33919-1036

walexander@camacol.org (William Alexander)  
valeriejamor@gmail.com (Valerie Amor)  
Sarah\_bellmund@nps.gov (Sarah Bellmund)  
dcaraza@comcast.net (Devin Caraza)  
Megan.L.Clouser@usace.army.mil (Megan Clouser)  
orlando.cruz@tylin.com (Orland R. Cruz)  
dennisdaley@bellsouth.net (Dennis Daley)  
remonster@gmail.com (Victor del Cid)  
bdiggs@m-dcc.org (Bill Diggs)  
Bryan\_Faehner@nps.gov (Bryan Faehner)  
mfinlan@chamberinaction.com (Mary Finlan)  
Steve.Franzone@fpl.com (Steve Franzone)  
paulgannett@yahoo.com (Paul Gannett)  
paul.gaukler@pillsburylaw.com (Paul Gaukler)  
GrossC@miamidade.gov (Craig Grossenbacher)  
umdave@bellsouth.net (Pave C. Guzman)  
khamilton@sfrpc.com (Karen Hamilton)  
picbywal@atlanticbb.net (Walter Harris)  
albert@smalico.net (Albert Harum-Alvarez)  
HeftyL@miamidade.gov (Lee Hefty)  
chenderson@tylin.com (Colin Henderson)  
ethepburn@gmail.com (Liz Hepburn)  
Fred\_Herling@nps.gov (Fred Herling)  
rholmes@sfwmd.gov (Ruth Holmes)  
richardhorton@bellsouth.net (Richard M. Horton)  
thutton@bellsouth.net (Tom Hutton)  
nijnhj@bellsouth.net (Nelda Jacques)  
allance4cleanfl@aol.com (Bob Krasowski)  
lkrimsky@ufl.edu (Lisa Krinsky)  
nancy88@bellsouth.net (Nancy Lea)  
mayorlemer@gmail.com (Mayor Cindy Lerner)  
rogelito84@comcast.net (Rogelio Madan)  
William.Maher@fpl.com (Bill Maher)  
kmalave@ficrc.org (Kevin Malave)  
mccras@miamidade.gov (Sean McCrackine)  
mcsweeny@bellsouth.net (C. McSweeny)  
amencio@miamigov.com (Alina Mencio)  
hmirable@cityofsouthmiami.net (Hector Mirable, Ph.D.)  
dpmoses@bellsouth.net (Dottie Moses)  
AnneMullins@semtribe.com (Anne Mullins)  
paul@edcsouthdade.com (Paul Neldhart)  
mikenelson@live.com (Mike Nelson)  
billn@fcan.org (Bill Newton)  
Richard.Orther@fpl.com (Rick Orther)

pybas@att.net (Don Pybas)  
thomasrodriguez@gmail.com (Thomas Rodriguez)  
megryan561@gmail.com (Meg Ryan)  
saprodani@gmail.com (Thomas Saporito)  
southfloridawild@yahoo.com (Matthew Schwartz)  
marashl@hotmail.com (Mara Shlackman)  
capstan@bellsouth.net (Stan Smilan)  
ironman54912@yahoo.com (Richard Snelson)  
msoria.vw@gmail.com (Laura J. Soria)  
CTepper@semtibe.com (Craig Tepper)  
dicktowndsend@att.net (Dick Townsend)  
tvageline@cityofsouthmiami.net (Thomas Vageline)  
twalker@fkaa.com (Tom Walker)  
Ben\_West@nps.gov (Ben West)  
grossor@nsu.law.nova.edu (Richard Grosso)  
kpoli006@fiu.edu (Karina Polini)  
bpoli003@fiu.edu (Blanca Polini)  
harlemp@fiu.edu (Peter Harlem)  
denfield@earthlink.net (David Enfield)  
marshmaid@gmail.com (Rhonda Roff)  
bwtamia@bellsouth.net (Barry White)



Florida Power & Light Company  
Docket No. 140009-EI  
Staff's Internal Controls Audit PTN  
Request No. 4.2  
Page 1 of 1

**Q.**

Provide describe how the revisions to DEIS, FEIS, and FSER dates will impact the project schedule and expected construction completion and COD dates.

**A.**

The correspondence providing revisions to interim milestones in the NRC COLA review process confirm FPL's assessment that federal budget and resource constraints experienced by the NRC are having an impact on the pace of the COLA review. These delays in the regulatory review process will impact the licensing timeline and, ultimately, the projected commercial operation dates (CODs) of 2022 for Unit 6 and 2023 for Unit 7.

Using these estimated dates and the experience of earlier COLA review schedules, FPL estimates that the Atomic Safety and Licensing Board would hold a contested hearing in the later part of 2016 and, with completion of the final FSR in March 2017, the NRC would be able to make a decision on the Turkey Point Unit 6 & 7 COL in September 2017. This is a three year shift in the licensing phase when compared to FPL's current project schedule.

An updated overall project schedule, including revised CODs, will be developed following receipt of a revised NRC COLA review schedule confirming the timeline to COI issuance. FPL expects to receive a revised NRC COLA review schedule in 2014. The schedule review will also include other relevant information, such as lessons learned from ongoing U.S. AP1000 construction projects and potential schedule impacts resulting from the recent amendment to the Nuclear Cost Recovery Statute and rule.

May. 6. 2014 1:14PM

No. 0275 P. 18

Florida Power & Light Company  
Docket No. 140009-EI  
Staff's Internal Controls Audit PTN  
Request No. 4.3  
Page 1 of 1

**Q.**  
Please provide a copy of the revised longrange forging agreement signed between FPL and Westinghouse that extended the agreement to October 2016.

**A.**  
Please see attached thirteenth amendment to the Reservation Agreement between Westinghouse Electric Company and Florida Power & Light Company.

**THIRTEENTH AMENDMENT TO RESERVATION AGREEMENT BETWEEN WESTINGHOUSE ELECTRIC COMPANY AND FLORIDA POWER & LIGHT COMPANY**

The THIRTEENTH amendment to the Reservation Agreement between Westinghouse Electric Company ("WEC") and Florida Power & Light Company ("FPL") is made and entered into as of April 21, 2014, between FPL and WEC (collectively the "Parties") (the "Thirteenth Amendment"). Capitalized terms used but not specifically defined herein shall have the meanings set forth in the Reservation Agreement.

WHEREAS, the Parties entered into the Reservation Agreement as of May 22, 2008, as amended on November 11, 2009; on April 6, 2010; on March 9, 2011; on May 12, 2011; on July 14, 2011; on September 15, 2011; on November 29, 2011; on February 20, 2012; on May 17, 2012; on September 27, 2012; on March 15, 2013; and on October 23, 2013;

WHEREAS, the Parties have reached an agreement to make changes to the Reservation Agreement;

NOW THEREFORE, in consideration of the mutual covenants contained herein, and for other good and valuable consideration, it is understood and agreed as follows:

**The Reservation Agreement Expiration Date set forth in Paragraph 1 of the Reservation Agreement shall be changed and shall now be October 31, 2016.**

Except as otherwise expressly provided herein, all other terms and conditions of the Reservation Agreement shall remain in full force and effect and unchanged, and are hereby ratified, confirmed, and reaffirmed in all such aspects.

The Thirteenth Amendment may be signed in one or more counterparts, each of which may be deemed an original and all of which together constitute one and the same agreement.

IN WITNESS WHEREOF, the Parties have caused this Thirteenth Amendment to the Reservation Agreement to be signed by their duly authorized officers or representatives, effective as of the date first above written.

FLORIDA POWER & LIGHT COMPANY

WESTINGHOUSE ELECTRIC COMPANY

By: *[Signature]*

By: *[Signature]*

Name: William Males

Name: A. Ron Lewis III

Title: Sr Director - New Nuclear

Title: VP Business Development



## ***7. Document Summaries***

**Office of Auditing and Performance Analysis  
Document Summary and Control Log**

Company: FPL  
Area: Nuclear Controls Review  
Auditor(s): Rich / Hallenstein

Workload Control #: PA-14-01-001  
File Name: i:\Performance Analysis Section\00 PERFORMANCE ANALYSIS AUDITS\Nuclear Controls Review 2014\FPL\3.0 Work Papers\3.3 Document Summaries EPU\3.3.1 DocSumLog EPU DR-1-28.doc

Document #: 1-1  
Date Requested: 11/15/2013  
Date Received: 1/17/2014  
Comments: (i.e., Confidential)

Confidential

**Document Title and Purpose of Review:**  
a) Please describe the status of close-out activities as of December 31, 2013.  
b) Please provide a copy of the EPU project close-out plan. Describe/discuss the cause and purpose of any revisions made to the original plan and remaining tasks  
c) Identify any delays to the original schedule or plan for completion of uprates or close-out activities during January-December 2013. Provide a description and explain additional costs; include total days and dollars associated with each delay.

**Summary of Contents:**  
See Disc 1 for summary of contents

**Conclusions:**  
**Data Request(s) Generated:**  
No. \_\_\_\_\_ Description:  
No. \_\_\_\_\_ Description:

**Follow-up Required:** Need a walk-thru of closout plans for St. Lucie and Turkey Point

Document #: 1-2  
Date Requested: 11/15/2013  
Date Received: 1/17/2014  
Comments: (i.e., Confidential)

**Document Title and Purpose of Review:**  
a) Summarize the uprate completed and uprate milestones achieved for PSL 1 and 2 uprates from January-December 2013.  
b) Summarize close-out procedures and close-out milestones achieved for PSL 1&2 uprates from January-December 2013.

**Summary of Contents:**  
a) Both St. Lucie nuclear units were uprated in 2012. In 2013, uprate implementation work included modifying the spent fuel handling machines to accommodate moving fuel in the spent fuel pools with the new Metamic Inserts required for EPU fuel. St. Lucie Unit 1 operated at EPU conditions in 2013 and the unit was taken offline in September 2013 for a planned refueling outage. During this outage, several EPU modifications were enhanced to improve some operational features. These EPU modifications included: Heater Drain, MSR, FWH, Digital Level Controls; Main Feedwater Pump Replacement & Spare; DEH Control System Upgrade; and Main Steam Isolation Valve Modifications. These modifications were completed and St. Lucie Unit 1 returned to service on November 9, 2013. In addition, the following EPU modifications were completed and closed in 2013: TCW Thermal Relief Valve Pressure Increase and TCW Standby Pump Auto-Start Modification.  
b) The closeout process includes numerous activities required to closeout the project after the EPU outages are completed and the units begin operation at the uprated power levels. These activities include: closing engineering change packages; updating Final Safety Analysis Reports; updating Design Basis Documents; updating engineering calculations; evaluating preventive maintenance requirements; developing model work orders; revising procedures; identifying and purchasing spare parts; completing and testing



	<p>requirements; developing model work orders; revising procedures; identifying and purchasing spare parts; completing and testing control room simulator changes; updating training materials; closing EPU contracts; completing EPU action requests and condition reports in the formal Corrective Action Program; restoring site facilities; demobilizing contractors; disposing of salvageable assets; and destaffing the EPU project teams. Formal turnover from the EPU organization to the St. Lucie Plant organization was completed on July 2, 2013 – EPU contractors were demobilized and the remaining EPU employees were reassigned. In 2013, FPL closed 72 St. Lucie EPU Engineering Changes, completed 140 St. Lucie EPU procedure changes, and closed 67 large St. Lucie EPU contracts.</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b>  *Were the EPU modifications in 9/13 to PS1 anticipated events or required unplanned work?  *Were there additional project costs?  *If formal turnover time of EPU organization was done in July 2013, why EPU modifications made in September 2013?</p>
<p><b>Document #: 1-3</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b>  a) Please summarize the uprate work completed and uprate milestones achieved for PTN 3 &amp; 4 from January-December 2013.  b) Please summarize close-out procedures and close-out milestones achieved for PTN 3 &amp; 4 uprates from January-December 2013.</p> <p><b>Summary of Contents:</b>  a) The Turkey Point Unit 3 uprate implementation was completed in 2012. The Turkey Point Unit 4 uprate implementation was completed in April 2013. The following are equipment installations or modifications which were completed during the Turkey Point Unit 4 outage which ended in April 2013: Installation of Sodium Tetra-Borate Baskets, Feedwater Heater Drains Digital modifications, Turbine Digital Controls modification, Leading Edge Flow Meter Digital upgrade, Balance of Plant Instrumentation modifications, Setpoint and indication changes, Switchyard modifications, Fast Acting Feedwater Isolation Valves addition, Feedwater Regulating Valves Trim Upgrade modification, Replace (remaining) Heater Drain Valves, Feedwater Heater #5 Drain Piping modification, Main Steam Isolation Valve and Main Steam Control Valve Assemblies replacement, Main Steam Safety Valve Set Point modifications, High Pressure Turbine modification, Main Generator Rotor replacement, Main Generator Hydrogen Coolers replacement, Turbine Electro-Hydraulic Controls replacement, Moisture Separator Reheater replacement, Main Condenser replacement, Condenser Tube Cleaning System replacement, Normal Containment Cooling modifications, Spent Fuel Pool Cooling Heat Exchanger modification, Pressurizer Safety Valve setpoint change, Emergency Containment Filter media removal, Condensate Pump and Motor replacement, Main Feed Pump Rotating Element replacement, Turbine Plant Cooling Water Heat Exchanger replacement, Feedwater Heater (5A/B, 6A/B) replacement, Instrumentation &amp; Control Pressurizer Setpoint / Control / indication changes, Main Steam Pressure Lead/Lag Module Install and Eagle 21 changes, High Pressure Turbine Supply Spill Over Piping replacement, Containment Aluminum reduction, Hot Leg Injection Alternate Flow Path, Plant Documentation Changes resulting from Westinghouse Setpoint and Scaling changes, Main Steam Flow Element replacement, Steam Generator Blowdown Flow Instrumentation modifications, Component Cooling Water Pipe Support modifications, Steam Jet Air Ejector Condenser Tube Bundle replacement, Heater Drain System Pressure re-rate, Control Rod Drive Mechanism Fan Motor and Cooling Coil replacement, Emergency Containment Cooling restore automatic actuation of third Emergency Containment Cooler to reduce Post-accident containment pressure, EPU Piping Vibration modifications, Unit 4 Turbine Building &amp; Feedwater platform structure, Add Valve Operator Extension Hand wheel to Safety Injection Valve 3-867 and 4-867, Unit 4 Umbrella modification – License Amendment Request ICDR 1.3 EPU 001754 documents, and Unit 4 condensate flushing modifications.</p>



	<p>b) The closeout process includes numerous activities required to closeout the project after the EPU outages are completed and the units begin operation at the uprated power levels. These activities include: closing engineering change packages; updating Final Safety Analysis Reports; updating Design Basis Documents; updating engineering calculations; evaluating preventive maintenance requirements; developing model work orders; revising procedures; identifying and purchasing spare parts; completing and testing control room simulator changes; updating training materials; closing EPU contracts; completing EPU action requests and condition reports in the formal Corrective Action Program; restoring site facilities; demobilizing contractors; dispositioning salvageable assets; and destaffing the EPU project teams. Formal turnover from the EPU organization to the Turkey Point Plant organization was completed on December 31, 2013 – the EPU contractors were demobilized and the remaining EPU employees were reassigned. In 2013, 111 EPU Engineering Changes were formally closed, 91 EPU procedure changes were completed, and 112 large contracts were closed.</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 #: 1-4</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Revisions Received: 2/18/14</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> Please describe any issues increasing anticipated and/or budgeted EPU project close-out costs from January-December 2013.</p> <p><b>Summary of Contents:</b> There were no issues encountered with EPU project close-out activities that significantly affected the EPU project costs in 2013. Some 2013 closeout activities cost more than estimated and others cost less than estimated. The EPU project did not separately budget or track closeout costs; however, overall, the EPU costs incurred in 2013 were less than estimated.</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b> Original response said “did not separately budget or track closeout costs” Revised response says “EPU project tracked budgeted and tracked costs”</p>
<p><b>Document #: 1-5</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p> <p><b>Confidential</b></p>	<p><b>Document Title and Purpose of Review:</b> Describe any EPU project-related work activities which will not be completed during 2013 and are expected to be completed during 2014.</p> <p><b>Summary of Contents:</b></p> <p>See Disc 1 for summary of contents</p> <p><b>Conclusions:</b></p> <p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p> <p><b>Follow-up Required:</b>  *Need to discuss closeout activities that were not completed in 2013 and whether they will be requested for recovery in 2014.</p>

	<ul style="list-style-type: none"> <li>*Are these considered to be "normal" closeout items?</li> <li>*Is the seal warranty item holding to next outage? <ul style="list-style-type: none"> <li>*When is next schedule outage?</li> <li>*What is the impact of the leaking seal?</li> <li>*Will replacement of the boot seal also be warranted?</li> <li>*Why weren't warranty items addressed during last outage?</li> </ul> </li> </ul>
<p><b>Document #: 1-6</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p> <p>Confidential</p>	<p><b>Document Title and Purpose of Review:</b> Were there any work stoppages or outages in 2013 associated with the EPU project? Please explain the circumstances of each, length of delay, resolution, attendant costs, and whether the vendor or FPL incurred the additional costs.</p>
	<p><b>Summary of Contents:</b></p> <p>See Disc 1 for summary of contents</p>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b></p> <p>No. ____ Description:</p> <p>No. ____ Description:</p>
	<p><b>Follow-up Required:</b></p> <ul style="list-style-type: none"> <li>*Explain outage and any recovering costs and fuel costs w/20 day replacement costs?</li> <li>*If warranty claim, why is this not EPU related?</li> <li>*Didn't [REDACTED] do some EPU work?</li> <li>*When do you anticipate warranty claim being resolved?</li> <li>*Unscheduled outage PS1? <ul style="list-style-type: none"> <li>*Were there additional costs to the EPU project due to the PS1 outage?</li> </ul> </li> <li>*What were costs for PTN3 shutdown? <ul style="list-style-type: none"> <li>*How do you determine that PSL and PTN are not EPU related?</li> </ul> </li> </ul>
<p><b>Document #: 1-7</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> At the conclusion of close-out, what is the total EPU project cost?</p>
	<p><b>Summary of Contents:</b> At the conclusion of EPU closeout activities on December 31, 2013, the total EPU project cost was \$3,388 million. Total project cost includes capital, recoverable O&amp;M, removal costs, non-incremental costs, carrying charges (jurisdictional, net of participants), AFUDC, interest and net book value of retirements (net of salvage), on a total company basis (net of participants). The amount provided is based on preliminary year-end results and is subject to change. Final project costs will</p>

1



	be supplied in Dkt 140009-EI true-up testimony and exhibits.
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b> Check with May filing for final projected costs.
<b>Document #: 1-8</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> a) What is the cumulative project cost (excluding carrying costs) of the uprate for PSL 1? b) What is the cumulative project cost (excluding carrying costs) of the uprate for PSL 2?
	<b>Summary of Contents:</b> a) The cumulative project cost (excluding carrying costs) of the uprate for PSL 1 is \$631 million. b) The cumulative project cost (excluding carrying costs) of the uprate for PSL 2 is \$490 million. Cumulative project cost includes capital, recoverable O&M, removal costs, non-incremental costs and net book value of retirements (net of salvage), on a total company basis (net of participants). The amount provided is based on preliminary year-end results and is subject to change. Final project costs will be provided in Dkt 140009-EI true-up testimony and exhibits
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b> Check with May filing for final projected costs.
<b>Document #: 1-9</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> a) What is the cumulative project cost (excluding carrying costs) of the uprate for PTN 3? b) What is the cumulative cost of the uprate for PTN 4?
	<b>Summary of Contents:</b> a) The cumulative project cost (excluding carrying costs) of the uprate for PTN 3 is \$1,138 million. b) The cumulative project cost (excluding carrying costs) of the uprate for PTN 4 is \$859 million.  Cumulative project cost includes capital, recoverable O&M, removal costs, non-incremental costs and net book value of retirements (net of salvage), on a total company basis (net of participants). The amount provided is based on preliminary year-end results and is subject to change. Final project costs will be provided in Dkt 140009-EI true-up testimony and exhibits.



