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(2 PAGES)

September 26, 1979
L-79-273

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
191 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII: JPD
5D-250, 5D-251
IL Bulletin 79-14

CARBON COPIES: BOB COMPTON
JOHN DYER

FROM: G. D. WHITTIER
(FPL-MIAMI) (305) 552-4826

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B. B. KENYA
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A. E. MURPHY
I. T. SUTHERLAND
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Lewis
A. Gib.
Compt.
Dyer

Florida Power & Light Company submits this letter for Turkey Point Units 3 and 4 in response to the subject Bulletin. Inspections, subsequent evaluations, and reanalysis (if required) are being performed for Turkey Point using our Architect/Engineer's generic program with certain modifications necessitated by plant specific details.

A total number of 366 isometrics and an estimated 2500 supports have been inspected on both units outside of containment. An estimated 247 isometrics and 1600 supports remain to be inspected for both units inside of containment.

An evaluation of approximately one-half of the isometrics outside of containment have been completed, with the result that only two non-conformances have been identified that had the potential for affecting operability. One case applied to the Unit 3 blowdown piping and was reported and corrected under the requirements of the Technical Specifications (Reportable Occurrence 250-79-26).

A second non-conformance potentially affecting operability of a system was found in evaluating the main steam atmospheric dump valve vent piping. (Corrective action has been developed and will be implemented by September 30, 1979). It involves a partial restraint downstream of one Unit 3 atmospheric steam dump valve (a non-safety related piping section). There are six configurations of this type on the steam dump system at Turkey Point (3 on each unit), but a deviation was found on only one of the six locations.

Since only two significant non-conformances have been identified on approximately half of the total piping runs, it is reasonable to expect a minimal number of significant non-conformances on the remaining piping systems. On Unit 4 at least one analysis has been reviewed in each system.

In accordance with your letter of August 22, 1979, we are renewing our August 2, 1979 (L-79-210) request to extend the inspection schedule for piping inside containment until the next scheduled outage of significant duration (about November 20, 1979 for Unit 3, and May, 1980 for Unit 4). This renewed request is based on the inspection program and results described above, plus the

additional justifying information given below

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Mr. James P. O'Reilly, Director, Region II
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The design seismic response spectra for Turkey Point Units 3 and 4 is extremely low, but has been conservatively amplified by a factor of three for the maximum earthquake piping response. This conservative approach combined with the use of .5% dampening provides for an ultra-conservative analysis when compared to present techniques.

The Turkey Point Plant has been safely operating for at least five years under normal operating loads and the contribution of seismic loads is small in comparison. It is highly improbable that a significant earthquake would occur before completion of the inspection. Preliminary results of a probabilistic acceleration study by our A/E support this position. If, during the remaining evaluations, any non-conformances are identified which would affect system operability, they will be corrected in accordance with the Technical Specifications.

Thus, the probability of a seismic event during the period of the requested extension is extremely small. Furthermore, it is our judgement that should a seismic event occur, the probability that a system necessary for a safe shutdown of the plant would fail to operate is also extremely small. For these reasons, Florida Power & Light Company has concluded that operation during the period of the requested extension will not pose a threat to the health and safety of the public, and that little additional benefit, if any, will be derived from an earlier inspection. On the other hand, significant costs will be incurred by our customers during the additional shutdown periods required only for an earlier inspection. These costs were discussed in our letter of August 2.

For the reasons given in this letter, Florida Power & Light Company has concluded that an extension is justified, and we request that you respond to our request by October 10, 1979.

We plan to submit our next status report by November 15, 1979. We will, of course, continue to keep the members of your staff apprised of our progress in the interim. Please feel free to call me if you have any questions regarding this matter.

Very truly yours,

Robert E. Uhrig
Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/GBW/PAS/paf

cc: Acting Director, Division of Operating Reactors
Robert Lowenstein, Esquire

Central Files

USNRC REGION II
ATLANTA, GEORGIA

P.O. BOX 529100, MIAMI, FL 33152



79 SEP 28 A 8:57

September 26, 1979
L-79-273

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII: JPO
50-250, 50-251
IE Bulletin 79-14

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A total number of 366 isometrics and an estimated 2500 supports have been inspected on both units outside of containment. An estimated 240 isometrics and 1600 supports remain to be inspected for both units inside of containment.

An evaluation of approximately one-half of the isometrics outside of containment have been completed, with the result that only two non-conformances have been identified that had the potential for affecting operability. One case applied to the Unit 3 blowdown piping and was reported and corrected under the requirements of the Technical Specifications (Reportable Occurrence 250-79-26).

A second non-conformance potentially affecting operability of a system was found in evaluating the main steam atmospheric dump valve vent piping. (Corrective action has been developed and will be implemented by September 30, 1979). It involves a partial restraint downstream of one Unit 3 atmospheric steam dump valve (a non-safety related piping section). There are six configurations of this type on the steam dump system at Turkey Point (3 on each unit), but a deviation was found on only one of the six locations.

Since only two significant non-conformances have been identified on approximately half of the total piping runs, it is reasonable to expect a minimal number of significant non-conformances on the remaining piping systems. On Unit 4 at least one analysis has been reviewed in each system, and overall, the deviations reviewed are representative of those found on both units.

In accordance with your letter of August 22, 1979, we are renewing our August 2, 1979 (L-79-210) request to extend the inspection schedule for piping inside containment until the next scheduled outage of significant duration (about November 20, 1979 for Unit 3, and May, 1980 for Unit 4). This renewed request is based on the inspection program and results described above, plus the additional justifying information given below.

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Mr. James P. O'Reilly, Director, Region II
Page 2

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The Turkey Point Plant has been safely operating for at least five years under normal operating loads and the contribution of seismic loads is small in comparison. It is highly improbable that a significant earthquake would occur before completion of the inspection. Preliminary results of a probabilistic acceleration study by our A/E support this position. If, during the remaining evaluations, any non-conformances are identified which would affect system operability, they will be corrected in accordance with the Technical Specifications.

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Very truly yours,

J A De Mastey
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Robert E. Uhrig
Vice President
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cc: Acting Director, Division of Operating Reactors
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