

EXHIBIT "C"

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06638 JUL 29 8

FPSC-COMMISSION CLERK

Exhibit C - Part I
Company: FLORIDA POWER AND LIGHT COMPANY
Title: List of Confidential Workpapers
Workload Control No.: PA-08-01-002, Nuclear Uprate Review
DOCKET NO. 080009 EI

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
1		Report	Y	Page 20 last 2 lines, Page 21 first 7 lines		(d), (e)	William P. Labbe, Jr.
2	DR - 1.1.a	Provide current copies of all project planning documents for Turkey Point and St. Lucie uprate projects	Y	560-581	All	(e)	William P. Labbe, Jr.
3	DR - 1.3.a	Please provide current copies of all contractor evaluation and quality assurance documents for the Turkey Point and St. Lucie uprate projects.	Y	0905-0912	All	(d), (e)	William P. Labbe, Jr.
4	DR - 1.3.b	Please list and describe the contractor evaluation and quality assurance documents and/or systems used to assess contract compliance, work completion and quality assurance for the Turkey Point and St. Lucie Uprate projects.	Y	0905-0912	All	(d), (e)	William P. Labbe, Jr.
5	DR - 1.7.b	Please provide copies of all Board of Directors meeting minutes that pertain to the Turkey Point and St. Lucie uprate projects.	Y	1007-1015	All	(a)	William P. Labbe, Jr.
6	DR - 1.8.a	Provide a list of all internal or external audits of purchasing or competitive bidding for nuclear unit contracts and components conducted over the period 2005-2007.	Y	1017	All	(b)	William P. Labbe, Jr.
7	DR - 1.8.b	Provide a list of all such audits planned for the period 2008-2010.	Y	1017	All	(b)	William P. Labbe, Jr.
8	DR - 2.1	Provide NP 1100 and NAP 705 procedures.	Y	1022-1051	All	(e)	William P. Labbe, Jr.
9	DR - 2.2	Please provide Budget control sheets discussed with Bill Labbe.	Y	1052-1054	All	(e)	William P. Labbe, Jr.
10	DR - 2.3	Provide the EPU Executive Steering Committee report packages, January 14, 2008 through May 30, 2008 (when available) and associated "takeaway task lists."	Y	1055-1280	All	(d), (e)	William P. Labbe, Jr.
11	DR - 2.4	EPU Project Steering Committee report packages, March 17, 2008 through May 30, 2008 (when available) and associated	Y	1281-1382	All	(d), (e)	William P. Labbe, Jr.

DOCUMENT NUMBER-DATE

06638 JUL 29 08

FPSC-COMMISSION CLERK

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
		"takeaway task lists."					
12	DR - 2.5	Provide Turbine/ generator proposals for EPU presented by Mitsubishi, Toshiba, and Alston.	Y	2203-2655	All	(d)	William P. Labbe, Jr.
13	DR - 2.6	Provide EPU Staffing Plan (through 2009) mentioned by Bill Labbe.	Y	1383-1386	All	(e)	William P. Labbe, Jr.
14	DR - 2.7	Provide September 2007 feasibility study by Stone and Webster.	Y	1387-1397	All	(a), (d)	William P. Labbe, Jr.
15	DR - 2.8	Provide Turkey Point and St. Lucie Balance of Plant EPU Scoping Study by Shaw Stone & Webster.	Y	1474-2201	All	(d)	William P. Labbe, Jr.
16	DR - 2.9	Provide the Report packages from weekly Thursday Project Controls meeting.	Y	1398-1440	All	(d), (e)	William P. Labbe, Jr.
17	DR - 2.12	Provide the Copies of responses to FPSC Financial Audit document requests 1 through 4 (Kathy Welch).	Y	3567-3662, 3663-3732, 3749-4179, 4446-5325, 5349-5909	All	(d), (e)	William P. Labbe, Jr.
18	DR - 2.13	Provide the March 17, 2007 EPU Project Steering Committee meeting backup presentation.	Y		See response 2-4		William P. Labbe, Jr.
19	DR - 3.1a	Please provide current copies of all project planning documents for Turkey Point Units 6 and 7.	Y	6166-6216, 6218, 6222, 6224-6, 6227-6385	All	(e)	Steven D. Scroggs
20	DR - 3.2a	Please provide current copies of all project management documents for Turkey Point Units 6 and 7.	Y	6398-6511, 6512-3, 6514-6535, 6392-4, 6536-6545	All	(e)	Steven D. Scroggs
21	DR - 3.3a	Please provide current copies of all contractor evaluation and quality assurance documents for the Turkey Point Units 6 and 7 projects.	Y	6549-6839	All	(d)	Steven D. Scroggs
22	DR - 3.3b	Please list and describe the contractor evaluation and quality assurance documents and/or systems used to assess contract	Y	6549-6839	All	(d)	Steven D. Scroggs

