

August 27, 2007

Mr. J. A. Stall  
Senior Vice President, Nuclear and  
Chief Nuclear Officer  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, FL 33408-0420

SUBJECT: TURKEY POINT PLANT, UNITS 3 AND 4 - RESPONSE TO GENERIC  
LETTER 2003-01, *CONTROL ROOM HABITABILITY* (TAC NOS. MB9866  
AND MB9867)

Dear Mr. Stall:

The Nuclear Regulatory Commission (NRC) acknowledges that Florida Power and Light Company (FPL), the licensee for the Turkey Point Plant, Units 3 and 4, provided responses to Generic Letter (GL) 2003-01, *Control Room Habitability*, by letters dated August 11, October 8, December 9, 2003, and August 14, 2007. This letter provides a status of the licensee's response to GL 2003-01 with regard to Turkey Point.

The GL requested that licensees confirm their control room(s) meet the design bases (e.g., General Design Criteria [GDC] 1, 3, 4, 5, and 19, draft GDC, or principal design criteria), with special attention to: (1) Determination of the most limiting unfiltered and/or filtered leakage into the control room and comparison to values used in the licensees' design bases for meeting control room operator dose limits from accidents (GL 2003-01, Item 1a); 2) Determination that the most limiting unfiltered leakage is incorporated into the hazardous chemical assessments (GL 2003-01, Item 1b); and (3) Determination that reactor control capability is maintained in the control room, or at the alternate shutdown location, in the event of smoke (GL 2003-01, Item 1b). The GL further requested information on any compensatory measures in use to demonstrate control room habitability (CRH), and plans to retire them (GL 2003-01, Item 2).

FPL reported the results of ASTM E741 (American Society for Testing Materials, *Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution*) tracer gas tests for the Turkey Point Plant, Units 3 and 4, control room, which is common for both units and pressurized for accident mitigation.

The licensee determined that the tested value for leakage into the Control Room Envelope (CRE) was 0 standard cubic feet per minute (scfm), which is less than the value of 10 scfm assumed for control room ingress and egress in the design basis radiological dose analyses for CRH.

The licensee for Turkey Point indicated that unfiltered leakage into the CRE is not specifically incorporated into the hazardous chemical assessment because toxic gases are not considered to be a threat based on hazard screening performed on chemicals stored onsite or transported nearby. The licensee also indicated that reactor control capability is maintained from either the control room or the alternate shutdown panel in the event of smoke.

The GL further requested that licensees assess their Technical Specifications (TS) to determine if they verify the integrity of the CRE, including ongoing verification of the inleakage assumed in the design-basis analysis for CRH, and in light of the demonstrated inadequacy of a delta ( $\Delta$ ) P measurement to alone provide such verification (GL 2003-01, Item 1c) as permitted by the GL. The licensee provided a schedule for revising the surveillance requirement in the TS to reference an acceptable surveillance methodology. In a December 9, 2003, letter, the licensee indicated that it would implement a CRH program including periodic assessments and inleakage testing based on the guidance contained in Nuclear Energy Institute document NEI 99-03. In an August 14, 2007, letter the licensee indicated that it would submit a license amendment request (LAR) to adopt the changes recommended in Technical Specification Task Force Traveler 448 (TSTF-448), as applicable, by September 30, 2008.

The information the licensee provided supported the fact that there are no compensatory measures needed to be in place to demonstrate CRH. The information the licensee provided also supported the conclusion that the Turkey Point Plant is committed to meet draft GDC regarding CRH.

Based on the information provided above, and your commitment to submit an LAR to adopt TSTF-448, as applicable to Turkey Point Plant, the NRC staff considers your response to GL 2003-01 to be complete, and no further action is requested of you at this time.

If you have any questions, please contact me at (301) 415-2020 or at [blm@nrc.gov](mailto:blm@nrc.gov).

Sincerely,

**/RA/**

Brenda L. Mozafari, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

cc: See next page

The GL further requested that licensees assess their Technical Specifications (TS) to determine if they verify the integrity of the CRE, including ongoing verification of the inleakage assumed in the design-basis analysis for CRH, and in light of the demonstrated inadequacy of a delta ( $\Delta$ ) P measurement to alone provide such verification (GL 2003-01, Item 1c) as permitted by the GL. The licensee provided a schedule for revising the surveillance requirement in the TS to reference an acceptable surveillance methodology. In a December 9, 2003, letter, the licensee indicated that it would implement a CRH program including periodic assessments and inleakage testing based on the guidance contained in Nuclear Energy Institute document NEI 99-03. In an August 14, 2007, letter the licensee indicated that it would submit a license amendment request (LAR) to adopt the changes recommended in Technical Specification Task Force Traveler 448 (TSTF-448), as applicable, by September 30, 2008.

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If you have any questions, please contact me at (301) 415-2020 or at blm@nrc.gov.

Sincerely,

/RA/

Brenda L. Mozafari, Senior Project Manager  
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Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

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