

October 23, 2003

MEMORANDUM TO: Allen G. Howe, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Eva A. Brown, Project Manager, Section 2 */RA/*
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: TURKEY POINT PLANT, UNITS 3 AND 4 - SUMMARY OF TELEPHONE
CONFERENCE CALLS REGARDING CLARIFICATIONS TO THE CASK
AREA RACK AMENDMENT REPLIES (TAC NO. MB6909 AND MB6910)

On September 17 and 21 and October 1, 2003, the U.S. Nuclear Regulatory Commission (NRC) staff held telephone conference calls with Florida Power and Light Company (FPL or the licensee) representatives regarding an amendment request concerning storage of fuel in the cask area of the spent fuel pool (SFP) at Turkey Point Plant, Units 3 and 4. The NRC staff sought several clarifications regarding the licensee's reply dated September 8, 2003 [Agency Documents Access and Management System (ADAMS) Accession No. ML012690632 to the NRC's requests for additional information (RAIs) transmitted in a letter dated July 18, 2003 [ADAMS Accession No. ML031990542]].

Topics discussed during the September 17 conference call included clarifications to RAI #10a, regarding the administrative controls on diving in the SFP during the positioning of the cask racks. The NRC staff was concerned with the level-of-control (information or reference) for the procedural steps and the adequacy of the steps meant to protect a diver from large doses from the adjacent fuel. The licensee indicated that its existing procedure needed improvement and would be revised. Additionally, the licensee stated that the reply to RAI #10a would be revised to reflect the increased level-of-control and improved dose prevention steps for the procedure.

During the September 21 conference call, the adequacies of the administrative controls regarding properly aligning the cask area rack, as well as the current licensing basis with regards to Title 10 to the *Code of Federal Regulations* (10 CFR) Part 50 Section 68 and Part 70 Section 24, were discussed. The licensee clarified the reply to RAI #13. FPL's Turkey Point plants are currently licensed to 10 CFR 70.24, but have adopted many of 10 CFR 50.68-like provisions in a previous amendment approved by the staff. The licensee indicated that this submittal would result in the adoption of 10 CFR 50.68 in its entirety. The licensee addressed the administrative controls regarding cask rack orientation partially in RAI # 23. The NRC staff indicated that misorientation of the rack had the potential to create an accident previously unanalyzed and the licensee should provide a description of the definitive measures taken to ensure that possibility of misorientation of the cask rack was minimized. The licensee stated that hold points would be added to the procedure which would require an individual from the Quality Control group to confirm that the cask rack had been properly oriented before proceeding with loading the cask rack with fuel. Additionally, the NRC staff requested that FPL provide a formal commitment to include the requirements of the hold points in the cask rack

installation procedure. The NRC staff discussed its intention to make the inclusion and implementation of the holdpoint as a condition of approval in the Safety Evaluation. The condition is deemed necessary to ensure that the licensee will adequately develop, implement, and maintain positive controls over the orientation of the cask rack.

On October 1, the NRC staff discussed with FPL the replies to RAI's #25 and #27. The NRC staff requested clarification of some information referencing the Updated Final Safety Analysis Report by the licensee in RAI #25. As the NRC staff had no additional concerns with this reply, Question 1 on the attached was removed from the list of clarifications requested. The NRC staff also requested clarification to the reply to RAI #27, regarding the specifics on how the cask drop analysis originally performed is consistent with Appendix A to NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants." The licensee indicated that they would submit the information needed to support the licensee's reply to RAI #27. One other issue regarding the condition of the SFP liner after a cask drop was discussed. The licensee indicated that the condition of the liner would be specified in the clarification,

Those clarification questions transmitted to the licensee via e-mail are attached. The NRC staff did not identify any other issue that required further discussion.

Docket Nos. 50-250 and 50-251

Attachment: As stated

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CLARIFICATIONS TO REPLY TO
REQUEST FOR ADDITIONAL INFORMATION
CASK AREA RACK AMENDMENT
TURKEY POINT PLANT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251

1. Provide a discussion on the source term used to calculate the exclusion area boundary thyroid and whole body dose numbers contained in Table 14.2.1-5.
2. In the September 8, 2003, RAI reply letter, the reply to RAI #27 refers to a previously reviewed cask drop analysis back in the 1976 timeframe. This analysis is the justification that spent fuel pool integrity will be maintained. Discuss how the 1976 cask drop analysis conforms to Appendix A of NUREG-0612.
3. During a cask drop accident, discuss whether the liner will be preserved.