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
		compliance, work completion and quality assurance for the Turkey Point 6 and 7 projects.					
23	DR - 3.5	Provide copies of the purchasing, bidding, and contracting procedures applicable to the Turkey Point Unit 6 and 7 projects.	Y	6852-6924	All	(d)	Steven D. Scroggs
24	DR - 3.7a	Please list and describe all reporting mechanisms used to provide project status reports and updates to company management, corporate Board of Directors and joint owners.	Y	7157-7174	All	(e)	Steven D. Scroggs
26	DR - 3.11a	Please provide a description of the status of service and/or materials contracts for Turkey Point Units 6 and 7. Please include descriptions of any negotiations that have not yet resulted in bids or contracts.	Y	7932-8788	All	(d)	Steven D. Scroggs
27	DR - 3.11b	Please provide copies of all executed service and/or materials contracts and addendums for Turkey Point Units 6 and 7.	Y	7932-8788	All	(d)	Steven D. Scroggs
28	DR - 3.11c	Please provide copies of all sole-source or single-source justification explanations for any applicable Turkey Point Units 6 and 7 contracts.	Y	7932-8788	All	(d)	Steven D. Scroggs
29	DR - 3.12	Please provide copies of any RFPs issued by FPL for Units 6 and 7 and any , RFP responses, bids or proposals received from potential contractors or suppliers.	Y	Pages 1-190	All	(d)	Steven D. Scroggs
30	DR - 3.13	Please provide a description and timeline of planned 2008 Turkey Point 6 and 7 activities, events, work and milestones.	Y	6217-6218, 6222, 6224-6226	All	(e)	Steven D. Scroggs
31	DR - 3.16	Please explain what caused the Nuclear Uprate Economic Analysis capital costs to increase by \$83.1 million at Turkey Point and \$106.7 million for St. Lucie on June 19th . (response to DR-1.1a, pg. 1 of 8)	Y	2662	All	(d), (e)	William P. Labbe, Jr.
32	DR - 3.17	Please explain why St. Lucie Unit 2 will go through three scheduled outages (Spring 2009, Fall 2010 and Spring 2012), as described in section 3.1 of the St. Lucie Units 1 and 2 EPU Feasibility Report and Recommendations, before receiving the power increase benefits from the uprate, while Unit	Y	2663	All	(c)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsection	Affiant
		1 will accomplish the uprate in two scheduled outages. (DR-1.1a, pg. 6 of 8)					
33	DR - 3.18	Please provide a copy of the Shaw Stone & Webster Turkey Point EPU Study, which describes how the scaled up parameters for Beaver Valley Units 1&2 at 2689 MWt and Surry Units 1&2 component sizes are comparable to the Turkey Point Units. (response to DR-1.1a, pg. 1 of 9, SS&W Executive Summary)	Y		Was provided in #8, DR - 2		William P. Labbe, Jr.
34	DR - 3.19	Please provide a current status of each risk item, and its costs, identified on pages 4-8 in the Shaw Stone & Webster BOP Risk Assessment. (response to DR-1.1a, pg. 4-8 SS&W Executive Summary)	Y		Was provided in #8, DR - 2		William P. Labbe, Jr.
35	DR - 3.22	Provide copies of daily quality reports issued for Turkey Point and St. Lucie uprates to date. (Kundulkar interview)	Y	2677-2712	All	(d), (e)	William P. Labbe, Jr.
36	DR - 3.24	Please provide the prioritized equipment lead time schedule for the St. Lucie and Turkey Point uprates, if not already provided. (Kundulkar interview)	Y	2714-2720	All	(d), (e)	William P. Labbe, Jr.
37	DR - 3.25	Provide copies of Weekly Project Scheduling updates for the uprates to-date, if not already provided. (Kundulkar interview)	Y	2721-3451	All	(c), (e)	William P. Labbe, Jr.
38	DR - 3.26a	Please describe what caused the loss of 11 days and \$14 million in the Fall of 2007, at Turkey Point Unit 3, as described in the Siemens 2007 Scorecard.	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.
39	DR - 3.26b	Please describe any penalties assessed to Siemens as a result of the delays at Unit 3.	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.
40	DR - 3.26c	What portion, if any, of the \$14 million increased costs did FPL incur?	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.
