



OCT 3 0 2003

L-2003-239
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D. C. 20555

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Spent Fuel Pool Cask Area Rack Amendment
Clarification on RAI Response to NRC Questions 10a and 23

By letter L-2002-214 dated November 26, 2002, Florida Power and Light (FPL) submitted a proposed license amendment to add a spent fuel rack to each unit's spent fuel pool cask area. By letter L-2003-213, dated September 8, 2003 FPL submitted the response to the Request for Additional Information (RAI) for the Addition of Spent Fuel Pool Cask Area Rack Amendment. The responses provided for Questions # 10a and # 23 were discussed with the NRC Staff in a telephone conference on September 17, 2003.

The purpose of this letter is to provide a revised response for RAI Question #10a and clarification to the response for RAI Question # 23. Attachment 1 provides the response to RAI Question # 10a, which supercedes in its entirety, the response provided in L-2003-213. Attachment 2 clarifies FPL's response to RAI Question # 23 by stating its commitment to Quality Control (QC) hold points in the procedure to verify correct cask area rack orientation. The original No Significant Hazards Determination remains valid with the information provided within.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee for the State of Florida.

Should there be any questions on this letter, please contact Walter Parker at (305) 246-6632.

Sincerely,

T. O. Jones
Vice President
Turkey Point Plant

SM

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point
W. A. Passetti, Florida Department of Health

A001


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STATE OF FLORIDA)
)ss.
COUNTY OF MIAMI-DADE)

Terry Jones being first duly sworn, deposes and says:


That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.


Terry O. Jones

Subscribed and sworn to before me this

30 day of October, 2003.



Name of Notary Public (Type or Print)



Terry O. Jones is personally known to me.

- 10 a. The submittal notes that use of divers is not anticipated during the proposed rack installation. However, in the event that divers are needed, what procedural controls will be implemented to ensure that divers maintain a safe distance from any high and very high radiation sources in the pool. Guidance regarding procedural controls is provided in Regulatory Guide 8.38, "Control Of Access To High And Very High Radiation Areas In Nuclear Power Plants", Appendix A, "Procedures For Diving Operations In High and Very High Radiation Areas."

Response:

- a. It is FPL policy that the use of divers is a last resort that must be justified from an ALARA perspective. If divers are necessary, the radiological controls will be administered under plant procedure 0-HPS-052.10, "Radiological Controls for Diving Operations", which is consistent with the guidance provided in Regulatory Guide 8.38, Appendix A. Under this procedure, appropriate controls will be established, such as a physical barrier (e.g. cage) to prevent the diver from approaching adjacent storage racks. Also, to further reduce the dose rate and risk of high exposure, adjacent racks would be emptied of stored fuel to the extent possible. In addition to a physical barrier that prevents access to adjacent fuel storage areas, the plant will temporarily install warning barricades to alert workers that they have traveled out of the approved dive area. In addition, the rack vendor has a contingency procedure to govern any diver operations, should divers become necessary. The vendor procedure will be reviewed by the Plant Nuclear Safety Committee prior to use.

Clarification to the Response for RAI Question #23

Introduction

The installation procedure for the Turkey Point cask area racks will include Quality Control (QC) hold points. The purpose of the QC hold points will be to verify the racks (one per unit) are correctly oriented by compass direction both before and after their installation in each unit's spent fuel pool. Correct rack orientation is mandatory because one of the four rack sides does not contain Boral neutron-absorbing panels, and the rack criticality analysis requires that the side without Boral panels must face the east pool wall. Because of the rack's rectangular shape and size, it is physically possible to install the rack in either of two rack orientations in the spent fuel pool, 180 degrees apart. Hereafter, these two orientations are referred to as the 'correct' and the 'backward' orientations. The rack is not allowed to be installed in the backward orientation because the rack side without Boral panels would then face other fuel storage racks instead of the pool wall, invalidating the rack criticality analysis.

Correct Rack Orientation

See Figures 1 and 2 on the following page for the correct rack orientation in the Unit 3 and Unit 4 spent fuel pools, respectively.

Note that on both units, the rack face with no Boral panels faces the east pool wall; the notched (excluded) corner cell is adjacent to the east pool wall; and the rack nameplate is on the north rack face.

Description of QC Hold Points

The rack installation procedure QC hold points will require an authorized QC inspector to independently verify and sign the procedure at two different times (before and after rack installation) that the rack is correctly oriented. Orientation will be determined by comparing physical rack features with specific compass directions, as described below. At each hold point, QC signoff will be required before the rack installation will be allowed to continue.

Two QC hold points will be included in each unit's installation procedure. The hold points take the form of a boxed note inserted between procedure steps similar to:

QC HOLD POINT

Level I or higher QC Inspector (any discipline) shall:

- Verify the proper completion of Steps xxx and yyy*
- Sign Data Sheet X in space provided*

