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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co. 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co. 05000251
 AUTH. NAME: UHRIG, R. E. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Light Water Reactors Branch 1

SUBJECT: Provides addl info re costs of limiting containment purges during high power operations. Util attempting to resolve issues raised in NRC 781128 ltr. Combined containment purges in interim to be limited to 200-h per year.

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 TITLE: Containment Purging

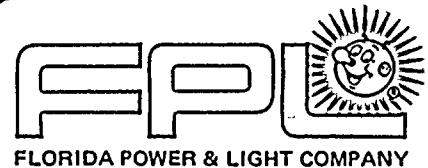
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June 8, 1979
L-79-158

Office of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

REGULATORY DOCKET FILE COPY

Dear Mr. Schwencer:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Containment Purging

Your letter of November 28, 1978 provided guidance concerning containment purging during normal operation. In our letter to you of February 1, 1979, we indicated that we planned to justify unlimited purging, and that we would continue our practice of minimizing purges. Our letter went on to say that an excessive restriction on containment purges would have a negative effect on the working environment in the containment.

The purpose of this letter is to provide additional information regarding the costs associated with limiting containment purges. This letter also provides more information on our plans for final resolution of this issue. Since the potential consequences of a postulated loss of coolant accident (LOCA) are mitigated at low power level and shutdown conditions, we have concentrated on limiting containment purges during high power operations.

The containment purge history for calendar year 1978 for Turkey Point Units 3 and 4 was:

<u>> .2% Power</u>	<u>< 2% Power > 200°F</u>	<u>< 200°F</u>
225 Hours	722 Hours	2260 Hours

We have reviewed the purge history for Turkey Points Units 3 and 4, and based on this review we have concluded that elimination of containment purges with primary system temperature greater than 200°F would result in an estimated eight additional days of shutdown time per unit per year. A limitation of containment purges to 90 hours per unit per year above 200°F would result in an estimated 4-5 days additional shutdown time, while a limitation of 90 hours per unit per year at power would result in an estimated 1-2 days of shutdown time. Estimated down time is largely a function of the maintenance activity to be performed. The above estimates assume certain maintenance activities can be performed at temperature and at power without a purge of containment. However, some maintenance can only be performed at temperature with a purge. Should the frequency of such maintenance be greater than our predictions, which are

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based on 1978 experience, then the outage time could be significantly increased. A single shutdown and cooldown to deal with a problem which would otherwise be corrected at power, would add at least one additional day of lost generation time. Fossil fuel used to generate replacement electricity while Turkey Point is off-line costs \$300,000 - \$400,000 a day.

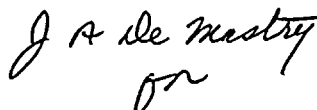
The containment entries made at power without containment purges would require that our personnel work in exceedingly high temperatures and humidity. Since these working conditions also reduce productivity, more time and more personnel would be required for each job. A higher man-rem total for each job would result. We estimate this increase in man-rem to be on the order of two to three times that associated with a purge. This is due primarily to the increased time and people involved. Total man-rem would also increase significantly in the event that we develop a higher percentage of failed fuel than we are currently experiencing. Another consequence of reduced purge time would be a loss of flexibility to handle problems which might develop during operation.

We are pursuing several alternatives for final resolution of the issues raised in your letter of November 28, 1978. We will be meeting with the valve manufacturer this week, along with our consultants, to further evaluate resolution of this issue. In addition, we are analyzing the effect of valve closure time on ECCS performance, and radiological consequences. We plan to have these analyses completed by October 1, 1979.

Until our analyses and any necessary plant modifications have been completed, we will limit our combined containment purges for Turkey Point Units 3 and 4 during power operation (>2% power) to 200 hours per year for the site (200 hours total for both units). In order to allow promulgation of the appropriate instructions to our employees, and to be consistent with other record keeping requirements, this requirement will be implemented beginning July 1, 1979.

We will keep you informed of our progress in this matter. Please feel free to contact me if you should have any question.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU:GDW:cf

cc: James P. O'Reilly, Region II
Robert Lowenstein, Esquire

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