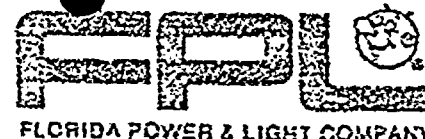


[Telecopy of original which is being mailed today, December 21, 1979.]



December 21, 1979

50-250



John F. Ahearne, Chairman  
Commissioner Victor Gilinsky  
Commissioner Richard T. Kennedy  
Commissioner Joseph M. Hendrie  
Commissioner Peter A. Bradford

Gentlemen:

Florida Power & Light Company understands that the Nuclear Regulatory Commission is considering issuing orders to FPL and other operators of nuclear units requiring them to shut down such units and complete installation of Category A "lessons learned" modifications prior to a specified date or dates unless such modifications have already been completed. FPL further understands that the Commission is considering fixing January 31, 1980, as the date for each of FPL's nuclear units. FPL can meet that date with respect to its Turkey Point Unit 3. However, for the reasons outlined below, FPL requests that the date for Turkey Point Unit 4 be made no earlier than February 15, 1980, and for St. Lucie Unit 1 no earlier than March 15, 1980.

FPL operates the electric utility system upon which large parts of the State of Florida, including the highly populous Southeast area, are dependent for service. Its three nuclear units supply a major portion of FPL's base load. More important, all three of the nuclear units are located in and supply the state's highly populous Southeast area. We have limited ability to import power into this area. Therefore, during periods of high peak demand only one nuclear unit can be shut down at a time without risking customer interruptions.

The period between January 1 and March 1 is a time of peak load upon the FPL's electrical generation due to cold weather heating requirements. Outage of any one of the nuclear units during that period significantly reduces needed reserves and requires that generation be supplemented by highly expensive oil which is imported from abroad. Outage of two nuclear units renders reserves unacceptable and seriously jeopardizes the ability of FPL to meet the projected winter peak demand of its customers. Consequently, it is essential that the effort involved in effectuating the Category A modifications calls for no more than one unit being shut down at a time and that each unit be shut down for no more than the minimal period necessary to effectuate those modifications.

FPL's lessons learned implementation program has been and will continue to proceed on a top-priority, maximum-effort basis. The program has been both expeditious and technically sound, and will be successful in completing the vast majority of the Category A items prior to January 1, 1980, and almost all items by the contemplated January 31, 1980 date. However, certain items cannot reasonably be completed and specific extensions of time are, therefore, required as follows:

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Turkey Point Unit 3 will be shut down for its annual refueling outage on January 1, 1980. Based on the projected material delivery dates, the Category A lesson's learned items can be completed prior to startup which is scheduled for February 1, 1980.

Every effort is being made on Turkey Point Unit 4 to complete as much of the Category A lesson's learned items as possible, in conjunction with work on Unit 3. Based on projected material delivery dates already completed, and FPL's current estimates and plans for the remaining work, the Category A lesson's learned items will be completed by February 15, 1980.

St. Lucie Unit 1 is currently scheduled to begin its annual refueling outage on March 15, 1980. Based on the projected material delivery dates, all Category A items, except for item 2.1.7.a (automatic initiation of auxiliary feedwater), and item 2.1.3.a (remote valve position indication), will be completed by February 15, 1980. It is our understanding that the Commission wishes item 2.1.7.a to be deferred to a later date. A shutdown to complete installation of the remote valve position indicator will take from 7 to 10 days. If the unit were shutdown for this sole purpose, FPL would be required to burn from 210,000 to 300,000 barrels of imported oil at a cost to our customers of \$3.5 to \$5 million. However, St. Lucie Unit 1 is now scheduled to begin refueling on March 15. If that date were also fixed as the date to begin the remote valve position indicator modifications, it would be unnecessary to use that additional amount of imported oil.