	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b> Check with May filing for final projected costs.
<b>Document #: 1-10</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Does FPL intend to file a 2014 NCRC recovery request for uprate and close-out costs incurred January-December 2013?
	<b>Summary of Contents:</b> FPL intends to submit True-up (T) Schedules for 2013 actual costs as part of its 2014 Nuclear Cost Recovery Clause filings.
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<b>Document #: 1-11</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Please describe any new NRC or other regulatory initiatives from January-December 2013 that impact EPU. For each issue identified, please provide the current status and timeline for completion.
	<b>Summary of Contents:</b> In September 2012, FPL submitted Administrative License Amendment Request No. 217 regarding Operating License Conditions and Technical Specifications. This license request was necessary to clean-up, close, and remove license conditions that have been fully satisfied as of the end of the Unit 3 Cycle 26 refueling outage; revise TS 5.5.1 to remove related license conditions; correct several administrative items in the technical specifications; and update the reference to the Physical Security Plan (PSP) to the latest approved revision in the related license conditions. In 2013, FPL supported the NRC's review of this administrative license amendment request No. 217. FPL expects the NRC to approve this license amendment in 2014.
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:

	<p><b>Follow-up Required:</b></p> <p>*What is the Administrative License Amendment?</p> <p>*Is there any potential delay or additional costs to the project if the Administrative License Amendment Request is not approved in 2014?</p> <p>*What is the overall impact of the Amendment Request and did this have any impact on project in 2013?</p>
<p><b>Document #: 1-12</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b></p> <p>Please provide a written summary of any uprate close-out risks identified and mitigation actions taken to address each, during the period January-December 2013.</p>
	<p><b>Summary of Contents:</b></p> <p>During the project closeout process in 2013, FPL identified, tracked, and mitigated several risks associated with project closeout activities. These risks included:</p> <ol style="list-style-type: none"> <li>1. Execution risk associated with EPU SL 1-25 EC implementation – detailed planning and field walkdowns were completed to mitigate execution risk</li> <li>2. Schedule risks associated with St. Lucie procedure reviews, calculation issuance, and Design Basis Document updates that were slightly behind plan – project management attention and additional resources ensured successful completion of these activities.</li> <li>3. Execution risk associated with warranty work to correct Steam Bypass Control System power cable brackets on St. Lucie Units 1 and 2 – proactive oversight by the St. Lucie Maintenance Department resulted in successful completion of the work.</li> <li>4. Schedule risk associated with over 12,000 drawing updates for Turkey Point EPU –detailed vendor oversight resulted in successful completion of the drawing updates.</li> <li>5. Schedule risk associated with Turkey Point closeout activities including model preventive maintenance work orders, procedure revisions, and work order closures –detailed project management and added resources ensured the work was completed as planned.</li> <li>6. Schedule risk associated with St. Lucie closeout activities including containment vacuum analysis, control room humidity study, control room air conditioning software change, and Main Steam Check Valve post EPU inspection for flow corrosion - weekly meetings were held to increase attention on completion of remaining closeout activities.</li> </ol>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b></p> <p>No. _____ Description:</p> <p>No. _____ Description:</p>
	<p><b>Follow-up Required:</b></p>
<p><b>Document #: 1-13</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b> List, describe, and provide the amount of any settlement(s) for damages and/or additional costs associated with stand downs, work stoppages, or contract issues from January-December 2013. Provide the amount of each settlement.</p>



	<p><b>Summary of Contents:</b> As indicated in response to ICDR-1.6, there were no stand downs or work stoppages in 2013; thus, there were no settlements associated with stand downs or work stoppages in 2013. See FPL's response to ICDR-1.14 for settlements associated with contract issues in 2013.</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 #: 1-14</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>  <b>Confidential</b></p>	<p><b>Document Title and Purpose of Review:</b> a) List and describe actions (holds, delays, stops, etc.) recommended or undertaken by FPL on contractors from January-December 2013. Describe the event, action taken, date action was taken, and whether the contractor was removed or allowed to continue work. b) List, describe, and provide the amount of any settlement(s) associated with warranty claims from January-December 2013. Provide the amount of each settlement. c) Please list and describe any contractor concessions or refunds/repayments which reduced EPU project cost during the period January-December 2013.</p>
	<p><b>Summary of Contents:</b>  See Disc 1 for summary of contents</p>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:</p>
	<p><b>Follow-up Required:</b>  *Explain the _____ of _____ with former _____  *Who is new _____ and what are the "additional provisions and requirements reealtlive to the payment of _____ to employees of _____?  *Who are the _____ and what is the _____ to be _____?  *What are the remaining _____ (to whom _____ were made) doing to _____ and _____ FPL for _____    <u>Warranty Claims</u>  1. Did _____ reimburse FPL for any outage delay caused by replacement of seals?  2. Was the 2013 PSL1 refueling outage scheduled or unscheduled for EPU work? When is the PSL2 replacement part work scheduled for 2014?  3. Did _____ install the replacment parts at no costs? Who installed the parts? Did the EPU project incur additional</p>

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	<p>installation costs?</p> <ol style="list-style-type: none"> <li>4. Were any additional costs to the project incurred for the PSL-2 control room project?</li> <li>5. Is the cracked baffle plate warranted for future problems?</li> <li>6. Is the boot seal warranted for further problems by [REDACTED]?</li> <li>7. Does the tube cleanliness work have the potential to extend th PTN3 refueling outage? When is the outage scheduled?</li> <li>8. Does the condenser cleanliness have the potential to extend the PTN4 refueling outage? When is the outage scheduled?</li> <li>9. Is number 9 the same as 8?</li> </ol> <p>c. If the total [REDACTED] concessions in 2013 were \$15.5 million, what are the total concessions for [REDACTED] during the project?</p>
<p><b>Document #: 1-15</b>  <b>Date Requested: 11/15/2014</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b></p> <ol style="list-style-type: none"> <li>a) Please list any management personnel changes during the period January-December 2013</li> <li>b) Please list and describe any management changes anticipated in 2014</li> <li>c) Provide FPL planned vs. actual project staffing for the period January-December 2013.</li> </ol>
	<p><b>Summary of Contents:</b></p> <ol style="list-style-type: none"> <li>a) No significant EPU project management personnel changes were made in 2013 besides the planned destaffing of the project team in accordance with the project staffing plan.</li> <li>b) None</li> <li>c) Attached are the 2013 staffing plans for PSL EPU and PTN EPU.</li> </ol>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b></p> <p>No. _____ Description:</p> <p>No. _____ Description:</p>
	<p><b>Follow-up Required:</b></p>
<p><b>Document #: 1-16</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b></p> <p>Were any project management policies and procedures created, revised, or deleted January 1, 2013 through the completion of close-out? Please list each, the action taken, and provide a copy of those items created or revised.</p>
	<p><b>Summary of Contents:</b></p> <p>The following EPU procedures were revised (attached) or deleted in 2013:</p> <p><b>Revised:</b></p> <p>EPPI-100 R7 Project Instructions - Prep, Rev, Cancel</p>

	<p>EPPI-140 R12 Roles and Responsibilities  EPPI-220 R8 PR Funding Request and SSJ  EPPI-230 R9 EPU Project Invoice Process Instructions  R5 EPU Governance and Oversight Protocol</p> <p><b>Deleted:</b>  Nonbinding Cost Estimate Range 302 Cancelled 10/14/2013  Development, Maintenance, and Update of Schedules 310 Cancelled 11/18/2013  Cost Estimating 320 Cancelled 10/14/2013  EPU Project Risk Management Program 340 Cancelled 10/14/2013  Project Self Assessment 380 Cancelled 8/19/2013  EPU Obsolete and Spare Parts Process Guideline 391 Cancelled 12/2/2013  EPU Project Personnel Training Requirements 520 Cancelled 8/19/2013  EPU Project Qualification Guidelines 560 Cancelled 8/19/2013  EPU Uprate License Amendment Request 610 Cancelled 7/28/2011  Request for Information - St. Lucie and Turkey Point 640 Cancelled 8/19/2013  St. Lucie EPU Project Severe Weather Preparation 810 Cancelled 1/2/2013  Turkey Point EPU Project Severe Weather Preparations 910 Cancelled 12/2/2013</p>
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<p><b>Document #: 1-17</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b>  Identify any new uprate project controls introduced January through December 2013.</p>
	<p><b>Summary of Contents:</b>  The PTN EPU Project Closeout Metric Package was introduced in 2013 to track the remaining activities to complete the project.</p>
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>

<p><b>Document #: 1-18</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p> <p><b>Confidential</b></p>	<p><b>Document Title and Purpose of Review:</b>  Provide all reports discussing St. Lucie and Turkey Point EPU project updates and close-out actions with the Board of Directors, FPL senior management, or project management, including but not limited to briefings, minutes, recommendations, findings, handouts, and Power Point slides for the period January-December 2013.</p>
	<p><b>Summary of Contents:</b>  See Disc 1 for summary of contents</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 #: 1-19</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p> <p><b>Confidential</b></p>	<p><b>Document Title and Purpose of Review:</b>  Please explain whether the below listed EPU management reports are still in use. If in effect, please provide copies of all reports for the period January-December 2013.</p> <ul style="list-style-type: none"> <li>a. Monthly Operating Report</li> <li>b. Executive Steering Committee reports</li> <li>c. Monthly Project Risk Matrix</li> <li>d. Monthly Risk Mitigation Plan Review</li> <li>e. Key Supplier Meetings</li> <li>f. Bi-Weekly Updates (CNO Updates)</li> <li>g. Project and Individual Unit Cost Data (Monthly Cost Review Reports)</li> <li>h. Weekly Contract Compliance Matrix</li> </ul>
	<p><b>Summary of Contents:</b>  See Disc 1 for summary of contents</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 #: 1-20</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b>  Provide copies of the Key Performance Indicators report for January through December 2013.</p>
	<p><b>Summary of Contents:</b></p> <p>St. Lucie EPU:  No St. Lucie EPU Key Performance Indicator reports were issued in 2013.</p> <p>Turkey Point EPU:  Bechtel prepared Earned Value Packages during the Turkey Point Unit 4 outage. Bechtel used Cost Performance Index (CPI) and Schedule Performance Index (SPI) to measure progress and performance versus a budget and schedule. When an index was below 1.0, performance was less than planned and required corrective action. Many factors can affect these performance indicators, such as change in work scope, further engineering analysis, additional regulatory requirements, construction reviews needing additional implementation considerations and estimates based on conceptual design information. These performance indicators are contained in the Earned Value reports dated 1/1/13 through 2/27/13 provided in ICDR-1.18.</p>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b>  <b>No. _____ Description:</b>  <b>No. _____ Description:</b></p>
	<p><b>Follow-up Required:</b></p>
<p><b>Document #: 1-21</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b>  Provide a recap of schedule and cost variances for the St. Lucie uprate project from January through December 2013.</p>
	<p><b>Summary of Contents:</b></p> <p>2013 Schedule Variances:  The St. Lucie EPU project closeout was completed and the project team was dissolved in 2013 as planned. See FPL's response to DR-1.5 for a listing of EPU closeout activities turned over to the plant organization. 2013 Cost Variances: The estimated 2013 St. Lucie EPU cost (excluding AFUDC and carrying charges) was approximately \$14 million and the actual 2013 St. Lucie EPU cost (excluding AFUDC and carrying charges) was approximately \$26 million. Thus, the 2013 St. Lucie EPU cost variance was approximately \$12 million. Project cost includes capital, recoverable O&amp;M, removal costs, non-incremental costs, and net book value of retirements (net of salvage), on a total company basis (net of participants). The amount provided is based on preliminary year-end results and is subject to change. Final project costs will be provided in Dkt 140009-EI true-up testimony and exhibits.</p>
	<p><b>Conclusions:</b></p>

	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<b>Document #: 1-22</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Provide a recap of schedule and cost variances for the Turkey Point uprate project from January through December 2013.
	<b>Summary of Contents:</b> 2013 Schedule Variances: The Turkey Point Unit 4 EPU outage was scheduled to complete 4/12/13 and actually completed 4/17/13. The Turkey Point EPU project closeout was completed and the project team was dissolved in 2013 as planned. See FPL's response to DR-1.5 for a listing of EPU closeout activities turned over to the plant organization for completion. 2013 Cost Variances: The estimated 2013 Turkey Point EPU cost (excluding AFUDC and carrying charges) was approximately \$247 million and the actual 2013 Turkey Point EPU cost (excluding AFUDC and carrying charges) was approximately \$225 million. Thus, the 2013 Turkey Point EPU cost variance was approximately \$22 million. Project cost includes capital, recoverable O&M, removal costs, non-incremental costs, and net book value of retirements (net of salvage). The amount provided is based on preliminary year-end results and is subject to change. Final project costs will be provided in Dkt 140009-EI true-up testimony and exhibits.
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<b>Document #: 1-23</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>  <b>Confidential</b>	<b>Document Title and Purpose of Review:</b>  a) Please list surplus/disposable equipment or components over \$10,000, from the St. Lucie 1 & 2 uprates the current estimated value of each asset, and describe the disposition plan(s). b) Please list surplus/disposable equipment or components over \$10,000 from the Turkey Point 3 & 4 uprates, the current estimated value of each asset, and describe the disposition plan(s).
	<b>Summary of Contents:</b>  See Disc 1 for summary of contents
	<b>Conclusions:</b>

	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>
<b>Document #: 1-24</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>  Confidential	<b>Document Title and Purpose of Review:</b>  Please provide a description and status of any EPU service and/or materials contracts or contract addenda for the uprates executed from January through December 2013.
	<b>Summary of Contents:</b>  See Disc 1 for summary of contents
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b> Determine whether the open contracts are now closed or their purpose for remaining open
<b>Document #: 1-25</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b>  Provide a copy of any EPU white papers completed from January through December 2013
	<b>Summary of Contents:</b>  There were no EPU white papers completed in 2013.
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. _____ Description: No. _____ Description:
	<b>Follow-up Required:</b>