41	DR - 3.26d	Please describe any actions and activities taken by FPL against Siemens to assure similar delays do not occur during the EPU uprates.	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.
42	DR - 3.26e	Explain any actions FPL has taken against Siemens for its bad safety record, shown in the Vendor Scorecard for June through	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
		October 2007.					
43	DR - 3.26f	Please explain what actions FPL has taken against Siemens for the poor rating for Q1&Q2, and bad rating in Q3&Q4, during the nuclear refueling outage of 2007.	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.
44	DR - 3.26g	How does FPL assess its risk in using Siemens for the EPU uprates as a result of the 2007 Vendor Performance Scorecard? (response to DR-1.3b)	Y	3452-3453	All	(d), (e)	William P. Labbe, Jr.
45	DR - 3.27	Provide all scorecard and other written evaluations, on nuclear vendors used in the Turkey Point and St. Lucie uprates, for the period 2006-2008 to date. (response to DR-1.3b)	Y	3454	See 1.3b	(d), (e)	William P. Labbe, Jr.
46	DR - 3.28	Provide a copy of all handouts and presentation materials used for the Annual Joint Owners Meetings for St. Lucie Unit 2. (response to DR-1.7a)	Y	3455-3472	All	(d), (e)	William P. Labbe, Jr.
47	DR - 3.29	Please provide copies of the Monthly Operating Report, and meeting minutes, for 2006 to-date unless already provided. (response to DR-1.7a)	Y	3473-3476	All	(d), (e)	William P. Labbe, Jr.
48	DR - 4.1	Copy of DR 7&8 from Kathy Welch re: Nustart.	Y	6142, 6146, 6149-6155	All	(e)	Steven D. Scroggs
49	DR - 4.2	Copy of DR 6-3 from Kathy Welch Request	Y	5947-5958	All	(c), (e)	William P. Labbe, Jr.
50	DR - 4.4a	Provide major BOP long-lead equipment milestones.	Y	3480-3483	All	(d), (e)	William P. Labbe, Jr.
51	DR - 4.4d	Provide invoice checklist approval form.	Y	3565-3566	All	(d), (e)	William P. Labbe, Jr.
52	DR - 5.2	The following questions pertain to the unplanned replacement of the electric generator at Turkey Point Unit 3 during 2007. f.) Please provide the original cost for the generator rotor (including installation), the depreciated value at the time of replacement, and the associated cost of removal. g.) Please provide the cost of the new generator rotor and associated installation cost. i.) Please provide the estimated	Y	Pages 3 - 67	All	(d), (e)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
		<p>future costs for replacing and installing the generator rotor again, during the EPU project, and the estimated useful life of the new rotor to be installed during the EPU project.</p> <p>j.) Provide all Nuclear Condition Reports related to the electric generator component replacements during the 2007 Turkey Point Unit 3 outage.</p>					
53	DR - 5.3	<p>Based on the FPL response to DR-3.26, please provide the following additional information:</p> <p>a.) Please provide the total number of days for the Unit 3 outage described in FPL's response to DR- 3.26a, the days of delay caused by Siemens, the days of delay caused by weather, and the number of days for the performance testing of the generator.</p> <p>b.) Was the 11 day extension documented in the report-card an extension of Siemens' work period, or was it an extension of the total critical path length of the outage?</p> <p>c.) Please breakdown and describe the derivation of the \$14 million in estimated costs associated with Siemens' delay.</p> <p>d.) Please describe the corrective actions taken by FPL, and provide a copy of the improvement plan developed and implemented by FPL and Siemens as a result of the Unit 3 event, and mentioned in the response to DR-3.26e.</p> <p>e.) Describe fully what the senior management of both FPL and Siemens did to resolve performance issues, as referenced in the response to DR-3.26f.</p>	Y	Pages 1 - 105	All	(d), (e)	William P. Labbe, Jr.
54	DR - 5.4	c.) Provide any Nuclear Condition Reports (or plant condition reports) completed for Siemens work during the period 2006-2008.	Y		See DR 5.2J		William P. Labbe, Jr.
55	DR - 5.9	Please provide a copy of all completed 2008 monthly	Y	Pages 1 - 4		(e)	Steven D. Scroggs