Since the accident at Three Mile Island, Florida Power & Light Company has taken steps to ensure that our control room operators have the ability to detect an open pressurizer relief valve from the plant's control room using existing diverse instrumentation. This has included a review of existing installed instrumentation and operator training. The short delay of the installation of additional instrumentation to detect an open pressurizer relief valve will not substantially affect our ability to detect an open relief valve. The required installation of remote valve position indication is in addition to other existing instrumentation available to detect an open pressurizer relief valve and clearly does not warrant the additional cost and consumption of imported oil required during a special shutdown.

It can be seen from the foregoing that the January 31, 1980 date cannot be met without multiple unit outages which would unacceptably jeopardize FPL's ability to meet its customers' requirements. Sequenced outages are essential and require extension for Turkey Point Unit 4 and St. Lucie Unit 1 to at least February 15. It can also be seen, however, that a significant amount of unnecessary oil imports and dollar exports can be avoided in this critical time for our nation by simply extending the time to complete one item on St. Lucie Unit 1 an additional 30 days to March 15.

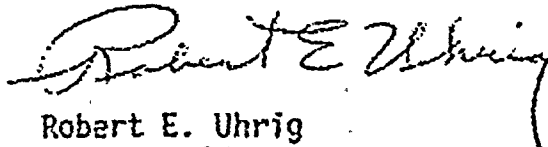
We submit that the requested schedule would accommodate the special problems



Page Three -- December 21, 1979

which are recognized to exist in Florida, and minimize otherwise serious impacts on the economy and FPL's customers without significantly jeopardizing safety.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert E. Uhrig".

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/ah



# REGULATORY DOCKET FILE COPY

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON D.C. 20555

September 24, 1980

Docket No. 50-250  
50-251

SEE ATTACHED LIST

DISTRIBUTION  
Docket File 50-250  
50-251

Subject: FLORIDA POWER AND LIGHT CO.  
Turkey Point Plant Units 3 and 4

ORB1 Reading  
CSParrish  
MGrotenhuis

The following documents concerning our review of the subject facility  
are transmitted for your information:

- ☐ Notice of Receipt of Application.
- ☐ Draft/Final Environmental Statement, dated \_\_\_\_\_.
- ☐ Safety Evaluation, or Supplement No. \_\_\_\_\_, dated \_\_\_\_\_.
- ☐ Notice of Hearing on Application for Construction Permit.
- ☐ Notice of Consideration of Issuance of Facility Operating License.
- ☐ Application and Safety Analysis Report, Vol. \_\_\_\_\_.
- ☐ Amendment No. \_\_\_\_\_ to Application/SAR, dated \_\_\_\_\_.
- ☐ Construction Permit No. CPPR- \_\_\_\_\_, dated \_\_\_\_\_.
- ☐ Facility Operating License No. DPR- \_\_\_\_\_, NPF- \_\_\_\_\_, dated \_\_\_\_\_.
- ☐ Amendment No. \_\_\_\_\_ to CPPR- \_\_\_\_\_ or DRR- \_\_\_\_\_, dated \_\_\_\_\_.
- ☒ Other: Monthly operating reports for September 1979.
- ☒ (8005200392).

Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

cc:

*St 1*

OFFICE	DL:ORB1				
SURNAME	CSParrish;cf				
DATE	9/ /80				

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cc: Chief  
Division of Ecological Services  
Bureau of Sport Fisheries & Wildlife  
U. S. Department of the Interior  
Washington, D. C. 20240

Director  
National Oceanographic Data Center  
Environmental Data Service  
National Oceanic & Atmospheric Administration  
U. S. Department of Commerce  
Washington, D. C. 20235

Dr. James T. Tanner  
National Bureau of Standards  
Reactor Building 235  
Washington, D. C. 20234

Director  
Technical Assessment Division  
Office of Radiation Programs (AW-459)  
U. S. Environmental Protection Agency  
Crystal Mall #2  
Arlington, Virginia 20460

U. S. Environmental Protection Agency  
Region IV Office  
ATTN: EIS COORDINATOR  
345 Courtland Street, N.E.  
Atlanta, Georgia 30308