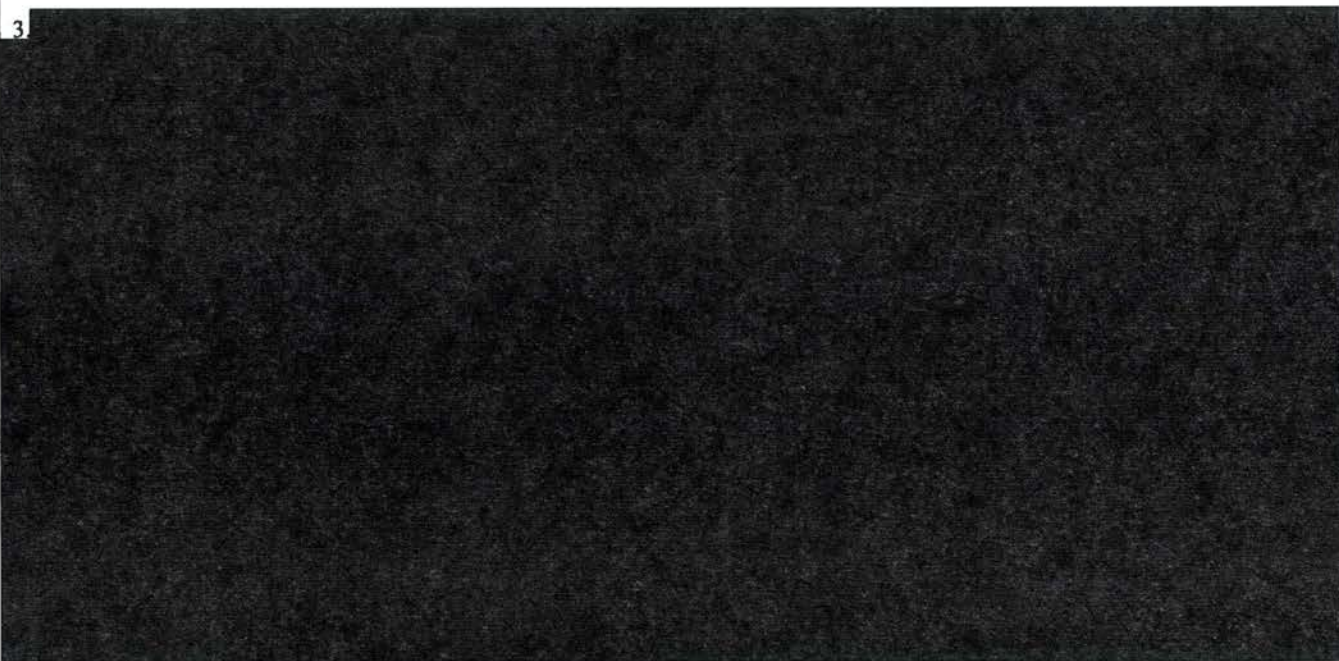
<p><b>Document #: 1-26</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p> <p>Confidential</p>	<p><b>Document Title and Purpose of Review:</b>  Provide a summary of new contracts in excess of \$250,000 from January through December 2013, in the format used for T-7 table reporting. Please list contracts in order of value from Highest to lowest.</p>
	<p><b>Summary of Contents:</b>  See Disc 1 for summary of contents</p>
	<p><b>Conclusions:</b></p>
	<p><b>Data Request(s) Generated:</b>  No. _____ Description:  No. _____ Description:</p>
	<p><b>Follow-up Required:</b>  *Need an explanation of what new contracts are for</p>
<p><b>Document #: 1-27</b>  <b>Date Requested: 11/15/2013</b>  <b>Date Received: 1/17/2014</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Document Title and Purpose of Review:</b>  Provide a list of change orders from January through December 2013. List by uprated unit. Provide contract number, CO number, CO initiation date, value, and CO completion date.</p>
	<p><b>Summary of Contents:</b>  See FPL's response to ICDR 1.24</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 #: 1-28</b>  <b>Date Requested: 11/15/2013</b></p>	<p><b>Document Title and Purpose of Review:</b>  Please provide all single and sole source justifications for all contracts and change orders from January through December 2013.</p>

<p>Date Received: 1/17/2014  Comments: (i.e., Confidential)   Confidential</p>	
	<p><b>Summary of Contents:</b>   See Disc 1 for summary of contents</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 #: EPU DR1-29</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b>   Confidential</p>	<p><b>Question or Request:</b> Please list any internal and/or external audits completed regarding uprate or close-out activities from January-December 2013. Provide the audit report, recommendations, management responses, and actions taken as a result of these audits.</p>
	<p><b>Summary of Contents:</b></p> <p>1. St. Lucie Nuclear Plant [redacted] and [redacted] performed by FPL Internal Auditing was completed on 3/29/13. [redacted] complete; this was an [redacted] FPL is in the process of [redacted] from [redacted] their [redacted] and the [redacted] as appropriate.</p> <p>2. The Extended Power Uprate Project 2012 Expenditures audit was performed by Experis under FPL Internal Auditing direction and supervision and was completed on 5/31/13. Approximately \$1.4B involved; the audit examined \$ [redacted] or [redacted] % of the total. Looked at employee reimbursed expenses, third party invoices, payroll, and reconciling of amounts included in FPSC filings to amounts subject to audit testing. Overall opinion: Project controls are [redacted]. One [redacted] of \$ [redacted] was [redacted]. Auditors believe this is [redacted] and [redacted].</p> <ul style="list-style-type: none"> <li>• Employee Reimbursed Expenses - reviewed [redacted] largest, total \$ [redacted] (%) of \$ [redacted] involved. [redacted]</li> <li>• Invoices – reviewed [redacted] (\$ [redacted] or [redacted] %). [redacted] – as noted above.</li> <li>• Payroll – reviewed [redacted] % (\$ [redacted] hv [redacted] employees) [redacted]</li> <li>• Reconciliation - [redacted]</li> </ul>

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5. FPL EPU [redacted] Review by FPL Internal Auditing completed 12/18/13. There were [redacted] involving a [redacted] that [redacted] employees who got [redacted] between July and December 2012 (total \$ [redacted] were [redacted] IA selected [redacted] records for review in a [redacted] from PSL and PTN who received [redacted] [redacted] had some type of [redacted] and received [redacted] totaling \$ [redacted]. The audit identified [redacted] of [redacted] (%) who got [redacted] for which they [redacted]. Total [redacted] (based upon [redacted] information) is \$ [redacted]. That is a [redacted] % weighted average [redacted] that to the entire [redacted] program, it is \$ [redacted] of likely [redacted]. This amount (\$ [redacted] was [redacted] from the [redacted] and [redacted] from [redacted].

One other audit, completed subsequent to the DR requesting all audit reports : **Review of EPU 2014 Expenditures** 2/21/14  
 Conclusion: Project controls are [redacted]. The review examined \$ [redacted] % of total expenditures)  
 • Employee Reimbursed Expenses - reviewed [redacted] expense reports. \$ [redacted] % of \$ [redacted]  
 • Invoices – reviewed [redacted] invoices (\$ [redacted] or [redacted] %) of \$ [redacted]  
 • Payroll – an [redacted] charge of \$ [redacted] a [redacted] on the spot.  
 • Reconciliation – accurate, complete reconciliation.

Audits are available for review at FPL's Tallahassee office located at 215 S. Monroe Street Tallahassee, FL 32301.

Additionally, FPL currently has two internal audit reviews which relate to [redacted] with respect to [redacted] employees [redacted] to such [redacted] that are privileged.

Conclusions:



	<b>Data Requests Generated (use format "No. ____, Description:"): </b>
	<b>Follow-up Required:</b> Re #1. Obtain details on [REDACTED] of [REDACTED] and if [REDACTED] will be [REDACTED] of the FPL NCRC request. Re #4. Did NBO make the [REDACTED] to the KPI Gen?
<b>Document #:1-30</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>  Confidential	<b>Document Title and Purpose of Review:</b> Provide copies of all EPU contractor evaluations completed during January-December 2013. Describe any corrective actions taken as a result of contractor evaluations.
	<b>Summary of Contents:</b> See Disc 1 for summary of contents
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> No. ____ Description: No. ____ Description:
	<b>Follow-up Required:</b> *What were the impacts to schedule and cost discussed by the contractor?
<b>Document #:1-31</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b> Describe new project controls implemented by owner organizations as a result of quality assurance reviews, internal auditing, or external audit findings, during January-December 2013. Provide copies of related audits and QA reviews.
	<b>Summary of Contents:</b> There were no new project controls implemented as a result of Quality Assurance reviews, internal audits, or external audits in 2013. Accordingly, there are no related audits or QA reviews.
	<b>Conclusions:</b>
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	<b>Follow-up Required:</b>
<b>Document #:1-32</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>  <b>Confidential</b>	<b>Document Title and Purpose of Review:</b> a) Please list any Siemens invoices and billing greater than \$1M during January-December 2013. Include work order number, work description, work completion date, invoice number, Invoice date, dollars invoiced, date of payment, and amount paid. b) Please list Siemens discounts, credits, or other reductions in invoicing or billing greater than \$1M during January-December 2013. c) Please list Siemens accruals greater than \$1M during the period January-December 2013.
	<b>Summary of Contents:</b>  See Disc 1 for summary of contents
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> <b>No. _____ Description:</b> <b>No. _____ Description:</b>
	<b>Follow-up Required:</b>
<b>Document #:1-33</b> <b>Date Requested: 11/15/2013</b> <b>Date Received: 1/17/2014</b> <b>Comments: (i.e., Confidential)</b>	<b>Document Title and Purpose of Review:</b>  List any describe EPU and/or close-out employee concerns and complaints reported from January through December 2013. Please summarize the concern by date received, method of Receipt (walk-in, telephonic, under the door, or Red Letter referral), allegation, investigator assigned, investigation results, and disposition.
<b>Confidential</b>	<b>Summary of Contents:</b>  See Disc 1 for summary of contents
	<b>Conclusions:</b>
	<b>Data Request(s) Generated:</b> <b>No. _____ Description:</b> <b>No. _____ Description:</b>
	<b>Follow-up Required:</b>





## Office of Auditing and Performance Analysis Document Summary and Control Log

Company: FPL  
 Area: Nuclear Controls Review  
 Auditor(s): Rich / Hallenstein

Workload Control #: PA-14-01-001

File Name: i:\Performance Analysis Section\00 PERFORMANCE ANALYSIS AUDITS\Nuclear Controls Review 2014\FPL\3.0 Work Papers\3.3 Document Summaries PTN\3.3.1 DocSumLog EPU DR-1 (DR-1.29 only).doc

Document #: EPU DR-1.29

Date Requested:

Date Received:

Comments: (i.e., Confidential)

REQUESTED  
 CONFIDENTIAL  
 BY NOI

**Question or Request:** Please list any internal and/or external audits completed regarding uprate or close-out activities from January-December 2013. Provide the audit report, recommendations, management responses, and actions taken as a result of these audits.

**Summary of Contents:**

1. St. Lucie Nuclear Plant [redacted] and [redacted] performed by FPL Internal Auditing was completed on 3/29/13 [redacted] complete: this was an [redacted] FPL is in the process of [redacted] from [redacted] their [redacted] and the [redacted] as appropriate.

2. The Extended Power Uprate Project 2012 Expenditures audit was performed by Experis under FPL Internal Auditing direction and supervision and was completed on 5/31/13. Approximately \$1.4B involved; the audit examined \$ [redacted] or [redacted] % of the total. Looked at employee reimbursed expenses, third party invoices, payroll, and reconciling of amounts included in FPSC filings to amounts subject to audit testing. Overall opinion: Project controls are [redacted]. One [redacted] of \$ [redacted] was [redacted]. Auditors believe this is [redacted] and [redacted].

- Employee Reimbursed Expenses - reviewed [redacted] largest total \$ [redacted] % of \$ [redacted] involved. [redacted]
- Invoices - reviewed [redacted] (\$ [redacted] or [redacted] %). [redacted] as noted above.
- Payroll - reviewed [redacted] % (\$ [redacted] by [redacted] employees) [redacted]
- Reconciliation - [redacted]

3 [redacted]

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Division of Regulatory Compliance  
 Bureau of Performance Analysis

i:\PERFORMANCE ANALYSIS SECTION\00 PERFORMANCE ANALYSIS AUDITS\Nuclear Controls Review 2014\FPL\3.0 Work Papers\3.3 Document Summaries EPU\3.3.1 DocSumLog EPU DR-1 (DR-1.29 only).doc

5. [REDACTED] FPL EPU [REDACTED] Review, by FPL Internal Auditing completed 12/18/13. There were [REDACTED] between July and December 2012 (total [REDACTED] involving a [REDACTED] ha [REDACTED] employees who got [REDACTED] from PSL and PTN who received [REDACTED] \$ [REDACTED] were [REDACTED] IA selected [REDACTED] records for review in a [REDACTED] and received [REDACTED] totaling \$ [REDACTED]. The audit identified [REDACTED] of [REDACTED] (%) who got [REDACTED] for which had some type of [REDACTED]. Total [REDACTED] (based upon [REDACTED] information) is \$ [REDACTED]. That is a [REDACTED] % weighted average [REDACTED] they [REDACTED]. [REDACTED] hat to the entire [REDACTED] program, it is \$ [REDACTED] of likely [REDACTED]. This amount (\$ [REDACTED] was from the [REDACTED] and [REDACTED] from [REDACTED].

One other audit, completed subsequent to the DR requesting all audit reports: **Review of EPU 2014 Expenditures 2/21/14**  
Conclusion: Project controls are [REDACTED]. The review examined \$ [REDACTED] % of total expenditures)

- Employee Reimbursed Expenses - reviewed [REDACTED] expense reports, \$ [REDACTED] % of \$ [REDACTED]
- Invoices – reviewed [REDACTED] invoices (\$ [REDACTED] % of \$ [REDACTED])
- Payroll – an [REDACTED] charge of \$ [REDACTED] a [REDACTED] on the spot.
- Reconciliation – accurate, complete reconciliation. [REDACTED]

Audits are available for review at FPL's Tallahassee office located at 215 S. Monroe Street Tallahassee, FL 32301.

Additionally, FPL currently has two internal audit reviews which relate to [REDACTED] with respect to [REDACTED] employees [REDACTED] to such [REDACTED] that are privileged.

**Conclusions:**

**Data Requests Generated (use format "No. \_\_\_\_, Description:"):**

**Follow-up Required: Yes:**

- Re #1. Obtain details on [REDACTED] of [REDACTED] and if [REDACTED] will be [REDACTED] of the FPL NCRC request.
- Re #4. Did NBO make the [REDACTED] to the KPI Gen?

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## Office of Auditing and Performance Analysis Document Summary and Control Log

Company: FPL  
 Area: Nuclear Controls Review  
 Auditor(s): Rich / Hallenstein

Workload Control #: PA-14-01-001  
 File Name: I:\Performance Analysis Section\00 PERFORMANCE ANALYSIS AUDITS\Nuclear Controls Review 2014\FPL\3.0 Work Papers\3.3 Document Summaries PTN\3.3.1 DocSumLog PTN DR-1.doc

Document #: PTN DR-1.1  
 Date Requested:  
 Date Received:  
 Comments: (i.e., Confidential)

**Question or Request:**

- PTN DR1.1 Regarding Turkey Point 6&7 construction:
- Please describe the company outlook, philosophy, and intent to construct.
  - What is the current in-service dates for Units 6 and Unit 7?
  - What is the current estimated full capital cost of the project?
  - Please complete the right-hand column for project schedule dates:

Project Phase		Original	Current
Licensing	Start	2007	2007
	Finish	2012	
Site Preparation	Start	2010	
	Finish	2012	
Generation Plant	Start	2013/2015	
	Finish	2018/2020	
Transmission Facilities	Start	2010	
	Finish	2020	

**Summary of Contents:**

- FPL states it began the PTN 6&7 project because it recognized the economic, environmental and system reliability benefits of nuclear generation. It claims that thus far the company has closely scrutinized potential benefits; continues to affirm they are substantial, realistic and achievable. FPL says it remains committed to realizing those benefits for customers, requiring completion of important milestones, including: selecting a site & technology, obtaining all permits, devising an execution plan with committed contracts & schedule, and then executing the plan. FPL's states that its philosophy is to maintain a diligent, risk-managed approach to accomplish each milestone so that the project and its benefits may be delivered at the earliest practicable time.
- CODs are estimated based on Rev. 6 of the PTN 6&7 Level 1 Project Schedule, with Unit 6 in 2022 and Unit 7 in 2023.
- The total project cost estimate range is \$12.7 to \$18.5 billion.
- Milestones below are estimated based on Rev 6 of the project schedule:

Project Phase		Original	Current
Licensing	Start	2007	2007
	Finish	2012	2014
Site Preparation	Start	2010	2014
	Finish	2012	2016
Generation Plant	Start	2013/2015	2017/2018
	Finish	2018/2020	2022/2023
Transmission Facilities	Start	2010	2016
	Finish	2020	2022



FPL, in a revision (rec'd 05.06.14) to earlier DR-1.1 response, provided the information in the chart below. Revisions are in bold, highlighted in orange

Project Phase		Original	Current
Licensing	Start	2007	2007
	Finish	2012	2014
Site Preparation	Start	2010	2014
	Finish	2012	2016
Generation Plant	Start	2013/2015	2016
	Finish	2018/2020	2022/2023
Transmission Facilities	Start	2010	2014
	Finish	2020	2022

Conclusions:

Data Requests Generated:

Follow-up Required:

Document #: PTN DR-1.2  
Date Requested:  
Date Received:  
Comments: (i.e., Confidential)

Question or Request: Regarding project critical path:

- Please identify the current project critical path.
- Please describe critical path and timeline impacts from NRC COLA review delays.
- Does the anticipated COLA approval date remain September 2014?
- If the COLA approval date has changed, what is the new date?

Please explain how adjustment to the COLA approval date will effect project schedule.

Summary of Contents:

- FPL identified project critical activities in RED on the attached Rev. 6 of the PTN 6 & 7 Level 1 Project Schedule (see graphic below) and vary depending on the stage of the project. **The current critical path activity is the receipt of the Army Corps of Engineers (ACOE) wetland permits**, which in combination with a (FL) state Site Certification (Activity ID FPLMM90010) are the environmental regulatory pre-requisites for beginning site clearing activities. Please note that the schedule has not been revised since 2012, pending publication of a revised COLA Review Schedule.
- The ACOE will use the Environmental Impact Statement (EIS) produced through the NRC COL process as its Record of Decision (ROD) for issuance of wetland permits. Therefore, the current critical path activity is tied to the schedule for the NRC EIS. In the past two years, extended time required to achieve interim NRC COLA schedule milestones has been accommodated through use of margin in the schedule and deferring certain activities without revising target dates. Given the time required to complete the activities in the COLA process, **it is unlikely that the remaining Rev. 6 milestones will be attained as projected**. Until a new COLA review schedule is published, estimation of the impacts to the overall schedule cannot be developed. FPL currently estimates a revised COLA Review Schedule for PTN 6&7 will be published in mid-2014.
- Please see the response to 2.b.
- Please see the response to 2.b. A project schedule review will be conducted once a revised COLA review schedule is published. In the project schedule review, the effect of changes to the estimated COLA approval date will be one, but not the sole factor considered. Additionally, the review will incorporate updated estimates for pre-construction and construction activity sequence and duration, including the impacts of recent amended legislation and subsequent rulemaking.