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
		dashboard reports to management for units 6 & 7.					
56	DR - 5.11	<p>Please provide the following information regarding the audits reviewed by staff at FPL's General Offices on May 6, 2008:</p> <p>a.) When is the subsequent Internal Audit investigation planned for the St. Lucie Plant Purchasing Investigation of 12/12/06?</p> <p>b.) Please state what level of risk FPL assigns to the inability of PASSPORT to restrict access to POs of designated users, which may have a possible conflict of interest, as described in the Nuclear Contractor Conflict of Interest Investigation Audit of 3/6/06.</p> <p>c.) In response to the Invensys Systems Investigation of 10/4/07:</p> <p>1. Did Nuclear Management reiterate the assessment of Condition Reports, such that the objectivity of writers and reviewers cannot be questioned by December 31, 2007?</p> <p>2. If not, when will this be completed?</p> <p>3. What actions did management take to accomplish this objective?</p> <p>4. Did Nuclear and Sourcing management identify and review applicable policies and procedures, make revisions, and communicate them to employees by Decembe</p>	Y	Pages 1 - 2	All	(b)	William P. Labbe, Jr.
57	DR - 5.12	<p>a.) Please provide copies of internal audits completed during the period 2006-2008 on all other FPL/FPLE nuclear uprates.</p> <p>b.) Please provide the scheduled Uprate Cost Project Accounting audit when completed in June 2008.</p> <p>c.) Please provide the scheduled ISC Procurement audit, expected to start in 3Q 2008, once completed.</p>	Y	Pages 1 - 10	All	(b)	William P. Labbe, Jr.
58	DR - 5.13	<p>a.) Please provide all Transmission studies completed for the uprates and new Units 6&7.</p> <p>b.) Please provide the anticipated</p>	Y	All Files Contained on CD	All	(c), (d), (e)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statute 366.093 (3) Subsection	Affiant
		future completion dates for any incomplete Transmission studies for the uprates and Units 6&7.					
59	DR - 5.19	Please provide the company's response to Kathy Welch's DR - 6.2, requesting the company internal transform study.	Y	Pages 1 - 20	All	(a), (c), (e)	William P. Labbe, Jr.
60	DR - 6.2	<p>a. Please list and briefly describe any "lessons learned" from FPL Group/FPLE nuclear unit uprates that have been incorporated into the planning, design or implementation of the St. Lucie and Turkey Point uprates.</p> <p>b. Please indicate for each of the nuclear unit uprates mentioned in 2.a., whether the project was completed on schedule and within budget.</p> <p>c. Please provide the original cost estimate and the final completed cost for each of FPL Group/FPLE previous unit uprate projects listed in 2.a.. If applicable, provide a brief description of why completion costs exceeded the estimate(s).</p> <p>d. Please provide the original expected increase in MW power and the final realized power increase for each of FPL Group/FPLE previous unit uprate projects listed in 2.a..</p>	Y	Pages 1 - 2	All	(a), (b), (c), (d), (e)	William P. Labbe, Jr.
61	DR - 6.3	c. to the extent not previously provided in a document request response, please provide copies of all Uprate bid evaluations and contracts of \$1,000,000 or more that have been awarded to date. d. Please provide copies of all written justifications for sole/single source selection of contractors for all Uprate contracts of \$1,000,000 or more, not previously provided, that have been awarded to date.	Y	Pages 1 - 15	All	(d), (e)	William P. Labbe, Jr.
62	DR - 7.2	<p>a. Please provide the initial FPL cost estimates to complete the uprates for St. Lucie Units 1&2 and Turkey Point units 3&4.</p> <p>b. Please provide FPL's subsequent cost estimate changes</p>	Y	Pages 1 - 9	All	(d), (e)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Bate # / Page #	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
		to complete the uprates for St. Lucie Units 1&2 and Turkey Point units 3&4, with an explanation of the cost changes. c. Please provide FPL's current budget estimate to complete the uprates for St. Lucie Units 1&2 and Turkey Point units 3&4.					
63	DR - 7.3	Please provide a summary chart of the nuclear uprates completed by FPL, FPL Group, and FPLE, including the plant and units uprated, type of uprate completed, uprate outage duration by year, project completion date, total uprate MW improvement, and final cost of the uprate project.	Y	Pages 1 - 15	All	(a), (d), (e)	William P. Labbe, Jr.