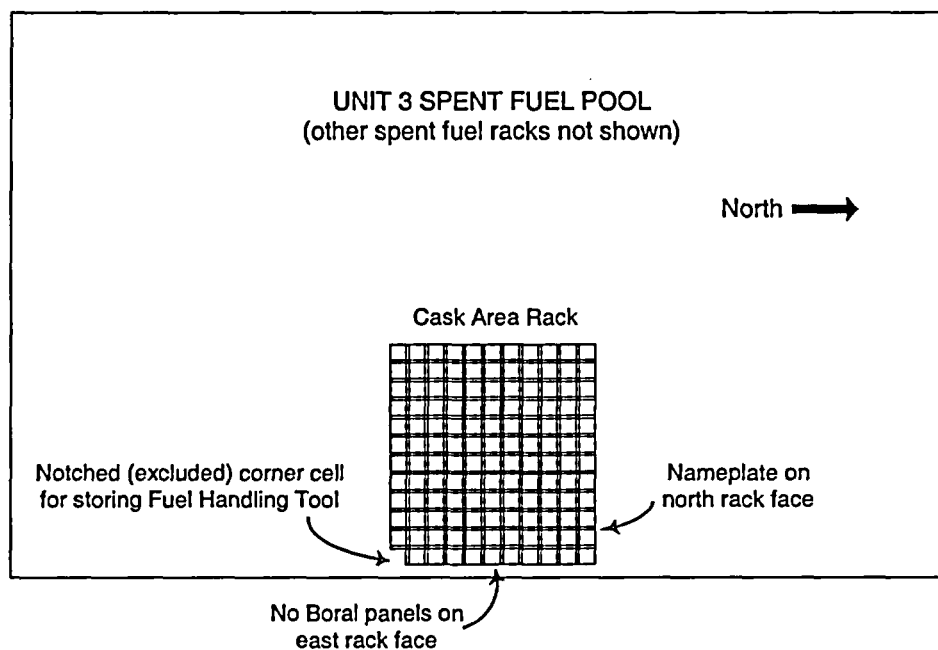


Figure 1
Correct Unit 3 Rack Orientation

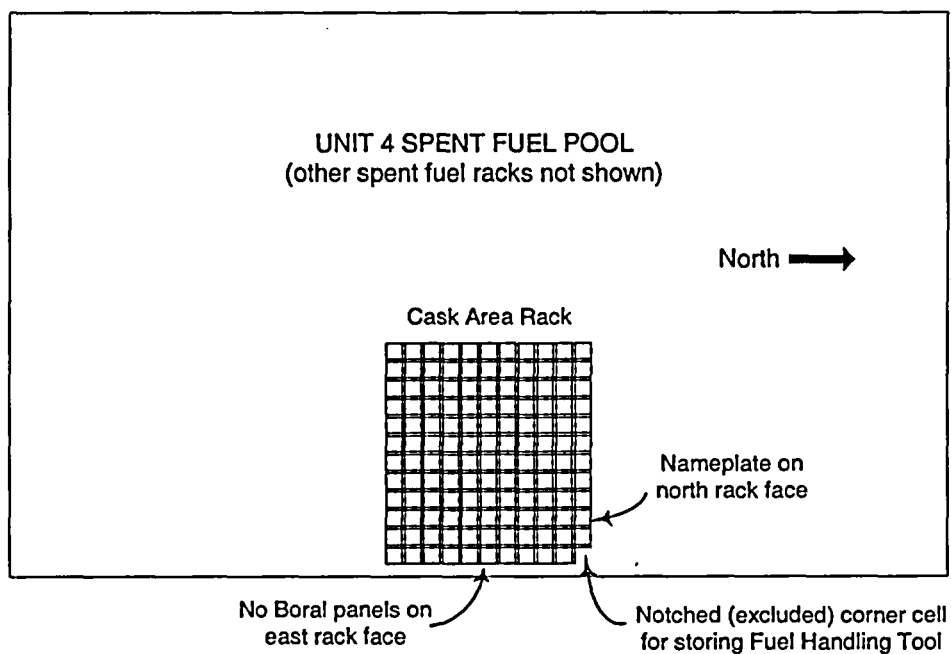


Figure 2
Correct Unit 4 Rack Orientation

Description of QC Hold Points (continued)

The two QC hold points will include instructions similar to the following:

1. Prior to rack installation, the rack will be staged out-of-doors east of the appropriate unit's Auxiliary Building L-shaped door under the cask handling crane. A QC hold point will require verification of the following steps:

- With the cask area rack on the leveling pad located under the cask handling crane, verify that the rack nameplate is facing north (the nameplate is located near the top of the north rack face, near the northeast corner).
- Verify that the nameplate reads "Turkey Point Unit 3". ["Unit 4" in the Unit 4 procedure]
- Verify that the notch (excluded cell) in the rack corner is in the southeast corner of the Unit 3 rack. [northeast corner of the Unit 4 rack]

With these three conditions met, the rack is correctly oriented for installation. The cask crane and rack lifting rig will maintain the correct orientation during rack lifting, transfer through the L-shaped door, and lowering into the spent fuel pool cask area.

2. Following rack installation in the spent fuel pool cask area, a QC hold point will require verification of the following step:
 - Verify by visual observation that the notch (excluded cell) is adjacent to the east pool wall, in the southeast corner of the Unit 3 rack. [northeast corner of the Unit 4 rack]

Satisfying each QC hold point will be indicated by a QC inspector signature and date on a data sheet in the procedure.

The second QC hold point (confirmation of the notched cell along the east wall) provides positive proof that the rack is installed in the correct orientation. If the rack were backwards, the missing cell would not be visible along the wall, and no storage location would be available for the fuel handling tool.

Identifying the commitment in the procedure

In addition to the QC hold points, a precaution statement will be added to the Precautions/Limitations section of the rack installation procedure identifying the hold points as a plant licensing commitment and referencing the appropriate FPL or NRC letter that includes the commitment.