Conclusions:

	<p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required: Yes;</b></p> <ul style="list-style-type: none"> <li>• Pending publication of a revised NRC COLA review schedule, has FPL put together a 'potential schedules' or 'best guess schedules' or postulated how timelines and critical paths may be effected by various changes to the COLA review schedule?</li> <li>• How long does FPL believe it will take to conduct a project schedule review after receipt of a revised COLA review schedule?</li> </ul>
<p><b>Document #: PTN DR-1.3</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Discuss the current status of the NRC COLA review schedule.</p> <p><b>Summary of Contents:</b> The NRC COLA review schedule is "under review", as identified on the NRC website (<a href="http://www.nrc.gov/reactors/new-reactors/col/turkey-point/review-schedule.html">http://www.nrc.gov/reactors/new-reactors/col/turkey-point/review-schedule.html</a> ).</p> <p>The NRC has ID'd two review areas that require additional info before they can finish the review. The first is additional seismic info, found in Sect 2.5 of the Final Safety Analysis Report (FSAR) submitted by FPL. FPL has met with NRC to determine scope of the requirement, conducted additional on-site testing and is in the analysis phase that will result in the required additional info. FPL targets submittal 2Q14. FPL states it has been receiving chapters from the NRC Staff's draft Safety Evaluation Report (SER) for proprietary review, having reviewed 12 of 19 chapters with no open items, indicating that the SER is far along in the production process and should move quickly once the FPL submittal is received by the NRC. The second area relates to the alternate site analysis, described in Sect. 9.3 of the FPL's Environmental Report. This involves providing info to satisfy the National Environmental Protection Act (NEPA)-based requirements and guidelines governing NRC analysis and the Clean Water Act (CWA)-based requirements that also inform the ACOE LEDPA analysis, separate from the NEPA review. FPL says coordination with NRC and ACOE staff has been accomplished through significant effort and several public meetings over the past 18 months. As with the SER, FPL understands that the Draft Environmental Impact Statement (DEIS) is largely complete, awaiting resolution of Sect. 9.3 issues. Upon completion of the SER and the DEIS, the milestones in the NRC review process require 12-16 months to complete.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: PTN DR-1.4</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please describe the current status of resolving problems with COLA FSAR 2.5.</p> <p><b>Summary of Contents:</b> FPL states that the company has worked diligently to provide the NRC with the additional info required to complete the FSAR 2.5 review. FPL has hired expert third party reviewers, conducting QA reviews of contractors and their subcontractors and implemented corrective actions to improve project submittals. The company says it has also focused on maintaining a strong open dialogue with the NRC. This has been accomplished via weekly calls between FPL and the NRC managers for safety and environmental areas, and participating in 8 public meetings and 5 less formal meetings (drop-ins) with NRC management. These efforts complement the development of additional data and analysis identified through these meetings. As of October 31, 2013, additional on-site investigation was completed to assess certain seismic properties of the underlying geology. The engineering analysis and calculations are being conducted to provide a response to NRC RAI's. On completion, FPL will respond to the NRC RAIs -- scheduled to be provided in June 2014.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: PTN DR-1.5</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please explain how 2013 NRC changes and delays (e.g. COLA, FSER, FEIS, review schedule, and hearing dates) have impacted or may impact project decision making and critical path.</p> <p><b>Summary of Contents:</b> see FPL response to DR-1.2, above</p> <p><b>Conclusions:</b></p>



	<b>Data Requests Generated (use format "No. ____, Description:"):</b>
	<b>Follow-up Required:</b>
<b>Document #: PTN DR-1.6</b>	<b>Question or Request:</b> Please provide a list and description of NRC requests for additional information (RAI) received since January 1, 2013. Provide the RAI number, date received, NRC due date, and actual or anticipated date of each FPL response.
<b>Date Requested:</b>	
<b>Date Received:</b>	<b>Summary of Contents:</b> See the NRC RAI Tables 1 and 2 furnished by FPL (in the notebook) Table 1 provides the status of RAIs for which responses have been submitted, while Table 2 provides the status of RAIs which will be responded to in the future.
<b>Comments: (i.e., Confidential)</b>	
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"):</b>
	<b>Follow-up Required:</b>
<b>Document #: PTN DR-1.7</b>	<b>Question or Request:</b> Please describe, identify the agency, and provide the date of federal applications, approvals, and/or certifications completed in 2013 and anticipated in 2014 or beyond.
<b>Date Requested:</b>	
<b>Date Received:</b>	<b>Summary of Contents:</b>
<b>Comments: (i.e., Confidential)</b>	<ul style="list-style-type: none"> <li>• There were no federal applications, approvals and/or certifications issued or submitted in 2013.</li> <li>• The FAA permits for the Units 6 &amp; 7 Containment Structures will expire in 2014 and will need to be renewed.</li> <li>• The dates for the issuance of the following reports, permits or licenses is currently under review: <ul style="list-style-type: none"> <li>a. NRC Final Safety Evaluation Report (SER),</li> <li>b. NRC Environmental Impact Statement (EIS),</li> <li>c. NRC Combined Operating License (COL),</li> <li>d. ACOE 404b and Section 10 permit</li> </ul> </li> <li>• Permit applications for the following activities will be submitted prior to construction: <ul style="list-style-type: none"> <li>a. FAA permission to locate construction cranes,</li> <li>b. permission to place facilities in the vicinity of or otherwise use levees owned or controlled by the SFWMD and originally constructed by the USACOE (USACE 408 permit administered by SFWMD),</li> <li>c. If necessary, applications submitted to ACOE and DOI to permit access to government owned land in Everglades National Park, for the purpose of wetlands and listed-species surveys within the western transmission line right-of-way.</li> </ul> </li> </ul>
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"):</b>
	<b>Follow-up Required:</b>
<b>Document #: DR-1.8</b>	<b>Question or Request:</b> Please describe, identify the agency, and provide the date of state applications, approvals, and/or certifications completed in 2013 and anticipated in 2014 or beyond.
<b>Date Requested:</b>	
<b>Date Received:</b>	<b>Summary of Contents:</b>
<b>Comments: (i.e., Confidential)</b>	<ul style="list-style-type: none"> <li>• On 01.28.13 submitted application to convert exploratory well (EW-1) to an injection well &amp; begin operational testing. On 07.29.13 FDEP issued Underground Injection Control Class I Injection Well System Construction &amp; Testing Permit ( 293962-002-UC).</li> <li>• It is expected that the Siting Board will make a determination regarding Site Certification and issue the Final Order in early 2014. It is expected that FDEP will issue the Industrial Wastewater permit modification in 2014.</li> <li>• Permit applications for the following activities will be submitted prior to construction: <ul style="list-style-type: none"> <li>a. permit to allow for the construction of an additional 12 UIC wells,</li> <li>b. permit to allow for the operation of UIC wells,</li> </ul> </li> </ul>



	<p>c. generic NPDES permit to allow for management of construction related storm water</p> <ul style="list-style-type: none"> <li>Permit applications to allow for transport of radioactive materials into the State of Utah and the State of Tennessee issued by the Utah Department on Environmental Quality and the Tennessee Department of Environmental and Conservation Division of Radiological Health, respectively, for low-level radioactive waste processing or disposal, will be submitted after COL issuance.</li> <li>A permit application for a Title V (Air) permit will be submitted prior to unit operation.</li> </ul> <p>Conclusions:</p> <p>Data Requests Generated (use format "No. ____, Description:"): </p> <p>Follow-up Required: Yes;</p> <ul style="list-style-type: none"> <li>update status of the Siting Board's Final Order</li> <li>When in 2014 does FPL expect issuance of Industrial Wastewater permit modification?</li> </ul>
<p>Document #: DR-1.9 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Question or Request: Please describe, identify the agency, and provide the date of county/municipal applications, approvals, and/or certifications completed in 2013 and anticipated in 2014 or beyond.</p> <p>Summary of Contents:</p> <ul style="list-style-type: none"> <li>There were no county/municipal applications submitted in 2013.</li> <li>On 01.31.13 Miami-Dade County (MDC) issued its Land Use Consistency determination and on 01.10.13 MDC issued an Unusual Use Zoning approval for ancillary facilities (Resolution No. Z-1-13).</li> <li>There are no other pending county or municipal approvals that are not assumed in the site certification. Under FL law, the site certification is the sole license. The Final Order on certification is expected to be issued in 2014.</li> </ul> <p>Conclusions:</p> <p>Data Requests Generated (use format "No. ____, Description:"): </p> <p>Follow-up Required: Yes;</p> <ul style="list-style-type: none"> <li>Obtain an estimate of when in 2014 FPL expects the Final Order on certification.</li> </ul>
<p>Document #: DR-1.10 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Question or Request: From January 1, 2013 to date, please describe new or additional NRC initiatives resulting from the 2011 Fukushima incident and their impacts to Turkey Point 6&amp;7 project regulatory, safety, inspection, or reporting requirements.</p> <p>Summary of Contents: FPL states there were direct and indirect activities attributable to Fukushima. FPL got inquiries requiring two updated RAI responses relating to technical issues ID'd through post-Fukushima reviews related to Spent Fuel pool instrumentation and incorporating a new seismic model for the Central and Eastern U.S. (CEUS). Working with industry parties, FPL submitted responses to both issues in early 2013. No specific impact to the PTN6&amp;7 project schedule is attributable. Industry and regulatory response to Fukushima created additional demand for specialized resources and a higher level of review detail in seismic, geology and geotechnical engineering. Collectively, these have impacted PTN 6&amp;7 Safety review at the NRC. Following the initial industry and NRC assessment of Fukushima, additional inquiries and attention were directed to specific FPL COLA sections. FPL responded (2013) by providing additional analysis for tsunamis and hurricane missiles. Satisfying these seismic area RAIs requires effort for the PTN6&amp;7 project above that of first wave projects, whose licenses have been issued. Final resolution of seismic-related issues is expected in 2014. Given the parallel and ongoing review of environmental issues, it is difficult to estimate the specific impact of this additional effort on the PTN6&amp;7 project. However, it is clear that technical resources applied in late 2012 and 2013 are a result of these more detailed reviews.</p> <p>Conclusions:</p> <p>Data Requests Generated (use format "No. ____, Description:"): </p> <p>Follow-up Required: Yes;</p> <ul style="list-style-type: none"> <li>When in 2014 does FPL anticipate final resolution of seismic-related issues?</li> </ul>
<p>Document #: DR-1.11</p>	<p>Question or Request: Please describe how FPL intends to satisfy the requirements of 366.93(3)(f)3 F.S. "...that it has committed</p>

<p><b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><i>sufficient, meaningful, and available resources to enable the project to be completed and that its intent is realistic and practical."</i></p> <p><b>Summary of Contents:</b> FPL initiates its reply by providing the entirety of the subparagraph, which reads as follows:</p> <p><i>"Beginning January 1, 2014, in making its determination for any cost recovery under this paragraph, the commission may find that a utility intends to construct a nuclear or integrated gasification combined cycle power plant only if the utility proves by a preponderance of the evidence that it has committed sufficient, meaningful, and available resources to enable the project to be completed and that its intent is realistic and practical."</i></p> <p>The company states that this (paragraph (f) addresses two scenarios:</p> <ol style="list-style-type: none"> <li>1. in which a utility has not begun construction 10 years after receiving a license from the NRC and</li> <li>2. in which a utility has not begun construction 20 years after receiving a license from the NRC.</li> </ol> <p>The company maintains that only in those two scenarios do the terms – and the new language regarding “<i>intent to build</i>” – apply. FPL says that neither scenario is applicable to the PTN6&amp;7 project at this time. This language also has been included in amended Section 25-6.0423(6)(c)5 of the Nuclear Cost Recovery rule, which is related to annual feasibility analyses. FPL says it will comply with this new rule language in the same manner it has complied with the feasibility analysis requirement annually in Nuclear Cost Recovery proceedings. The company will continue to demonstrate intent as it has in prior years. FPL says that it will also continue to demonstrate in testimony the sufficiency of resources it has in place to enable success at the current stage of the project.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format “No. ____, Description:”):</b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-1.12</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please provide a timeline for:</p> <ul style="list-style-type: none"> <li>• 2013 project milestones</li> <li>• Anticipated project milestone dates, 2014</li> <li>• Anticipated project milestone dates 2015 through project completion.</li> </ul> <p><b>Summary of Contents:</b></p> <p><b>2013 Project Milestones</b></p> <ul style="list-style-type: none"> <li>• January 2013 - Additional Zoning approvals (Miami-Dade County)</li> <li>• February 2013 - NRC Public Meeting on Alternate Site Issues (ER 9.3)</li> <li>• April 2013 - NRC Public Meeting on Seismic Issues (FSAR 2.5)</li> <li>• May 2013 - NRC Public Meeting on Seismic Issues (FSAR 2.5)</li> <li>• May 2013 - NRC Public Meeting on Alternate Site Issues (ER 9.3)</li> <li>• July 2013 - SCA Hearings Begin</li> <li>• August 2013 - NCRC Hearings</li> <li>• September 2013 - NRC Public Meeting on Seismic Issues (FSAR 2.5)</li> <li>• October 2013 - SCA Hearings End</li> <li>• November 2013 - NRC Public Meeting on Alternate Site Issues (ER 9.3)</li> <li>• December 2013 - SCA Recommended Order issued by Administrative Law Judge</li> </ul> <p><b>2014 Project Milestones</b></p> <ul style="list-style-type: none"> <li>• January 2014 - Publication of ENP Draft EIS for Land Exchange (60 day public comment)</li> <li>• February 2014 - Siting Board Convenes (estimated)</li> </ul>



- March 2014 - All Environmental RAIs complete
- March 2014 - UIC Injection Test
- TBD - 2013 NCRC filing
- TBD - 2014/15 NCRC filing
- June 2014 - All Safety RAIs addressed
- \*June 2014 - Revised COLA Schedule
- TBD - NCRC Hearings
- \*August 2014 - NRC Draft EIS Issued
- December 2014 - NCRC Agenda Conference

\* Contingent on revised NRC COLA schedule. FPL states that 2015 (and later) milestones will be consistent with those provided in the PTN6&7 Level 1 Project Schedule (see DR-1.2), adjusted to accommodate the revised COLA review schedule dates and other factors affecting pre-construction and construction activity sequence and duration.

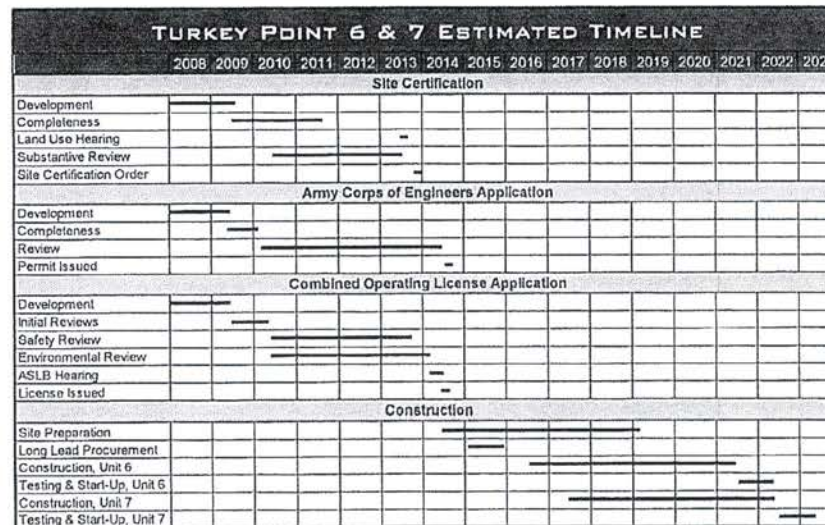
**Conclusions:**

**Data Requests Generated (use format "No. \_\_\_\_, Description:"):**

**Follow-up Required:**

Document #: DR-1.13  
 Date Requested:  
 Date Received:  
 Comments: (i.e., Confidential)

**Question or Request:** Please update the timeline below, as required, adding identified float as a separate color:



**Summary of Contents:** FPL did not provide an updated estimated timeline, stating that only when a revised COLA review schedule is published, will FPL be able to conduct a review of the PTN6&7 Level 1 Project Schedule. That review, the company says, will incorporate updated estimates for pre-construction and construction activity sequence and duration, and only at that time can the estimated timeline be accurately revised.