Exhibit C - Part II
Company: FLORIDA POWER AND LIGHT COMPANY
Title: Interviews
Workload Control No.: PA-08-01-002, Nuclear Uprate Review
DOCKET NO. 080009 EI

Item	Title	Interview Topic	Conf Y/N	Interview Number	Line No./Col. No.	Florida Statue 366.093 (3) Subsec tion	Affiant
1		Understand FPL's management structure for the New Nuclear Units 6&7 at Turkey Point	Y	7	Section (2), Line 7	(d), (e)	Steven D. Scroggs
2		Understand FPL's management structure for the New Nuclear Units 6&7 and the potential use of affiliated employees in the organization	Y	9	Section (2) (b)	(d), (e)	Steven D. Scroggs
3		Understand FPL's bidding, purchasing and contracting processes and discuss contractor evaluation and quality assurance	Y	11	Sections (2) (d), (2) (e), (3) (d), (3) (e)	(d), (e)	William P. Labbe, Jr.
4		Understand the processes and controls for Supply Chain operations in the new nuclear units 6 & 7	Y	14	Section (2) (b), (2) (e) line 2, (3) (b)	(d), (e)	Steven D. Scroggs

Exhibit C - Part III

Company: FLORIDA POWER AND LIGHT COMPANY

Title: Workpapers and Document Control Logs (DR 1-7), Workplan, and staff prepared analysis from documents

Workload Control No.: PA-08-01-002, Nuclear Uprate Review

DOCKET NO. 080009 EI

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Page #	Section	Florida Statue 366.093 (3) Subsec tion	Affiant
1	DR - 1.1.a	Provide current copies of all project planning documents for Turkey Point and St. Lucie uprate projects	Y	2	a	(e)	William P. Labbe, Jr.
2	DR - 1.3.b	Please list and describe the contractor evaluation and quality assurance documents and/or systems used to assess contract compliance, work completion and quality assurance for the Turkey Point and St. Lucie Uprate projects.	Y	3-4	a, b, c	(d), (e)	William P. Labbe, Jr.
3	DR - 1.7.b	Please provide copies of all Board of Directors meeting minutes that pertain to the Turkey Point and St. Lucie uprate projects.	Y	5	a	(a)	William P. Labbe, Jr.
4	DR - 1.8.a	Provide a list of all internal or external audits of purchasing or competitive bidding for nuclear unit contracts and components conducted over the period 2005-2007.	Y	5	b	(b)	William P. Labbe, Jr.
5	DR - 1.8.b	Provide a list of all such audits planned for the period 2008-2010.	Y	5	c	(b)	William P. Labbe, Jr.
6	DR - 2.1	Provide NP 1100 and NAP 705 procedures.	Y	6-7	All	(e)	William P. Labbe, Jr.
7	DR - 2.2	Please provide Budget control sheets discussed with Bill Labbe.	Y	7	All	(e)	William P. Labbe, Jr.
8	DR - 2.3	Provide the EPU Executive Steering Committee report packages, January 14, 2008 through May 30, 2008 (when available) and associated "takeaway task lists."	Y	7-8	All	(d), (e)	William P. Labbe, Jr.
9	DR - 2.4	EPU Project Steering Committee report packages, March 17, 2008 through May 30, 2008 (when available) and associated "takeaway task lists."	Y	9	a, b	(d), (e)	
10	DR 2-5	Provide Turbine/ generator	Y	9-10	c, d	(d)	William