**Conclusions:**



	<b>Data Requests Generated (use format "No. ____, Description:"):</b>
	<b>Follow-up Required:</b>
<b>Document #: DR-1.14</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<p><b>Question or Request:</b> For Turkey Point 6&amp;7 project construction, please indicate:</p> <ol style="list-style-type: none"> <li>Whether FPL has decided to pursue an EPC or an EP&amp;C contract.</li> <li>What considerations will FPL use to determine which type of contract to sign?</li> <li>What is the timetable for making a decision between EPC or EP&amp;C?</li> <li>If and how FPL identified possible or preferred candidates for an EPC or EP&amp;C.</li> <li>Whether and when negotiations will begin with possible EPC or EP&amp;C contractors.</li> <li>What is the target month/year to sign a project construction contract(s)?</li> </ol>
	<p><b>Summary of Contents:</b></p> <ol style="list-style-type: none"> <li>FPL states that is has made no decision regarding the form of contract at this time.</li> <li>the company said it will consider a balance of risk and economic factors. These include, but are not limited to capital cost, cost certainty, contractor experience, contractor risk share, risk management, execution schedule, execution complexity and lessons learned from the first wave U.S. AP1000 projects.</li> <li>A determination will be made concurrent with a decision to move to the construction phase, and will be presented to the FPSC as a part of the request to proceed.</li> <li>FPL is monitoring progress at the first wave U.S. AP1000 projects as one indication of credible contractor candidates. For certain EP scope, FPL will rely on sole source providers.</li> <li>Negotiations have not yet begun. Negotiations will be identified in the updated PTN6&amp;7 Level 1 Project Schedule.</li> <li>Current (Rev 6) PTN6&amp;7 Level 1 Project Schedule indicates 09.14 to sign an EP contract, and 04.15 to sign a C contract. <b>These dates are anticipated to change</b> with the revised PTN6&amp;7 Project Schedule. As stated in DR-1.2, FPL intends to revise the Project Schedule after receipt of a revised NRC COLA Review Schedule.</li> </ol>
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"):</b>
	<b>Follow-up Required:</b>
<b>Document #: DR-1.15</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<p><b>Question or Request:</b> Please recap project work completed, ongoing, or anticipated since May 2013.</p>
	<p><b>Summary of Contents:</b> COLA activities focused on outstanding NRC RAIs related to alternate sites and seismic issues, including work on Safety and Environmental related RAIs. Three public meetings held to facilitate commo between NRC staff and FPL on issues related to seismology, geology and geotechnical engineering. Specific RAIs were ID'd; FPL has responded is in the process of responding through additional on-site testing and analysis. Three public meetings held on issues related to alternative site analysis. This endeavor included coordination with ACOE. RAIs were ID'd and FPL has responded to all environmental RAIs. FPL participated in industry groups monitoring construction at Vogtle and Summer and other pertinent AP1000 issues. FPL has reviewed 12 of 19 chapters of the NRC's draft Safety Evaluation Report (SER); these chapters have no open items. SCA activities have focused on prep for and conduct of SCA hearings and achieving mutually agreeable stipulations with state, regional and local parties. Twenty nine separate stipulations were executed with a range of stakeholders. The hearings predominantly dealt with best locations for project transmission lines. After eight weeks of hearings, Administrative Law Judge (ALJ) issued a Recommended Order supporting certification of two nuclear reactors and associated facilities, including transmission lines. ALJ indicated that corridors requested by FPL were the best choice when considering adverse impacts, including cost.</p> <p>The UIC Exploratory Well was completed and the permit to convert to an operational well was processed. FPL is now preparing to conduct a test injection of the well in 1Q14 to demonstrate that the well operates as designed.</p>

	<p>NCRC proceedings were supported throughout the year with the necessary filings and hearings. The FPSC approved FPL's 2014 request for recovery in Order No. PSC-13-0493-FOF-EI issued on October 18, 2013.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"):</b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-1.16</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please list and provide a description and date for each project milestones achieved in 2013.</p> <p><b>Summary of Contents:</b>  January 2013 - Additional Zoning approvals (Miami-Dade County)  February 2013 - NRC Public Meeting on Alternate Site Issues (ER 9.3)  April 2013 - NRC Public Meeting on Seismic Issues (FSAR 2.5)  May 2013 - NRC Public Meeting on Seismic Issues (FSAR 2.5); NRC Public Meeting on Alternate Site Issues (ER 9.3)  July 2013 - SCA Hearings Begin  August 2013 - NCRC Hearings  September 2013 - NRC Public Meeting on Seismic Issues (FSAR 2.5)  October 2013 - SCA Hearings End  November 2013 - NRC Public Meeting on Alternate Site Issues (ER 9.3)  December 2013 - SCA Recommended Order issued by Administrative Law Judge</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"):</b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-1.17</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please list, describe, and provide a target date for any project milestones anticipated in 2014.</p> <p><b>Summary of Contents:</b>  January 2014 - Publication of ENP Draft EIS for Land Exchange (60 day public comment)  February 2014 - Siting Board Convenes (estimated)  March 2014 - All Environmental RAI's complete  March 2014 - UIC Injection Test  TBD - 2013 NCRC filing  TBD - 2014/15 NCRC filing  June 2014 - All Safety RAIs addressed  *June 2014 - Revised COLA Schedule  TBD - NCRC Hearings  *August 2014 - NRC Draft EIS Issued  December 2014 - NCRC Agenda Conference</p> <p>* Contingent on revised NRC COLA schedule.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"):</b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: DR-1.18</b>  <b>Date Requested:</b></p>	<p><b>Question or Request:</b> Please provide a copy of all Turkey Point 6&amp;7 white papers from January 1, 2013 to date. Provide future white papers, until May 30, 2014, as an addendum to this request.</p>



<p>Date Received: Comments: (i.e., Confidential)</p>	<p>Summary of Contents: No project white papers were developed in 2013 or to date in 2014.</p> <p>Conclusions:</p> <p>Data Requests Generated (use format "No. ____, Description:"): </p> <p>Follow-up Required:</p>
<p>Document #: PTN DR-1.19 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Question or Request: For cooling water, please describe:</p> <ul style="list-style-type: none"> <li>a. Current status</li> <li>b. Unresolved issues</li> <li>c. Milestones achieved in 2013, with dates</li> <li>d. Milestones anticipated in 2014, with target dates</li> <li>e. Contracts</li> </ul> <p>Summary of Contents:</p> <ul style="list-style-type: none"> <li>a. ALJ Recommended Order (RO) recommends approval of FPL's plan for using reclaimed water as the primary supply and saline water from Radial Collector Wells as a backup supply. Joint Participation Agreement with Miami Dade County remains in effect.</li> <li>b. Siting Board Approval, Conditions of Certification related to construction and operation of both systems.</li> <li>c. SCA Hearing and affirmative RO (12/05/2013).</li> <li>d. Siting Board Approval (1Q14).</li> <li>e. No contracts are anticipated prior to construction contract and final Reclaimed Water Service Agreement.</li> </ul> <p>Conclusions:</p> <p>Data Requests Generated (use format "No. ____, Description:"): </p> <p>Follow-up Required: Yes; has siting board approval been received?</p>
<p>Document #: PTN DR-1.20 Date Requested: Date Received: Comments: (i.e., Confidential)</p>	<p>Question or Request: For transmission, please describe:</p> <ul style="list-style-type: none"> <li>a. Current status</li> <li>b. Unresolved issues</li> <li>c. Milestones achieved in 2013, with dates</li> <li>d. Milestones anticipated in 2014, with target dates</li> <li>e. Contracts</li> </ul> <p>Summary of Contents:</p> <ul style="list-style-type: none"> <li>a. ALJ RO recommends approval of FPL transmission corridors, and affirms overhead design as most cost-effective.</li> <li>b. Siting Board approval, acquisition of property rights necessary to construct and operate transmission infrastructure in approved corridors, Land Exchange execution supporting necessary land rights for portions of western corridor.</li> <li>c. Affirmative RO following SCA hearings (12/5/2013).</li> <li>d. Siting Board approval, progress towards achieving necessary property rights for construction and operation.</li> <li>e. To be determined, agreements for easements or other property rights approvals may be required.</li> </ul> <p>Conclusions:</p>



	<p><b>Data Requests Generated (use format “No. ____, Description:”):</b></p>
<p><b>Document #:</b> PTN DR-1.21  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Follow-up Required:</b> Yes; has siting board approval been received?</p> <p><b>Question or Request:</b> Regarding benchmarking of <u>domestic</u> new nuclear construction programs:</p> <ol style="list-style-type: none"> <li>Identify the project(s) FPL benchmarked in 2013.</li> <li>Identify the project(s) FPL plans to benchmark in 2014.</li> <li>Provide any FPL reports, studies, briefing slides or lessons learned reports.</li> </ol>
<p style="text-align: center;">REQUESTED CONFIDENTIAL BY NOI</p>	<p><b>Summary of Contents:</b></p> <p>a. The company states that it undertakes a full range of activities to obtain knowledge, insight and lessons learned by preceding new nuclear construction projects – and in that sense claims that benchmarking is an ongoing activity. Below is a description of the activities FPL engages in to benchmark other projects.</p> <p>FPL is a member of the APOG Organization Construction Committee formed by US utilities pursuing development of the AP1000. APOG Construction committee members include engineering and construction personnel from Southern Services, Duke Energy, SCANA, and FPL. Main objective of the committee is to benchmark construction of all AP1000 units to provide a quality final product for all end-users. The construction committee was established to provide input and experience from 5 utilities with a common technology, 5 Independent Construction Experience (CE)/Operating Experience (OE) Programs, 2 Supplier “CE” Programs (Westinghouse &amp; CBI Construction (formerly Shaw), and the INPO Program. The APOG construction committee meets bi-weekly (teleconference). Face-to-face meetings are held quarterly meetings; FPL states that this helps maintain continuity and provide walkdowns of sites under construction or in planning for construction. A proprietary and confidential Construction Experience (CE) Screening Log is maintained by the APOG committee to maintain a record of issues of concern and the associated actions undertaken. The AP1000 projects under construction, or planned for construction, that provide representation for the group are:</p> <ul style="list-style-type: none"> <li>• Vogtle Units 3 &amp; 4 (Southern Services)</li> <li>• VC Summer Units 2 &amp; 3 (SCANA)</li> <li>• Levy County Project Units 1 &amp; 2 (Duke Energy)</li> <li>• William States Lee III, Units 1 and 2 (Duke Energy)</li> <li>• Turkey Point Units 6 &amp; 7 (Florida Power &amp; Light)</li> <li>• Shearon Harris, Units 2 and 3 (Duke Energy)</li> <li>•</li> </ul> <p>Additionally, CBI Construction provides updates and lessons learned from construction of Sanmen and Haiyang projects (China)</p> <p>NOTE : Other specific benchmarking activities included:</p> <ol style="list-style-type: none"> <li>1. APOG Const. Cmte. benchmarking trip of MOX facility construction at Savannah River Site near Aiken (SC) 06.03-04.13</li> <li>2. AP 1000 Enhanced Shield Building Readiness Review dated 09.25.13</li> <li>3. Assessment of Oversight Improvement at VC Summer Units 2 and 3 on 11.11-14.13</li> </ol> <p>b. FPL will continue to monitor the following projects:</p> <ul style="list-style-type: none"> <li>• Sanmen and Haiyang (China National Nuclear Corporation)</li> <li>• Vogtle Units 3 &amp; 4 (Southern Services)</li> </ul>

	<ul style="list-style-type: none"> <li>• VC Summer Units 2 &amp; 3 (SCANA)</li> <li>• Levy Project Units 1 &amp; 2 (Duke Energy)</li> <li>• William States Lee III, Units 1 and 2 (Duke Energy)</li> <li>• Shearon Harris, Units 2 and 3 (Duke Energy)</li> </ul> <p>To maintain project and issue awareness, FPL provides a total of five people on six committees:</p> <ul style="list-style-type: none"> <li>• APOG Executive - 2</li> <li>• APOG Construction – 1</li> <li>• APOG Electrical – 1</li> <li>• APOG Licensing – 1</li> <li>• APOG I&amp;C – 1</li> <li>• APOG Engineering - 1</li> </ul> <p>c. FPL provided AP1000 Enhanced Shield Building, APOG Construction Committee-CE Screening Log, MOX Benchmarking, V.C. Summer NND Oversight Assessment Report and Vogtle Early Site Construction Progression. See Disk 3.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format “No. ____, Description:”):</b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> PTN DR-1.22  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Question or Request:</b> Regarding benchmarking of <u>foreign</u> new nuclear construction programs:</p> <ul style="list-style-type: none"> <li>• Identify the project(s) FPL benchmarked in 2013.</li> <li>• Identify the project(s) FPL plans to benchmark in 2014.</li> <li>• Provide any FPL reports, studies, briefing slides or lessons learned reports.</li> </ul> <p><b>Summary of Contents:</b> See FPL response to DR-1.21</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format “No. ____, Description:”):</b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #:</b> PTN DR-1.23  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Question or Request:</b> Please list all risk assessment or mitigation meetings or reviews and dates, May 2013 to date. Provide meeting slides, recaps, reports or minutes. Through May 2014, please provide slides, recaps, reports or minutes for each future meeting as a supplement to this request.</p> <p><b>Summary of Contents:</b> FPL states that tracking and characterization of project risk is a central principle behind all project reports (e.g. monthly accounting variance, vendor status, or quarterly risk assessments).</p> <p><b>FPL formal risk management is centered in two specific reporting documents.</b></p> <p>A monthly project specific dashboard tracks key project aspects that represent major risk areas. Quarterly, a broader review determines significant risk areas and associated trends. The result is Quarterly Risk Assessment.</p> <p>Monthly, the project also reports status to an executive team through meetings and presentations. When specific situations or decisions warrant, the project has the option of presenting this information to, and obtaining the advice of the FPL Risk Committee. No presentations were made to the Risk Committee in 2013. FPL included monthly dashboards in response to DR 1.26. Dated Quarterly</p>



	Risk Assessments were furnished as part of this answer (see Disk 4).	
	Conclusions:	
	Data Requests Generated (use format "No. ____, Description:"):	
	Follow-up Required:	
Document #: PTN DR-1.24 Date Requested: Date Received: Comments: (i.e., Confidential)	Question or Request: For project management policies, procedures, and controls, please: <ul style="list-style-type: none"> <li>• List those created in 2013</li> <li>• List those revised in 2013 or which are currently under revision</li> <li>• List those deleted in 2013</li> <li>• List those scheduled for revision in 2014</li> </ul>	
	Summary of Contents: <p>a. None created in 2013</p> <p>b. See list below for policies, procedures and controls revised or currently under revision.</p> <p>c. None deleted during 2013</p> <p>d. <i>Hosting Visiting Dignitaries at the FPL Juno Campus and Preconstruction Tours of the PTN 6&amp; 7 Site</i> to be revised in 2014</p>	
	Preparation, Revision, Review and Approval of New Nuclear Projects Project Instructions	Revised 12/09/13
	Project Document Retention and Records Processing	Revised 10/03/13
	COLA Configuration Control and Responses to Request for Additional Information for Project Applications	Revised 04/09/13
	NNP Project Correspondence	Revised 10/16/13
	NNP NRC Correspondence	Revised 05/07/13
	Department Training	Revised 02/15/13
	COLA Review and Acceptance Process	In Progress
	NNP PTN COLA Related Project Management Briefs, Project Memoranda, and COLA Related Document Reviews	Revised 12/11/2013
	Change Control for COL Application Information	Revised 07/08/13
	Technical Review of Commercial Project Documents	Revised 10/09/13
	Discovery Production Instructions Related to Turkey Point 6&7 Combined License Hearing	Revised 08/20/13
	Exploratory and Dual Zone Monitoring Well Project Incident Response Instructions	Revised 07/22/13
	Project Schedule Configuration and Control	In Progress
	PTN 6&7 Monthly Cost Report Process	Revised 12/09/13

Division of Regulatory Compliance

Bureau of Performance Analysis

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	<p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: PTN DR-1.25</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> For project staffing, please:</p> <ol style="list-style-type: none"> <li>Describe organization changes made or anticipated from January 2013 to May 2014.</li> <li>Provide a by-name organization chart depicting direct and indirect reporting linkages.</li> </ol> <p><b>Summary of Contents:</b></p> <ol style="list-style-type: none"> <li>New Nuclear Plant organization was moved into Nuclear Division - 03.13. (Steve) Scroggs and (Bill) Maher now report directly to Mano Nazar, Chief Nuclear Officer. FPL says this reflects a shift of focus in 2014 to the NRC COL license as the SCA process completes, and the primary activity will be NRC-related. In addition, a position was created for a Construction Director; to be filled in 2014. No other structural changes were made.</li> <li>FPL provided a generic organizational manning chart and a by-name chart. See notebook.</li> </ol> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: PTN DR-1.26</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p> <p style="text-align: center;">REQUESTED CONFIDENTIAL BY NOI</p>	<p><b>Question or Request:</b> Please provide project management reports/status updates from May 2013 to date, to include reports issued by and for senior and executive management. Topics would include, but not be limited to briefings, minutes, findings, handouts, PowerPoint slides, and reports. Going forward, until the completion of the current review, please update this list no later than the 15<sup>th</sup> day of each month (or the next business day if a weekend).</p> <p><b>Summary of Contents:</b> FPL provided these reports and status updates:</p> <ul style="list-style-type: none"> <li>• New Nuclear Updates</li> <li>• Weekly NNP Staff Meeting Attachments</li> <li>• Pre-construction graph</li> <li>• Bechtel Progress Reports</li> <li>• Bechtel Weekly Agendas</li> <li>• Monthly Cost Reports</li> <li>• Project Dashboards</li> <li>• PTN 6&amp;7 Corporate Due Diligence reports</li> </ul> <p>The company will continue to provides these reports on a monthly basis, as requested</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b> Yes; staff has requested these reports monthly, ongoing until completion of the annual NCRC audit.</p>
<p><b>6Document #: PTN DR-1.27</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please provide the Key Performance Indicators used by FPL management to monitor the status of Turkey Point 6&amp;7 projects and sub-projects. Please provide the 2013 monthly results for each indicator. Going forward, until the completion of the current NCRC review, please update this list no later than the 15<sup>th</sup> day of each month (or the next business day if a weekend).</p> <p><b>Summary of Contents:</b> See FPL response to DR-1.26</p> <p><b>Conclusions:</b></p>

	<b>Data Requests Generated (use format "No. ____, Description:"): </b>
	<b>Follow-up Required:</b>
<b>Document #: PTN DR-1.28</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Question or Request:</b> For future power purchases or joint ownership: a. Please describe actions since May 2013 seeking future power purchasers or joint owners.  b. Please list meetings held in 2013. Provide slides, notes, handouts, minutes, or reports  c. Please provide a list of meetings scheduled for 2014
	<b>Summary of Contents:</b> a. Discussions with interested parties regarding potential participation, as documented in quarterly updates to FPSC Docket No. 080271-EI. b. A meeting was held via teleconference with participants on 05.17.13. FPL stated that the presentation was included; not found c. No meetings are currently scheduled; FPL states that a meeting is usually held in May of each year.
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): </b>
	<b>Follow-up Required:</b> Yes, obtain the presentation as described in item "DR-1.28(b) above."
<b>Document #: PTN DR-1.29</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Question or Request:</b> Please describe any changes to the prior FPL view on DOE Loan Guarantee program participation. Describe 2014 anticipated actions or initiatives.
	<b>Summary of Contents:</b> The company says there are no changes; they continue to monitor publicly available info re negotiations between DOE and Southern related to potential loan guarantees for the AP1000 at Vogtle. FPL understanding is no final decisions has been made.
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): </b>
	<b>Follow-up Required:</b> Yes; Southern has accepted DOE loans – does this change the FPL perspective or intention?
<b>Document #: PTN DR-1.30</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Question or Request:</b> Please describe any revisions made during 2013 to contractor selection and management policies or procedures.
	<b>Summary of Contents:</b> NextEra Corporate Procedure NEE-PRO-1470 was revised 04.11.13 (various sections). It was provided (see Disk 4) Procurement Process Manual was revised 11.08.13 for Predetermined Source approvals. (see Disk 4). Modifications included: <ul style="list-style-type: none"> <li>• Updated guidance clarifying that PDS Administrator is to request monthly PDS SAP report from the ISC Analytics Team</li> <li>• Process changes: <ol style="list-style-type: none"> <li>1. PDS Form revised; now requires VP, ISC approval.</li> <li>2. Agent required to place copy of approved PDS Form in corresponding PDS purchase document file.</li> <li>3. PDS Administrator (monthly) facilitates reconcile, aligning PDS List and SAP-identified PDS contracts.</li> </ol> </li> </ul>
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): </b>
	<b>Follow-up Required:</b>
<b>Document #: PTN DR-1.31</b> <b>Date Requested:</b> <b>Date Received:</b>	<b>Question or Request:</b> Describe any revisions to FPL project contractor oversight or management policies and procedures during 2013.
	<b>Summary of Contents:</b> There were no revisions to FPL project contractor oversight or management policies or procedures during 2013.



<b>Comments: (i.e., Confidential)</b>	<b>Conclusions:</b> <b>Data Requests Generated (use format "No. ____, Description:"):</b> <b>Follow-up Required:</b>																																								
<b>Document #: PTN DR-1.32</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>  REQUESTED CONFIDENTIAL BY NOI	<b>Question or Request:</b> For the long lead forging agreement: a. What is the current status, terms, and expiration date? b. Are negotiations ongoing to alter status, terms, or expiration date? c. Provide the anticipated revision completion date and new expiration date. d. What is the latest date forging must begin in order to meet current project in-service dates?  <b>Summary of Contents:</b> a. FPL states the parties have extended the agreement to 10.31.14. FPL provided the agreement – (see Disk 3) . b. There are no ongoing negotiations at this time. c. See part a. Rev6, Level 1 Project Schedule; envisions execution of an EP contract (includes long lead items) by 09.30.14  <b>Conclusions:</b> <b>Data Requests Generated (use format "No. ____, Description:"):</b> <b>Follow-up Required:</b> Yes; FPL didn't really answer part "d" – reengage the company for an answer to that item.																																								
<b>Document #: PTN DR-1.33</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>  REQUESTED CONFIDENTIAL BY NOI	<b>Question or Request:</b> Please provide a list of all existing (open) project contracts valued \$250,000 or more. Provide contractor name, description of the contract or service provided, current estimated value upon completion, and type (competitive bid, single/sole source, or predetermined source; provide copies of any justifications). <b>Summary of Contents:</b> FPL provided a list of open purchase orders valued at \$250K or greater, with single source justifications and sole source memos. See Disk 3. Purchase Order 2000053246 was issued to replace Purchase Order 4500474487 (Power Engineers, Inc.; ██████ for prelim analysis of Miami River Crossing and Davis/Miami transmission line)  <b>Conclusions:</b> <b>Data Requests Generated (use format "No. ____, Description:"):</b> <b>Follow-up Required:</b>																																								
<b>Document #: PTN DR-1.34</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>  REQUESTED CONFIDENTIAL BY NOI	<b>Question or Request:</b> Please provide a list of new contracts of \$100,000 or more executed from May through December 2013 with contractor name, contract or service description, length of contract, value, methodology (e.g. T&M, fixed price, fixed w/incentives), dollars spent to date, and provide single or sole source justifications. <b>Summary of Contents:</b> FPL provided a list of four new contracts \$100K or greater, with single source justifications. See Disk 3 for SSJs.  <table border="1" data-bbox="499 1109 1883 1239"> <thead> <tr> <th>PO #</th> <th>Contractor</th> <th>Description</th> <th>Start</th> <th>End</th> <th>Value</th> <th>Methodology</th> <th>Spent</th> </tr> </thead> <tbody> <tr> <td>2000106769</td> <td>Layne Christiansen Co</td> <td>Well Consulting &amp; Services</td> <td>07.01.13</td> <td>06.26.15</td> <td>████████</td> <td>Time &amp; Expenses</td> <td>████████</td> </tr> <tr> <td>2000109580</td> <td>Audio Visual Services Group</td> <td>Hearing Support – A/V Services</td> <td>07.23.13</td> <td>10.31.13</td> <td>████████</td> <td>Time &amp; Expenses</td> <td>████████</td> </tr> <tr> <td>2000102617</td> <td>Blue Lagoon/Sofitel</td> <td>Lodging Services for Hearing</td> <td>05.06.13</td> <td>08.31.13</td> <td>████████</td> <td>Unit Price</td> <td>████████</td> </tr> <tr> <td>2000115705</td> <td>AMEC Environment &amp; Infrastructure</td> <td>FSAR 2.5.4 RFI Response Review</td> <td>10.02.13</td> <td>08.31.15</td> <td>████████</td> <td>Time &amp; Expenses</td> <td>████████</td> </tr> </tbody> </table> <b>Conclusions:</b> <b>Data Requests Generated (use format "No. ____, Description:"):</b>	PO #	Contractor	Description	Start	End	Value	Methodology	Spent	2000106769	Layne Christiansen Co	Well Consulting & Services	07.01.13	06.26.15	████████	Time & Expenses	████████	2000109580	Audio Visual Services Group	Hearing Support – A/V Services	07.23.13	10.31.13	████████	Time & Expenses	████████	2000102617	Blue Lagoon/Sofitel	Lodging Services for Hearing	05.06.13	08.31.13	████████	Unit Price	████████	2000115705	AMEC Environment & Infrastructure	FSAR 2.5.4 RFI Response Review	10.02.13	08.31.15	████████	Time & Expenses	████████
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	<p><b>Follow-up Required:</b></p> <p><b>Question or Request:</b> Please provide a list of new contracts of \$100,000 or more anticipated from January to May 2014 with contractor name, contract or service description, length of contract, value, methodology (e.g. T&amp;M, fixed price, fixed w/incentives), dollars spent to date, and provide single or sole source justifications.</p> <p><b>Summary of Contents:</b> See DR 1.34 New Contracts +100K and DR 1.34 SSI documents (Disk 3)</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"):</b></p> <p><b>Follow-up Required:</b></p>																																				
<p><b>Document #:</b> PTN DR-1.35  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Question or Request:</b> Please provide a description and status of all contract change orders (CO) valued at \$100,000 or more from May through December 2013. Provide contractor name, contract number, date, and change(s) to the contract terms or value.</p> <p><b>Summary of Contents:</b> FPL provided a list of CO's \$100K or greater, with contractor name, contract number, date, and change(s) to the contract terms or value.</p> <table border="1"> <thead> <tr> <th>PO #</th> <th>Contractor</th> <th>CO #</th> <th>Issue Date</th> <th>CO Value</th> <th>Terms</th> </tr> </thead> <tbody> <tr> <td>4500652043</td> <td>Layne Christiansen Co</td> <td>3</td> <td>06.18.13</td> <td></td> <td>Unchanged</td> </tr> <tr> <td>2000102617</td> <td>Blue Lagoon/Sofitel</td> <td>1</td> <td>07.05.13</td> <td></td> <td>Unchanged</td> </tr> <tr> <td>2000102364</td> <td>Paul C. Rizzo Assoc.</td> <td>1</td> <td>07.05.13</td> <td></td> <td>Unchanged</td> </tr> <tr> <td>2000102364</td> <td>Paul C. Rizzo Assoc.</td> <td>3</td> <td>09.16.13</td> <td></td> <td>Unchanged</td> </tr> <tr> <td>2000102364</td> <td>Paul C. Rizzo Assoc.</td> <td>4</td> <td>10.23.13</td> <td></td> <td>Unchanged</td> </tr> </tbody> </table> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"):</b></p> <p><b>Follow-up Required:</b></p>	PO #	Contractor	CO #	Issue Date	CO Value	Terms	4500652043	Layne Christiansen Co	3	06.18.13		Unchanged	2000102617	Blue Lagoon/Sofitel	1	07.05.13		Unchanged	2000102364	Paul C. Rizzo Assoc.	1	07.05.13		Unchanged	2000102364	Paul C. Rizzo Assoc.	3	09.16.13		Unchanged	2000102364	Paul C. Rizzo Assoc.	4	10.23.13		Unchanged
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<p><b>Document #:</b> PTN DR-1.36  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p> <p style="text-align: center;">REQUESTED CONFIDENTIAL BY NOI</p>	<p><b>Question or Request:</b> Please provide a description and status of all contract change orders valued at \$100,000 or more anticipated January to May 2014. Provide contractor name, contract number, date, and change(s) to the contract terms or value.</p> <p><b>Summary of Contents:</b> FPL does not anticipate any change orders greater than \$100K through May of 2014 (as of 01.14)</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"):</b></p> <p><b>Follow-up Required:</b></p>																																				
<p><b>Document #:</b> PTN DR-1.37  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p>	<p><b>Question or Request:</b> Please list warranty claims against contractors from May 2013 to date identifying the contractor, contract number, disputed amount, date of initiation, and the date (or anticipated date) of resolution. Ongoing, report any additional warranty claims using the same criteria from the date of FPL's response to May 31, 2014.</p> <p><b>Summary of Contents:</b> There was one warranty claim -- against Bechtel Purchase Order 4500395492.</p> <table border="1"> <thead> <tr> <th>Amt of Claim</th> <th>Paid to Bechtel Acct</th> <th>Paid by FPL</th> <th>Open Amount</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Amt of Claim	Paid to Bechtel Acct	Paid by FPL	Open Amount																																
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<p><b>Document #:</b> PTN DR-1.38  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments:</b> (i.e., Confidential)</p> <p style="text-align: center;">REQUESTED CONFIDENTIAL</p>																																					

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BY NOI	<p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b> Yes; this information is as of 01.14; determine if this claim has been settled and current terms.</p>
<p><b>Document #: PTN DR-1.39</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please list all on-site manufacturer visits by FPL QA from May through December 2013.</p> <p><b>Summary of Contents:</b> No QA on-site manufacturer visits occurred from May through December 2013</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: PTN DR-1.40</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please list all QA on-site manufacturer visits planned from January to May 2014.</p> <p><b>Summary of Contents:</b> No QA on-site manufacturer visits are planned from Jan-May 2014</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b></p>
<p><b>Document #: PTN DR-1.41</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p> <p>REQUESTED CONFIDENTIAL BY NOI</p>	<p><b>Question or Request:</b> Please list internal and external audits completed May-December 2013; provide audit reports.</p> <p><b>Summary of Contents:</b> The 2012 PTN6&amp;7 Project expenditures audit was performed by Experis under FPL Internal Auditing direction and supervision. It was completed on 05.31.13.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b> Yes, request appointment with FPL-Tallahassee office to review the audit report</p>
<p><b>Document #: PTN DR-1.42</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p> <p>REQUESTED CONFIDENTIAL BY NOI</p>	<p><b>Question or Request:</b> Please provide a list of ongoing internal and external audits to be completed January-May 2014; provide audit reports when completed.</p> <p><b>Summary of Contents:</b> The 2013 PTN6&amp;7 Project expenditures audit is expected to be completed in this timeframe.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b> Yes, determine completion / request appointment with FPL-Tallahassee office to review the audit report</p>
<p><b>Document #: PTN DR-1.43</b>  <b>Date Requested:</b>  <b>Date Received:</b>  <b>Comments: (i.e., Confidential)</b></p>	<p><b>Question or Request:</b> Please list internal and external audits scheduled to begin January-May 2014; provide target completion dates.</p> <p><b>Summary of Contents:</b> The 2013 PTN6&amp;7 Project expenditures audit is expected to be completed in this timeframe.</p> <p><b>Conclusions:</b></p> <p><b>Data Requests Generated (use format "No. ____, Description:"): </b></p> <p><b>Follow-up Required:</b> Yes, determine completion / request appointment with FPL-Tallahassee office to review the audit report</p>
<p><b>Document #: PTN DR-1.44</b>  <b>Date Requested:</b></p>	<p><b>Question or Request:</b> Please describe any changes in project management policies, practices, procedures, reporting or controls implemented as a result of QA reviews or internal/external audit findings.</p>



<b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Summary of Contents:</b> None
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): .</b>
	<b>Follow-up Required:</b>
<b>Document #: PTN DR-1.45</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Question or Request:</b> Please describe any changes made May-December 2013 to ECP.
	<b>Summary of Contents:</b> None
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): .</b>
<b>Document #: PTN DR-1.46</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Question or Request:</b> Please describe any ECP changes anticipated January-May 2014.
	<b>Summary of Contents:</b> None anticipated Jan-May 2014 (as of 01.14)
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): .</b>
<b>Document #: PTN DR-1.47</b> <b>Date Requested:</b> <b>Date Received:</b> <b>Comments: (i.e., Confidential)</b>	<b>Question or Request:</b> Please list project ECP allegations/complaints received since May 2013. Provide date received, method (walk-in, telephonic, under the door, or Red Letter), summary of allegation, investigator assigned, investigation results, and disposition. Going forward, provide any new EPU allegations or complaints received.
	<b>Summary of Contents:</b> None
	<b>Conclusions:</b>
	<b>Data Requests Generated (use format "No. ____, Description:"): .</b>
<b>Follow-up Required:</b>	



## ***8. Interview Schedule***

## David Rich

---

**From:** David Rich  
**Sent:** Thursday, March 20, 2014 10:44 AM  
**To:** (Soria.Talbot@fpl.com); Travis Contratto (Travis.Contratto@fpl.com)  
**Cc:** Jerry Hallenstein; Carl Vinson  
**Subject:** Proposed Topics, Staff Interviews, FPL, 3 April (possibly 4 April)

In an email to FPL on 06FEB, a tentative schedule for staff visit was provided:

- 2 April – staff arrives; no interviews
- 3 April – Interviews; AM- EPU and PM-PTN
- 4 April – AM (PTN, if needed), staff returns to TLH

Please amend 4 April to PTN or EPU, *as needed*. We should know at the end of each half-day session whether follow-up is required.

We anticipate that EPU and PTN can each be completed in a half-day session. We'd like to begin EPU at 8am, go until noon, and break for lunch until 1:30pm. Beginning PTN at 1:30pm, we will continue until 5pm.

As in previous interviews, staff requests that each project-specific session begin with an overview presentation by FPL. Power Point is preferred; staff intends to request it as a takeaway. The more subject area detail provided during each overview, the more time efficient the question and answer portions will be later. Staff notes that VP for Nuclear Power Upgrade, Terry Jones, has retired. Though that presents scheduling challenges, staff requests that he be available and with us for the EPU interview.

With EPU complete and PTN still in pre-construction, we see these interviews as 1-stop sessions, without need to have incremental time slots designated for a variety of personnel. We invite FPL to select and make available for the entire half day those people best able to address the subject areas listed below. They should not be considered exhaustive; staff will cover them but also go where discussion leads.

### EPU:

- General Project Overview / Close-Out Overview (FPL presentation)
- 2013 project budget
- 2013 outages, May 1 – December 31
- Licensing
- Contracts, warranty claims, and concessions
- Close-out activities
- Issues resulting from close-out
- Potential 2014 NCRC costs / requests
- Audits
- PSL steam generator piping

### PTN:

- General Project Overview & Status Update (FPL presentation)
- Organization – structure/changes 2013 to present; 2014 anticipated changes
- Policies, practices, and procedures; update and changes, 2013 to present
- NRC Review – Schedule update / RAIs
- State / Local Application & Licensing Status

- 2013 project budget
  - Contracts  $\geq$  \$250K (2013 thru present)
  - Change Orders  $\geq$  \$100K (2013 thru present)
  - 2014 project budget
  - Project timeline
  - Project Cost - total & by unit
  - Long lead forging(s)
  - Transmission
  - Vendor update / issues / selection
  - The way forward – 2014, 2015-and-beyond
  - “Off-ramps” / decision points
- Pushback to vendors, warrant claims



## Interview Questions

### DR1-1

- a) Summarize the uprate completed and uprate milestones achieved for PSL 1 and 2 uprates from January-December 2013 (see closeout plan list of activities completed and to be completed)
- b) Summarize close-out procedures and close-out milestones achieved for PSL 1&2 uprates from January-December 2013. (see closeout plan list of activities completed and to be completed)

### DR1-2

- a) Were the EPU modifications in 9/13 to PS1 anticipated events or required unplanned work?
- b) Were there additional project costs?
- c) If formal turnover time of EPU organization was done in July 2013, why EPU modifications made in September 2013?

### DR1-4

Original response said "did not separately budget or track closeout costs" Revised response says "EPU project tracked budgeted and tracked costs"

### DR1-5

- a) Need to discuss closeout activities that were not completed in 2013 and whether they will be requested for recovery in 2014.
- b) Are these considered to be "normal" closeout items?
- c) Is the seal warranty item holding to next outage?