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Page #	Section	Florida Statue 366.093 (3) Subsec tion	Affiant
		proposals for EPU presented by Mitsubishi, Toshiba, and Alston.					P. Labbe, Jr.
11	DR - 2.6	Provide EPU Staffing Plan (through 2009) mentioned by Bill Labbe.	Y	11	a	(e)	William P. Labbe, Jr.
12	DR - 2.7	Provide September 2007 feasibility study by Stone and Webster.	Y	12-13	All	(a), (d)	William P. Labbe, Jr.
13	DR - 2.8	Provide Turkey Point and St. Lucie Balance of Plant EPU Scoping Study by Shaw Stone & Webster.	Y	12	All	(d)	William P. Labbe, Jr.
14	DR - 2.9	Provide the Report packages from weekly Thursday Project Controls meeting.	Y	12-13	All	(d), (e)	William P. Labbe, Jr.
15	DR - 2.12	Provide the Copies of responses to FPSC Financial Audit document requests 1 through 4 (Kathy Welch).	Y	13-14	All	(d), (e)	William P. Labbe, Jr.
16	DR - 3.1a	Please provide current copies of all project planning documents for Turkey Point Units 6 and 7.	Y	36	a	(e)	Steven D. Scroggs
17	DR - 3.2a	Please provide current copies of all project management documents for Turkey Point Units 6 and 7.	Y	37	a	(e)	Steven D. Scroggs
18	DR - 3.16	Please explain what caused the Nuclear Uprate Economic Analysis capital costs to increase by \$83.1 million at Turkey Point and \$106.7 million for St. Lucie on June 19th . (response to DR-1.1a, pg. 1 of 8)	Y	38	All	(d), (e)	William P. Labbe, Jr.
19	DR - 3.17	Please explain why St. Lucie Unit 2 will go through three scheduled outages (Spring 2009, Fall 2010 and Spring 2012), as described in section 3.1 of the St. Lucie Units 1 and 2 EPU Feasibility Report and Recommendations, before receiving the power increase benefits from the uprate, while Unit 1 will accomplish the uprate in two scheduled outages. (DR-1.1a, pg. 6 of 8)	Y	38-39	All	(c)	William P. Labbe, Jr.
20	DR - 3.18	Please provide a copy of the Shaw Stone & Webster Turkey Point EPU Study, which describes how the scaled up parameters for Beaver Valley Units 1&2 at 2689 MWt and	Y	39	All		William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Page #	Section	Florida Statute 366.093 (3) Subsection	Affiant
		Surry Units 1&2 component sizes are comparable to the Turkey Point Units. (response to DR-1.1a, pg. 1 of 9, SS&W Executive Summary)					
21	DR - 3.19	Please provide a current status of each risk item, and its costs, identified on pages 4-8 in the Shaw Stone & Webster BOP Risk Assessment. (response to DR-1.1a, pg. 4-8 SS&W Executive Summary)	Y	39	a		William P. Labbe, Jr.
22	DR - 3.24	Please provide the prioritized equipment lead time schedule for the St. Lucie and Turkey Point uprates, if not already provided. (Kundulkar interview)	Y	40	a	(d), (e)	William P. Labbe, Jr.
23	DR - 3.26a	Please describe what caused the loss of 11 days and \$14 million in the Fall of 2007, at Turkey Point Unit 3, as described in the Siemens 2007 Scorecard.	Y	40	All	(d), (e)	William P. Labbe, Jr.
24	DR - 3.26b	Please describe any penalties assessed to Siemens as a result of the delays at Unit 3.	Y	41	All	(d), (e)	William P. Labbe, Jr.
25	DR - 3.26c	What portion, if any, of the \$14 million increased costs did FPL incur?	Y	41	All	(d), (e)	William P. Labbe, Jr.
26	DR - 3.26d	Please describe any actions and activities taken by FPL against Siemens to assure similar delays do not occur during the EPU uprates.	Y	41	All	(d), (e)	William P. Labbe, Jr.
27	DR - 3.26e	Explain any actions FPL has taken against Siemens for its bad safety record, shown in the Vendor Scorecard for June through October 2007.	Y	41	All	(d), (e)	William P. Labbe, Jr.
28	DR - 3.26f	Please explain what actions FPL has taken against Siemens for the poor rating for Q1&Q2, and bad rating in Q3&Q4, during the nuclear refueling outage of 2007.	Y	41-42	All	(d), (e)	William P. Labbe, Jr.
29	DR - 3.26g	How does FPL assess its risk in using Siemens for the EPU uprates as a result of the 2007 Vendor Performance Scorecard? (response to DR-1.3b)	Y	42	All	(d), (e)	William P. Labbe, Jr.
30	DR - 3.27	Provide all scorecard and other written evaluations, on nuclear vendors used in the Turkey Point and St. Lucie uprates, for the	Y	42	a	(d), (e)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Page #	Section	Florida Statue 366.093 (3) Subsec tion	Affiant
		period 2006-2008 to date. (response to DR-1.3b)					
31	DR - 3.28	Provide a copy of all handouts and presentation materials used for the Annual Joint Owners Meetings for St. Lucie Unit 2. (response to DR-1.7a)	Y	42-43	b, c, d	(d), (e)	William P. Labbe, Jr.
32	DR - 3.29	Please provide copies of the Monthly Operating Report, and meeting minutes, for 2006 to-date unless already provided. (response to DR-1.7a)	Y	43	e	(d), (e)	William P. Labbe, Jr.
33	DR - 4.1	Copy of DR 7&8 from Kathy Welch re: Nustart.	Y	15	a	(e)	Steven D. Scroggs
34	DR - 4.4a	Provide major BOP long-lead equipment milestones.	Y	16	a	(d), (e)	William P. Labbe, Jr.
35	DR - 5.2	The following questions pertain to the unplanned replacement of the electric generator at Turkey Point Unit 3 during 2007. f.) Please provide the original cost for the generator rotor (including installation), the depreciated value at the time of replacement, and the associated cost of removal. g.) Please provide the cost of the new generator rotor and associated installation cost. i.) Please provide the estimated future costs for replacing and installing the generator rotor again, during the EPU project, and the estimated useful life of the new rotor to be installed during the EPU project. j.) Provide all Nuclear Condition Reports related to the electric generator component replacements during the 2007 Turkey Point Unit 3 outage.	Y	17-18	All	(d), (e)	William P. Labbe, Jr.