When is next schedule outage?

What is the impact of the leaking seal?

Will replacement of the boot seal also be warranted?

Why weren't warranty items addressed during last outage?

### DR1-6

- a) If warranty claim, why is this not EPU related?
- b) Didn't [REDACTED] do some EPU work?
- c) When do you anticipate warranty claim being resolved?

1

d) Unscheduled outage PS1?

Were there additional costs to the EPU project due to the PS1 outage?

e) What were costs for PTN3 shutdown?

How do you determine that PSL and PTN are not EPU related?

**DR1-11**

a) What is the Administrative License Amendment?

b) Is there any potential delay or additional costs to the project if the Administrative License Amendment Request is not approved in 2014?

c) What is the overall impact of the Amendment Request and did this have any impact on project in 2013?

**DR1-14**

a) Explain the [redacted] of [redacted] with former [redacted]

1  
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b) Who is new [redacted] and what are the "additional provisions and requirements relative to the payment of [redacted] to employees of [redacted]"?

3  
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c) Who are the [redacted] and what is the [redacted] to be [redacted]?

5

d) What are the remaining [redacted] (to whom [redacted] were made) doing to [redacted] and [redacted] FPL for [redacted]?

6  
7

Warranty Claims

a) Did [redacted] reimburse FPL for any outage delay caused by replacement of seals?

8

b) Was the 2013 PSL1 refueling outage scheduled or unscheduled for EPU work? When is the PSL2 replacement part work scheduled for 2014?

c) Did [redacted] install the replacement parts at no costs? Who installed the parts? Did the EPU project incur additional installation costs?

9

d) Were any additional costs to the project incurred for the PSL-2 control room project?

e) Is the cracked baffle plate warranted for future problems?

f) Is the boot seal warranted for further problems by [redacted]?

10

- g) Does the tube cleanliness work have the potential to extend th PTN3 refueling outage? When is the outage scheduled?
- h) Does the condenser cleanliness have the potential to extend the PTN4 refueling outage? When is the outage scheduled?
- i) Is number 9 the same as 8?
- j. If the total [redacted] concessions in 2013 were \$15.5 million, what are the total concessions for [redacted] during the project? 1  
2

**DR1-24**

Determine whether the open contracts are now closed or their purpose for remaining open

**DR1-26**

Need an explanation of what new contracts are for

**DR1-29**

Re audit 1: Obtain details on [redacted] of [redacted] and if [redacted] will be [redacted] of the FPL NCRC request. 3  
4

Re audit 2. Did NBO make the [redacted] to the KPI Gen? 5

**DR1-30**

What were the impacts to schedule and cost discussed by the contractor?

**Cooling Tubes**

Is the wear more progressed than expected? Did it surprise you in anyway?

How do the dents occur?

How comparable is this plants wear to San Onofre? Is there complete lack of comparability? To what extent are lessons learned at San Onofre applied to St. Lucie.

Is there any potential link the wear at St. Lucie and the uprate having by done?

- Were cooling tubes subsequently looked at as a result the uprate?

In your studies before you decided to do the uprate, did you evaluate the potential the impact on tube wear?

- Are there studies that you could point us to that would show us evidence of uprate on tube wear?

Do you have more than 7 years of wear showing since installation of new generators in 2007?



**SCROGGS pg. 5 (lines 21-23) and pg. 6 (lines 1-2):** Please explain linear and non-linear. Why are they described that way? Is that an industry standard or an FPL description?

**SCROGGS pg. 7 (line 18):** Does "...minimizing the *current* cost exposure.." lead to higher *future* costs?

**SCROGGS pg. 8 (lines 9-11):** What is the target (month) in 2014?

**SCROGGS pg. 8 (lines 22-23):** What is the status converting the Underground Injection Control (UIC) exploratory well to an operating well?

**SCROGGS pg. 9 (lines 7-11):** How many visits were made to observe key construction milestones at Vogtle and Sumner AP1000 projects? When were they undertaken? Who made the visit(s)?

**SCROGGS pg. 9 (lines 18-19):** What is the current status on progress re the Waste Confidence rule, the pre-requisite to the NRC issuing any new COLs for new nuclear plants in the US?

**SCROGGS pg. 11 (lines 4-9):** Discuss the impact(s) and scope of it/them on project cost & schedule.

**SCROGGS pg. 13 (lines 7-16):** Provide a SAFETY analysis update.

**SCROGGS pg. 13 (lines 10-16):** Please provide an update on RAI completion. Any new RAI's?

**SCROGGS pg. 13 (lines 19-23) & pg. 14 (lines 1-3):** Provide an ENVIRONMENTAL analysis update.

**SCROGGS pg. 14 (lines 1-3):** What is the latest / best target date for a draft EIS and revised COLA review schedule?

**SCROGGS pg. 14 (lines 1-3):** Do you believe that the revised COLA review schedule will impact the current project timeline? Approximately how long after the draft EIS and revised COLA schedule will FPL publish its revised project timeline?

**SCROGGS pg. 16 (21-23) & pg. 17 (1-2):** Please update the status of the Everglade National Park (ENP) Land Exchange since the draft EIS was published in January 2014. Is it a done deal?

**SCROGGS pg. 17 (lines 4-14):** Describe changes made by the Western Consensus Corridor (WCC) for transmission and show the final configuration agreed to by parties.

**SCROGGS pg. 17 (lines 12-14):** Please explain "...additional levels of complexity to the entire project and requires continued discussions with other parties...". Who are these parties? Are discussions ongoing? What is the status of those discussions and/or agreements derived from discussions. Does this add project cost or alter the current timeline?

**SCROGGS pg. 18 (lines 1-3):** Does margin remain? How much?

**SCROGGS pg. 18 (lines 8-11):** What Pre-construction activities were deferred? Is there project cost or scheduling impact(s). Please describe.

**SCROGGS pg. 25 (lines 9-10):** "...routine update to FPL executive management.." – is that schedule driven or on an as-needed basis, or both?

**SCROGGS pg. 32 (lines 1-3):** Concentric has reviewed the project for six consecutive years. Is it time for "new blood". Is Concentric "too familiar"...and if not, why not?

**SCROGGS pg. 32 (lines 22-23) & pg. 33 (lines 1-3):** Project costs incurred in 2013 were \$28.7M, which was \$549,227 less than the May 1<sup>st</sup> filing estimate of \$29.3M. Please describe the savings.

**SCROGGS pg. 33 (lines 18-19):** Was any portion of the \$111,273 LICENSING overspend a result of FPL failure to comply or having to redo previous work?

**SCROGGS pg. 34 (lines 15-17):** Was any portion of the \$200,609 PERMITTING overspend a result of FPL failure to comply or having to redo previous work?

**SCROGGS pg. 33 & 34:** Please describe why LICENSING and PERMITTING are separate /distinct.

**SCROGGS; SDS-2 (pgs. 1-8):** Please identify those federal, state, local, and foreign authorizations that are still outstanding, and a status update on each.



## ***9. Interview Summaries***

## Bureau of Performance Analysis Interview Summary

Florida Power & Light Company 2014 Nuclear Controls Review Auditors: Rich, Hallenstein	Interview Number: File Name: 3.5.1 EPU IVS-1(Jones).doc
Name: Terry Jones, Steve Reuwer, Soria Talbot, Travis Contratto	Date of Interview: 04/03/14 Location: Juno Beach Headquarters 700 Universal Blvd. Telephone Number:

(1) Purpose of Interview: To provide an update of the Extended Power Uprate (EPU) Projects.

(2) Interview Summary:

Topics:

- General Project Overview & Closeout Overview
- Potential 2014 NCRC Costs/Requests
- 2013 EPU Project Budget
- 2013 Outages
- Licensing
- Contracts, Warranty Claims, and Concessions
- Closeout Activities
- Issues Resulting from Closeout
- Audits
- St. Lucie Steam Generator

\*EPU project completed in 2013

-126 MWe added. Total MWe is 522 MWe (FPL owner net share minus house loads.

-Total increase ins 545 MWe.

\*EPU is complete on both St. Lucie and Turkey Point projects.

\*2013 actual cost of \$250 million

-Estimated costs for 213 at \$260 million

\*April 2014 project cost estimate \$3.39 billion, down \$.0008 billion from 2013 cost estimate of \$3.398.

-Engineering and Construction \$3.12 billion plus \$.27 billion in AFUDC

\*PTN-4 outage completed on 4/17/2013

\*Project closeout activities are complete and no issues remain open. Activities include:

- Reduction of EPU project staff
- Engineering Change package closeouts
- Closeout related purchase orders and contracts
- Finalization of engineering documents
- Updating Final Safety Analysis Reports and Design Basis Documents
- Updating of drawings and calculations
- Closeout of all EPU related work orders
- Evaluate preventive maintenance requirements for new and modified components
- Develop preventive maintenance model work orders
- Complete and test control room simulator changes
- Completion of procedure revisions
- Identify and purchase spare parts
- Update training materials
- Complete EPU related action requests and condition reports
- Demobilization and restoration of site facilities
- Salvage recovery

\*One contract open to work on warranty issues.

\*NCRC clause

-According to FPL, there will be no project costs in 2014 that will be put through the clause.

-FPL is requiring a true-up of 2014 revenue requirements of about \$1.1 million

\*Budget

-FPL states 2013 actual cost of \$250 million less than 2013 actual/estimated cost of \$260. Savings achieved via EPU Capital construction costs.

**\*Outages**

- On March 12, 2013, PSL-1 automatically shut down due to a malfunction of the Main Steam Isolation Valve that was installed during the 2012 uprate.
- FPL repaired the damaged valves at a cost totaling approximately \$2.7 million.
- PSL-1 was returned to service 21 days later and operated in the uprate condition for 182 days until it was shut down for scheduled refueling in September 2013.
- April 2013, PTN-3 shut down to repair the steam generator feed water pumps that were installed as part of the EPU uprate.
- Cost of PTN-3 repair was approximately \$1.3 million.

**\*Overview of units in the uprate conditions**

- PSL-1
  - First start-up at EPU conditions in July 2012
  - Unit tripped on 3/12/13—reason: main steam isolation valve closure
  - Unit returned to service on 4/1/13
- PSL-2
  - First start-up at EPU conditions in Nov 2012
  - Operated at EPU conditions for 357 days in 2013 and continuously 62 days in 2014 until refueling outage.
- PTN-3
  - First start-up at EPU conditions in Sept 2012
  - Two outages in 2013:
    - Repair of reactor coolant pump seal (according to FPL, this was not EPU related)
    - Repair of steam generator feed water pumps (EPU related)
- PTN-4
  - First start-up at EPU conditions on 4/17/13
  - No Outages

**\*Licensing activities**

- Remove license conditions that were satisfied with EPU modifications, such as Control Room Habitability
- NRC – FPL to review time costs of FPL EPU License Amendment Request

**\*EPU Contracts**

- As of March 2013, 187 of 188 major contracts have been closed out.
- One contract remains open to resolve warranty claim-- contract open to pursue a warranty claim regarding the steam generator feed water pump failure.
- also pursued warranty claims regarding the Main Steam Isolation Valve malfunction in PSL-1.
- cost savings realized of approximately \$15.6 million in 2013 through concessions--- reductions in craft labor rates and daily living allowances, a freeze on subcontracted costs, lower project demobilization costs, and the elimination of incentives tied to performance.

**\*Audits (Confidential)**

- Six EPU related audits conducted by internal auditing
- Two project expenditure audits conducted by internal auditing

**\*Steam Generator Tube Inspection**

- According to FPL, EPU had no affect on team generator tubes
- NRC satisfied with inspection

(3) Conclusion: Project closeout completed in 2013 and no project costs in 2014 that will be put through the NCRC clause.

(4) Date Request(s) Generated:

(5) Follow-up Required:

Project Manager



## Bureau of Performance Analysis Interview Summary

Florida Power & Light Company  
2014 Nuclear Controls Review  
Auditors: Rich, Hallenstein

Interview Number: PTN6&7, IVS-1  
File Name:

Name: Steve Scroggs, Bill Maher, Steve Reuwer, Travis  
Contratto, Soria Talbot

Date of Interview: 04/03/14  
Location: Juno Beach Headquarters 700 Universal Blvd.  
Telephone Number:

(1) Purpose of Interview: To provide an update of the PTN 6&7 project status and discuss project key events

(2) Interview Summary:

**Topics:**

- General Project Overview & Status Update (FPL Presentation)
- Organization – structure changes 2013-to-present
- Organization – changes anticipated or planned for 2014
- Policies, practices, and procedures; updates and/or changes, 2013-to-present
- NRC review – Schedule update
- NRC review – Request for information (RAI)
- State application and licensing
- Local application and licensing
- 2013 project budget
- 2014 project budget
- Contracts greater than or equal to \$250K (2013-thru-present)
- Change orders greater than or equal to \$100K (2013-thru-present)
- Project timeline going forward
- Project cost going forward
- Long lead forging items
- Transmission
- Vendor update / issues / selection
- 2015-and-beyond
- “Off ramps” / decision points
- Pushback to vendors, warranty claims

Steve Scroggs stated that FPL remains committed to building PTN 6&7 “at the earliest practical time”. Licensing is “slower than anticipated but with continued forward momentum”.

He stated that 2013 and thus far into 2014 has been productive for the project, that it carried on the past pattern (of COLA prep) and sorting out land use/permitting issues. He characterized the year as one in which the “volume has gone down but the pace is still fast”. He compared the PTN6&7 team role as something like air traffic control – it’s all about timing and orchestration of many moving pieces or parts to the overall equation.

Scroggs stated that NRC COLA reviews are largely complete. The analysis of added site investigations was completed in April (2014) and an EIS drafting session is also scheduled for April (2014).

The Land Exchange Draft Environmental Impact States (DEIS) was published in January. The 60-day comment period ended in March. He hopes for the final EIS in the 3Q14 timeframe.

**NRC COLA:**

RAIs are essentially complete for pre-COLA stage. FPL submitted last (Safety) RAIs to NRC in April. Anticipates NRC revised COLA review schedule 3Q14 (Aug-Sep). FPL will then do a complete project schedule / budget review, revising as required. Alternative site issues are settled. (Draft) ACOE EIS anticipated pub in 4Q14. (Final EIS – FEIS – expected 4Q15)

**ARMY CORPS OF ENGINEERS (ACOE):**

Notice of 404b application anticipated 4Q14. (Final) ACOE EIS expected 4Q15. Wetland permit would follow in 2016.

**(FL) SITE CERTIFICATION:** Siting Board meets 05/13/14. Site Certification expected. There is a 6-7 day admin process before



certification, then a 30-day appeal period. Municipalities indicate they will appeal. Probably take 12-18 months for appeals to work through the courts. (Notice must be in FAW NLT 04/22/14 to meet the 05/13/14 anticipated date) Eight weeks of hearings follow. Strong recommended order (RO) to the Governor / Cabinet (ALJ to DEP). Municipalities filed 285 exceptions.

#### **LAND EXCHANGE:**

FEIS – the advisory document - to be published Oct2014. Record of decision expected in December – this is the execution document. Land exchange to be executed 12/14 – 01/15.

**ORGANIZATIONAL CHANGES:** (Scroggs said that changes support NRC and pre-construction milestones)  
2013 - New Nuclear (PTN6&7) was aligned to Nuclear Division in early 2013, to align project under Chief Nuclear Officer, who has responsibility for NRC interaction. There were no position changes associated with the alignment.  
2014 - Steve Reuwer brought in from EPU, leads development of an execution plan (cost, schedule, vendors) is now VP-Construction

#### **NRC SCHEDULE REVIEW:**

Public meetings in 2013 – four for Safety, four for Environment  
Remains under review – FPL says all outstanding issues are either resolved or on schedule for resolution. The company maintains “continuous interaction” with the NRC and Corps management. They believe a revised schedule is “imminent” but do not know a date.  
Safety Review – Analysis of 2013 site investigation to be submitted 04/14. They believe their submission meets NRC expectations.  
Environmental Review – NRC/ACOE indicated to FPL all National Environmental Protection Act (NEPA) issues are complete.  
There is a drafting meeting April 8<sup>th</sup> and FPL expected ‘straggler questions’ to pop up  
FPL has had a weekly call with the NRC project POC. Personnel turnover at NRC hasn’t helped. Mr. Maher has had drop-ins or scheduled meetings with the head of New Reactors. Mano Nazar and Bill Maher to see the NRC Deputy Director on April 14<sup>th</sup>.

#### **PROJECT COSTS:**

Cost estimate continues to be based on 2007 estimated range. FPL claims it remains consistent with the 2010 check, escalated for the current year. The company will conduct a complete schedule / cost review upon publication of the NRC’s revised COLA review schedule (expected later this year). Until then, the official cost estimate is the current one, though Mr. Scroggs conceded that will almost certainly change upon review. He could not estimate the amount of change of the final project cost range.

Project total cost range remains consistent with prior years and based on a 2022/2023 COD. Mr. Scroggs also admitted that the 2022/2023 timeline is very likely going to change based on the revised NRC COLA Review Schedule.

For project costing, the total project cost split is assumed by FPL to be 60-percent Unit 6 (the first to be built), 40-percent Unit 7. Tongue in cheek, FPL opines that “actual results may vary”

FPL stated that their cost estimate range has remained consistent and conservative throughout the project’s history.

The RO (Recommended Order) supports the project and features consistent with FPL’s original project plan. There would be no additional project incremental costs to relocate the reclaimed water treatment facility (RWTF). The potential West *consensus* transmission corridor contained in the stipulation is within 10-percent of the West *preferred* corridor cost. Municipality proposal to bury the US-1 230kV line was discounted in the RO – cost was \$250M +/-.