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36	DR - 5.3	<p>Based on the FPL response to DR-3.26, please provide the following additional information:</p> <p>a.) Please provide the total number of days for the Unit 3 outage described in FPL's response to DR- 3.26a, the days of delay caused by Siemens, the days of delay caused by weather, and the number of days for the performance testing of the generator.</p> <p>b.) Was the 11 day extension documented in the report-card an extension of Siemens' work period, or was it an extension of the total critical path length of the outage?</p> <p>c.) Please breakdown and describe the derivation of the \$14 million in estimated costs associated with Siemens' delay.</p> <p>d.) Please describe the corrective actions taken by FPL, and provide a copy of the improvement plan developed and implemented by FPL and Siemens as a result of the Unit 3 event, and mentioned in the response to DR-3.26e.</p> <p>e.) Describe fully what the senior management of both FPL and Siemens did to resolve performance issues, as referenced in the response to DR-3.26f.</p>	Y	18	All	(d), (e)	William P. Labbe, Jr.
37	DR - 5.4	c.) Provide any Nuclear Condition Reports (or plant condition reports) completed for Siemens work during the period 2006-2008.	Y	18-19	All		William P. Labbe, Jr.
38	DR - 5.9	Please provide a copy of all completed 2008 monthly dashboard reports to management for units 6 & 7.	Y	20	a	(e)	Steven D. Scroggs
39	DR - 5.11	<p>Please provide the following information regarding the audits reviewed by staff at FPL's General Offices on May 6, 2008:</p> <p>a.) When is the subsequent Internal Audit investigation planned for the St. Lucie Plant Purchasing Investigation of 12/12/06?</p> <p>b.) Please state what level of risk FPL assigns to the inability of</p>	Y	21	All	(b)	William P. Labbe, Jr.

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43	DR - 6.2	<p>a. Please list and briefly describe any "lessons learned" from FPL Group/FPLE nuclear unit uprates that have been incorporated into the planning, design or implementation of the St. Lucie and Turkey Point uprates.</p> <p>b. Please indicate for each of the nuclear unit uprates mentioned in 2.a., whether the project was completed on schedule and within budget.</p> <p>c. Please provide the original cost estimate and the final completed cost for each of FPL Group/FPLE previous unit uprate projects listed in 2.a.. If applicable, provide a brief description of why completion costs exceeded the estimate(s).</p> <p>d. Please provide the original expected increase in MW power and the final realized power increase for each of FPL Group/FPLE previous unit uprate projects listed in 2.a..</p>	Y	25-26	All	(a), (b), (c), (d), (e)	William P. Labbe, Jr.
44	DR - 6.3	<p>c. to the extent not previously provided in a document request response, please provide copies of all Uprate bid evaluations and contracts of \$1,000,000 or more that have been awarded to date. d. Please provide copies of all written justifications for sole/single source selection of contractors for all Uprate contracts of \$1,000,000 or more, not previously provided, that have been awarded to date.</p>	Y	26	All	(d), (e)	William P. Labbe, Jr.
45	DR - 7.2	<p>a. Please provide the initial FPL cost estimates to complete the uprates for St. Lucie Units 1&2 and Turkey Point units 3&4.</p> <p>b. Please provide FPL's subsequent cost estimate changes to complete the uprates for St. Lucie Units 1&2 and Turkey Point units 3&4, with an explanation of the cost changes.</p> <p>c. Please provide FPL's current budget estimate to complete the uprates for St. Lucie Units 1&2 and Turkey Point units 3&4.</p>	Y	27	a	(d), (e)	William P. Labbe, Jr.

Item	Document Request Number Referenced	Document Title & Purpose of Review	Conf. Y/N	Page #	Section	Florida Statue 386.093 (3) Subsection	Affiant
46		FPL Turkey Point New Units Contract Summary	Y	29-35	a-h	(d), (e)	William P. Labbe, Jr., Steven D. Scroggs
47		FPL Proposed Uprate Expansion of Nuclear Power Plants	Y	44-46	All	(d), (e)	William P. Labbe, Jr., Steven D. Scroggs
48		Project Controls Review	Y	47	All	(d), (e)	William P. Labbe, Jr.