#### **PROJECT SCHEDULE FACTORS:**

FPL believes that schedule predictability will *increase* at 2014 goes on, when NRC published a revised COLA Review schedule. COLA review schedule is a **CRITICAL PATH** item .

**COLA Schedule:** there will be a milestone schedule published for publication of staff reviews and public comment. This may not be required if final item is dismissed. Potential challenge from Waste Confidence (predicated on NLT 10/03/14 publication of the rule and GEIS), seismic reviews, Spent Fuel Pool rulemaking, and new construction monitoring. FPL can be effected by it but cannot influence any of it.

**ACOE Notification and Least Environmentally Damaging Practicable Alternative (LEDPA) Review:** Will publish notification with the Draft EIS. Will conduct a LEDPA Analysis on all sites.

**Siting Board Determination and (possible) Appeal:** Project to be on Siting Board agenda end-April. Certification to be issued 7 days later, followed by 30-day appeal period. Appeals through 1<sup>st</sup> District Court could require 12-18 months. Makes end-2015 possible before site certification, if appealed.

**Land Exchange Execution and Acquisition Activities:** By end-2014 best case. Final EIS to be published, followed by Record



of Decision (ROD) 30 days later. Potential NEPA challenge could delay it. The Exchange Agreement would be executed after ROD. FPL estimates 3 years of acquisition activities, to include clearance of federal environmental 'encumbrances'. They say it is a 3-year project end to end but later in the project so not a critical path item.

**MORE ON THE RECOMMENDED ORDER (RO):**

- Recommends corridors supporting interconnection
- All corridors presented in the hearing were suitable for certification
- Analysis split between eastern 230kV and western combined lines (two 500kV, one 230kV)
- US-1 route is preferred over the eastern alternative (which is supported by Coral Gables, Pinecrest, and South Miami). FPL pointed out that the eastern alternative does not actually go through Coral Gables, Pinecrest, and South Miami...but, rather, through Little Havana where power poles would, literally, have to be in front yards.
- West consensus corridor (WCC) is preferred by FPL if available in a timely manner – 3 years and reasonable cost (+10-percent of option). FPL's West Preferred Corridor to be certified as a backup in case WCC cannot be developed.
- WCC only works if federal encumbrances on SFWMD land and easements on other government property are relocated.
- FPL believes its flexibility on transmission line siting supported favorable RO without leading to additional costs

**OTHER PROJECT DEVELOPMENTS:**

- NCRC amendment changes insert new milestones to pre-construction and construction activities. FPL opines this may impact some pre-construction activities and add time.
- Lessons learned from monitoring other AP1000 projects
- Pace of pre-construction contract negotiations / vendor selection has been altered (no contract by 3Q14 as earlier anticipated)

2013 Year End actual spend was 2% below the actual/estimated budget of \$29.2M. Actual was \$28.7M. COLA and SCA costs were greater than projected (\$0.7M and \$1.1M respectively), while ENC (\$0.7M) and Contingency (\$1.7M) were under budget. FPL claims that project management tools enabled active, responsive management.

2014 Project cost to be revised in May filings – original estimated was \$17.1M. Current estimate is \$20.4M  
- Project categories are currently running ahead of projections: COL (\$1.3M), SCA (\$1.6M), ENC (\$0.2M).

Remaining licensing phase cost estimates: \$13M in 2015 and \$10M in 2016.

**Underground Injection Control (UIC)** - Exploratory well completed in 2013. Converted to an operating well in early 2014. Well flow test completed in Feb 2014, with positive results – well has capacity above requirement and permit (7000 gal/minute for 8 hrs). Maintenance activities required to keep permit valid – ongoing. Additional 12 wells to be built when construction begins. Takes about 6 months to drill each one and each to be tested using similar process. FPL stated that the successful demonstration of UIC reduces uncertainty in future licensing and construction processes.

**Construction Contract** - An EPC (or EP and C) decision has not been made – **no longer on track for late 2014**. Scroggs stated that as they gain more certainty we will make the decision as to when the EC or EPC option would be ready to move forward. He further stated that the land use and zoning decisions would lead the company closer to the decision of when to build. Budget estimate remains unchanged but FPL will do a timeline/budget estimate review when the NRC puts out a revised COLA schedule, anticipate by end-2014. Until then, the current timeline and budget estimate are the official ones for use and public consumption.

**Long Lead Forgings** - agreement extended again to 10/31/14. Another extension is expected after that; FPL says it will reengage the vendor once the company has more predictability in the schedule going forward. FPL still has \$10.8M at risk, holding the forging slot. Should they decline to exercise the slot; the company will lose all or some of that money.

**Contracts \$250K or more / Change Orders \$100K or more** – See DR responses; no changes since those responses.

**Bechtel Warranty Claims** – See DR responses; no changes since those responses.

(3) Conclusion:

(4) Date Request(s) Generated:

(5) Follow-up Required:

Project Manager

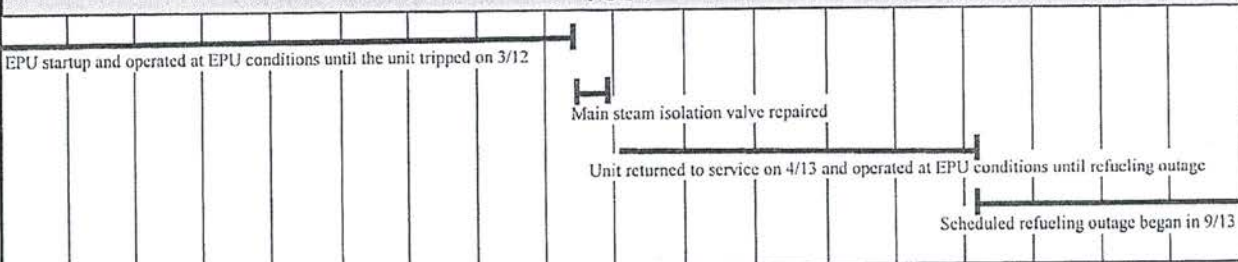


## ***10. Miscellaneous***

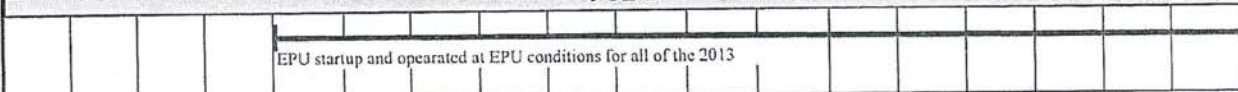
## NUCLEAR OPERATIONS UNDER UPRATE CONDITIONS

Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2012	2012	2012	2012	2012	2012	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013

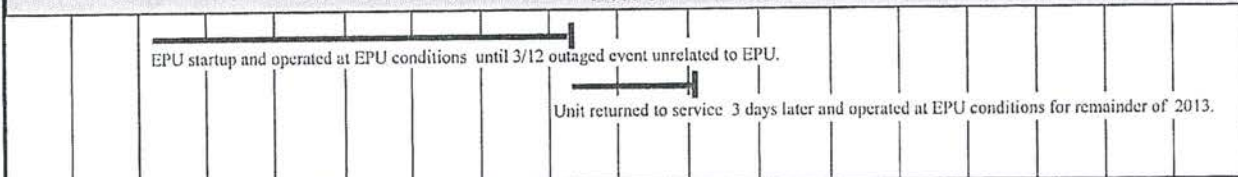
### PSL-1



### PSL-2

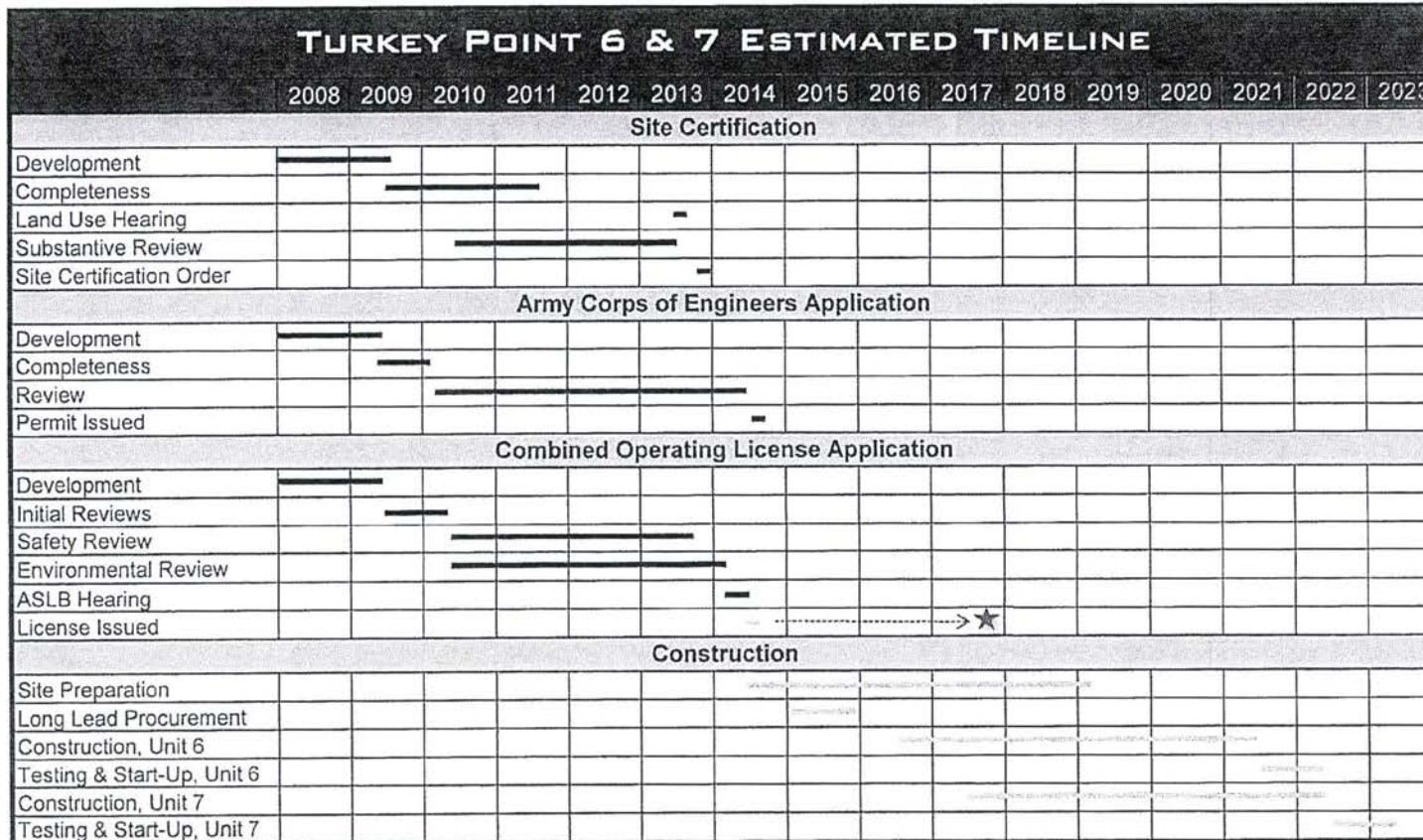


### PTN-3

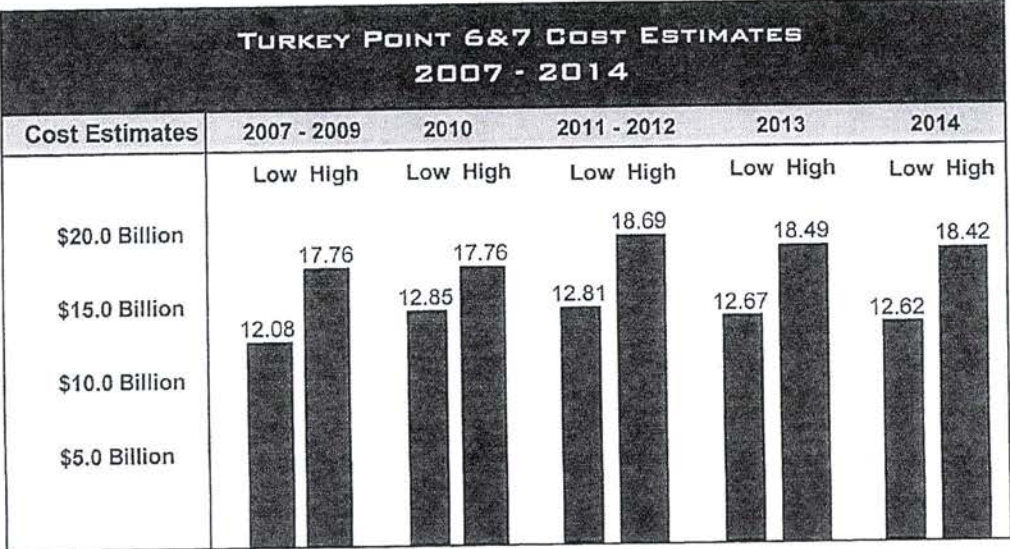


### PTN-4









# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**Exhibit C**  
**Florida Power and Light Company**  
**Staff Audit Work Papers for Audit Report PA-14-01-001**  
**Docket No. 140009-EI**

Document	Description	Page Number(s)	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
Staff Audit Work Papers	Review of Florida Power and Light Company's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects 2014	1-44, 46-56, 58-90, 92-94, 97-102, 106-107, 110-124, 127-131, 135-147	N			
	DR 3 EPU	Pg. 45, 57	Y	Line 1	(d)(e)	Stephanie Castaneda
	DOCUMENT SUMMARIES AND CONTROL LOGS DRs 1.1 - 1.33 EPU	Pg. 91	Y	Line 1	(d)(e)	Stephanie Castaneda
		Pg. 95	Y	Lines 1-7	(b)	Antonio Maceo
			Y	Lines 8-9	(d)(e)	Stephanie Castaneda
		Pg. 96	Y	Lines 1-2	(d)(e)	Stephanie Castaneda
		Pg. 103	Y	Lines 1-11	(b)	Antonio Maceo
		Pg. 104	Y	Lines 1-35	(b)	Antonio Maceo
		Pg. 105	Y	Lines 1-2	(b)	Antonio Maceo
		Pg. 108	Y	Lines 1-28	(b)	Antonio Maceo
		Pg. 109	Y	Lines 1-16	(b)	Antonio Maceo
	DOCUMENT SUMMARIES AND CONTROL LOGS DRs 1.1 – 1.47 PTN 6&7	Pg. 125	Y	Lines 1-5	(d)(e)	Martin Cox
		Pg. 126	Y	Lines 1-6	(d)(e)	Martin Cox



Document	Description	Page Number(s)	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
	INTERVIEW SCHEDULE	Pg. 132	Y	Line 1	(d)(e)	Stephanie Castaneda
		Pg. 133	Y	Lines 1-7	(b)	Antonio Maceo
				Lines 8-10	(d)(e)	Stephanie Castaneda
		Pg. 134	Y	Lines 1-2	(d)(e)	Stephanie Castaneda
				Lines 3-5	(b)	Antonio Maceo

**EXHIBIT D**

**AFFIDAVITS**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost )  
Recovery Clause )

DOCKET NO. 140009-EI

STATE OF FLORIDA )  
 )  
PALM BEACH COUNTY )

AFFIDAVIT OF MARTIN COX

BEFORE ME, the undersigned authority, personally appeared Martin Cox who, being first duly sworn, deposes and says:

1. My name is Martin Cox. I am currently employed by Florida Power & Light Company ("FPL") as Senior Nuclear Cost Analyst, Nuclear Project Controls PTN 6&7. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information contained in FPSC Staff audit work papers for Audit Report PA-14-01-001, for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including information concerning bids or contractual data and information related to competitive interests. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

*Martin Cox*  
\_\_\_\_\_  
Martin Cox

SWORN TO AND SUBSCRIBED before me this 4th day of September 2014, by Martin Cox, who is personally known to me or who has produced \_\_\_\_\_ (type of identification) as identification and who did take an oath.

*Elizabeth Carrero*  
\_\_\_\_\_  
Notary Public, State of Florida

My Commission Expires:





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost )  
Recovery Clause )

DOCKET NO. 140009-EI

STATE OF FLORIDA )  
 )  
PALM BEACH COUNTY )

AFFIDAVIT OF STEPHANIE CASTANEDA

BEFORE ME, the undersigned authority, personally appeared Stephanie Castaneda who, being first duly sworn, deposes and says:

1. My name is Stephanie Castaneda. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Nuclear Business Operations, Fleet Accounting & Regulatory Compliance. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information contained in FPSC Staff audit work papers for Audit Report PA-14-01-001, for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including information concerning bids or contractual data and information related to competitive interests. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

  
Stephanie Castaneda

SWORN TO AND SUBSCRIBED before me this 4<sup>th</sup> day of September 2014, by Stephanie Castaneda, who is personally known to me or who has produced N/A (type of identification) as identification and who did take an oath.

  
Notary Public, State of Florida

My Commission Expires:



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost )  
Recovery Clause )

DOCKET NO. 140009-EI

STATE OF FLORIDA )  
MIAMI-DADE COUNTY )

AFFIDAVIT OF ANTONIO MACEO

BEFORE ME, the undersigned authority, personally appeared Antonio Maceo who, being first duly sworn, deposes and says:

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Auditing. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of information contained in FPSC Staff audit work papers for Audit Report PA-14-01-001, for which I am identified on Exhibit C as the affiant. The documents or materials that I have reviewed contain information related to reports of internal auditors. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may affect the effectiveness of the Internal Auditing department itself. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

  
Antonio Maceo

SWORN TO AND SUBSCRIBED before me this 4 day of September 2014, by Antonio Maceo who is personally known to me or who has produced \_\_\_\_\_ (type of identification) as identification and who did take an oath.

  
Notary Public, State of Florida

My Commission Expires:

