

March 11, 1980
L-80-80

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut
Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Unit 4
Docket No. 50-251
Steam Generator Inspection

On May 18, 1979 (L-79-122), Florida Power & Light Company submitted the results of the most recent steam generator inspection and preventive tube plugging program for Turkey Point Unit 4. The report provided justification for in excess of ten equivalent months of operation prior to performing the next steam generator inspection. The NRC has approved nine equivalent months of operation prior to the next inspection. This letter requests one additional month of operation for a total of ten equivalent months.

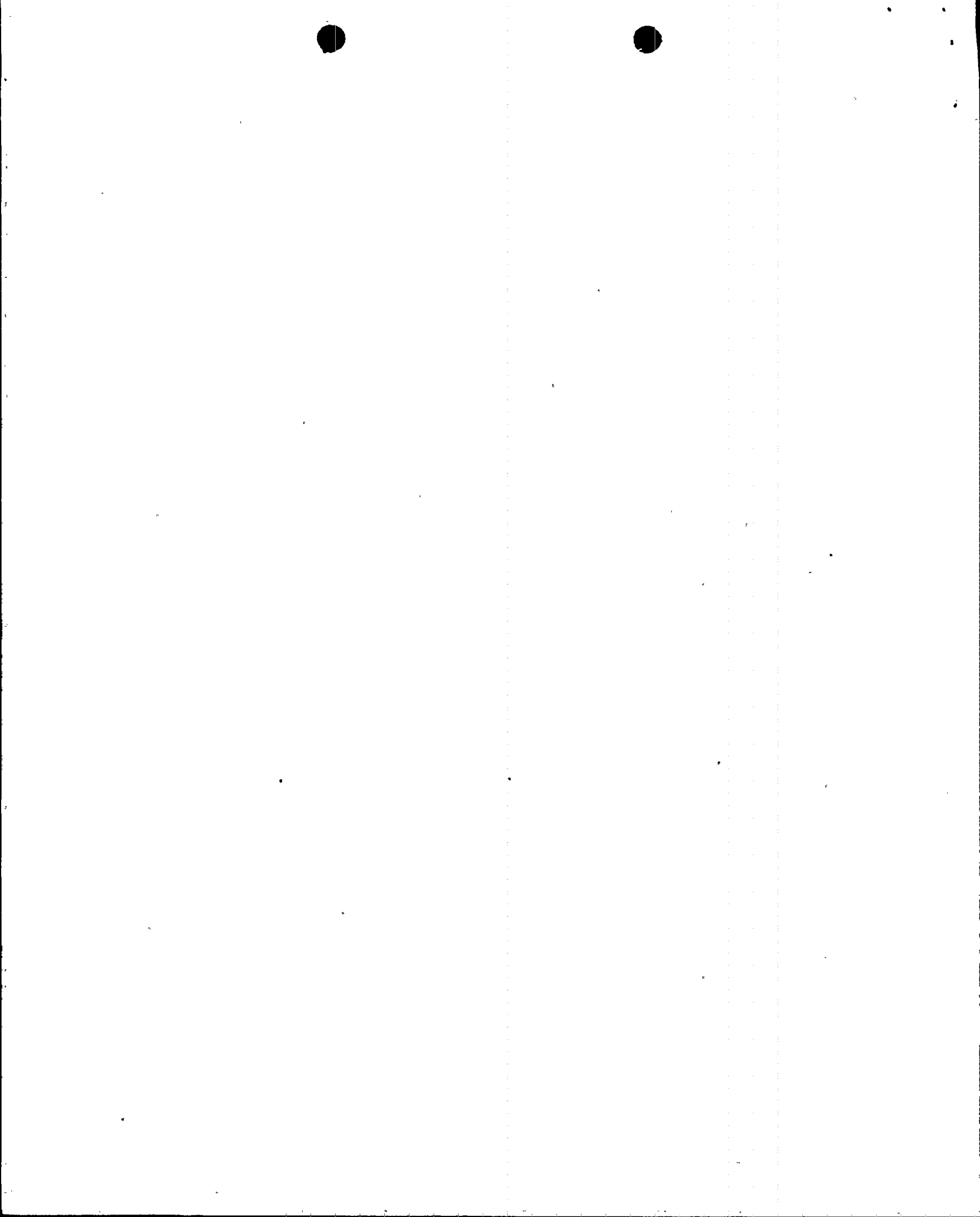
Florida Power & Light Company letters of January 23, 1980 (L-80-32), February 1, 1980 (L-80-40) and February 14, 1980 (L-80-53) provided information in support of our request to operate Turkey Point Unit 4 for a total of ten equivalent months. In addition, a meeting was held with members of your staff on March 4, 1980 to discuss this request for one additional month beyond the currently authorized nine months. The information presented at the meeting is attached to this letter.

In summary, continued safe operation of Unit 4 for one additional month is technically justified in consideration of:

- . The steam generators were inspected and tubes plugged during the last inspection for ten equivalent months of operation.
- . The conservative methodology of the six month preventive plugging program has been applied to the tube plugging performed for the current ten month interval.
- . For added conservatism, additional plugging criteria were applied to the plugging program for ten months.

Approved
3/3
w/check
\$4,000.00

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Office of Nuclear Reactor Regulation
Page Two

- There have been no steam generator tube leaks during the currently authorized nine month operation interval. Furthermore, there have been no tube leaks at Unit 4 in over two years. The last leak occurred on February 15, 1978.

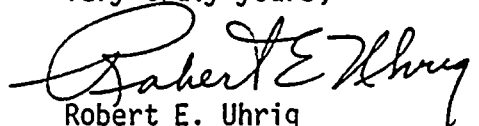
The recent leak free operating experience, the conservatism applied in selecting tubes which were plugged for the current operating interval, and analyses provided in the above referenced letters demonstrate that continued operation of Unit 4 for one additional month will not endanger the health and safety of the public.

During the next steam generator inspection outage, which is currently scheduled to begin on March 24, 1980, we plan to inspect the Unit 4 low pressure turbine rotors. Based on the current delivery date for the Unit 4 rotors, a one month extension to April 24, 1980 would provide Florida Power & Light Company the opportunity to replace the low pressure turbine rotors during the steam generator inspection outage, in lieu of a rotor inspection now with possible replacement during the fall refueling.

Florida Power & Light Company concludes that Turkey Point Unit 4 can be safely operated for one additional equivalent full power month. The leak free operating experience during the past two years and particularly since the last steam generator inspection demonstrates the conservatism in the preventive plugging program and justifies continued operation. As discussed with your staff, Florida Power & Light Company plans to reinspect the Unit 4 steam generators during the next refueling outage which is scheduled for fall 1980.

We have determined that this is a Class III request in accordance with 10 CFR 170. Accordingly, a check for \$4,000 is enclosed.

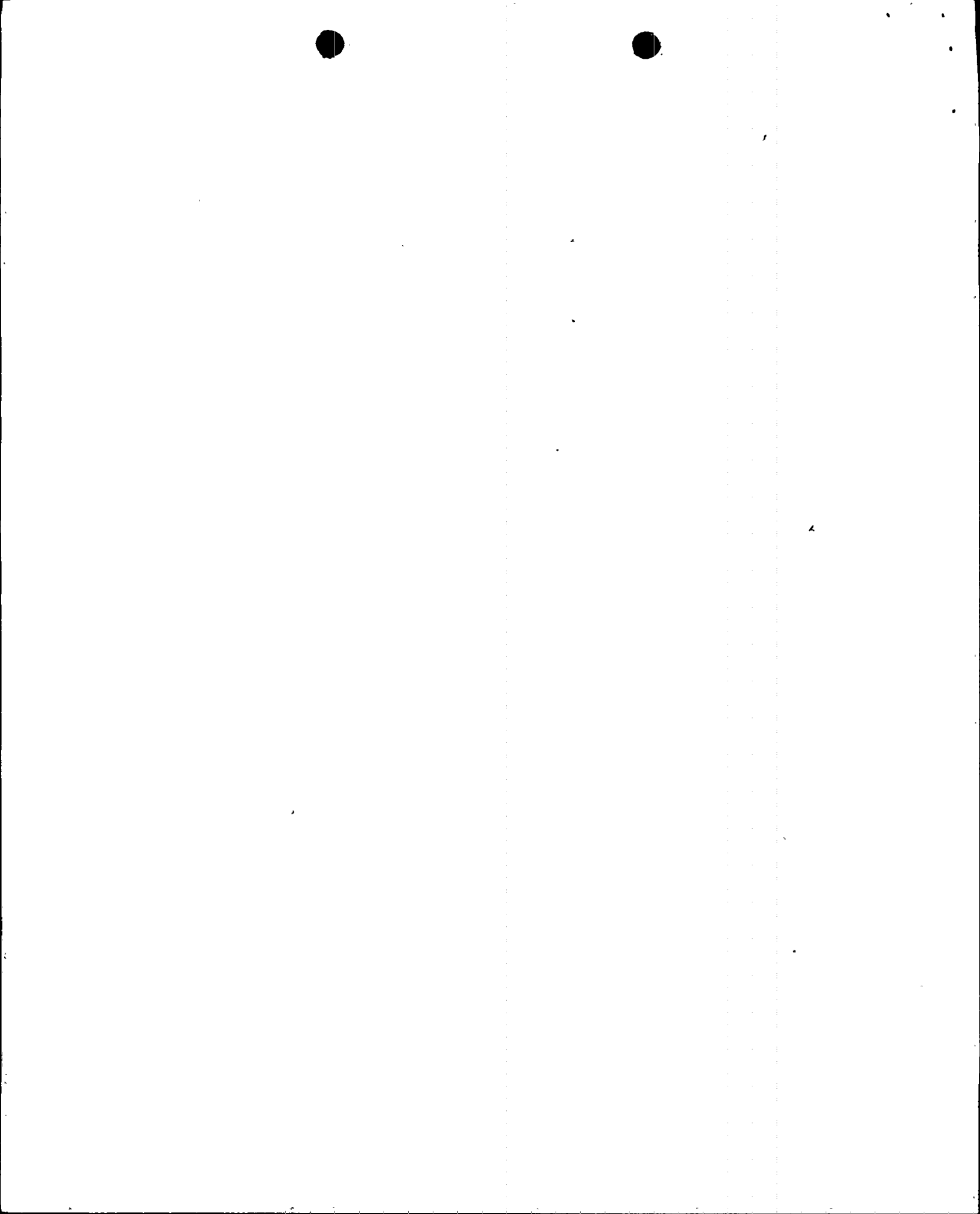
Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/RAK/ah

Attachments

cc: J. P. O'Reilly, Region II
Harold R. Reis, Esquire




STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

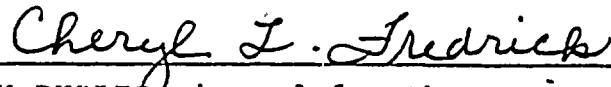
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said 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.

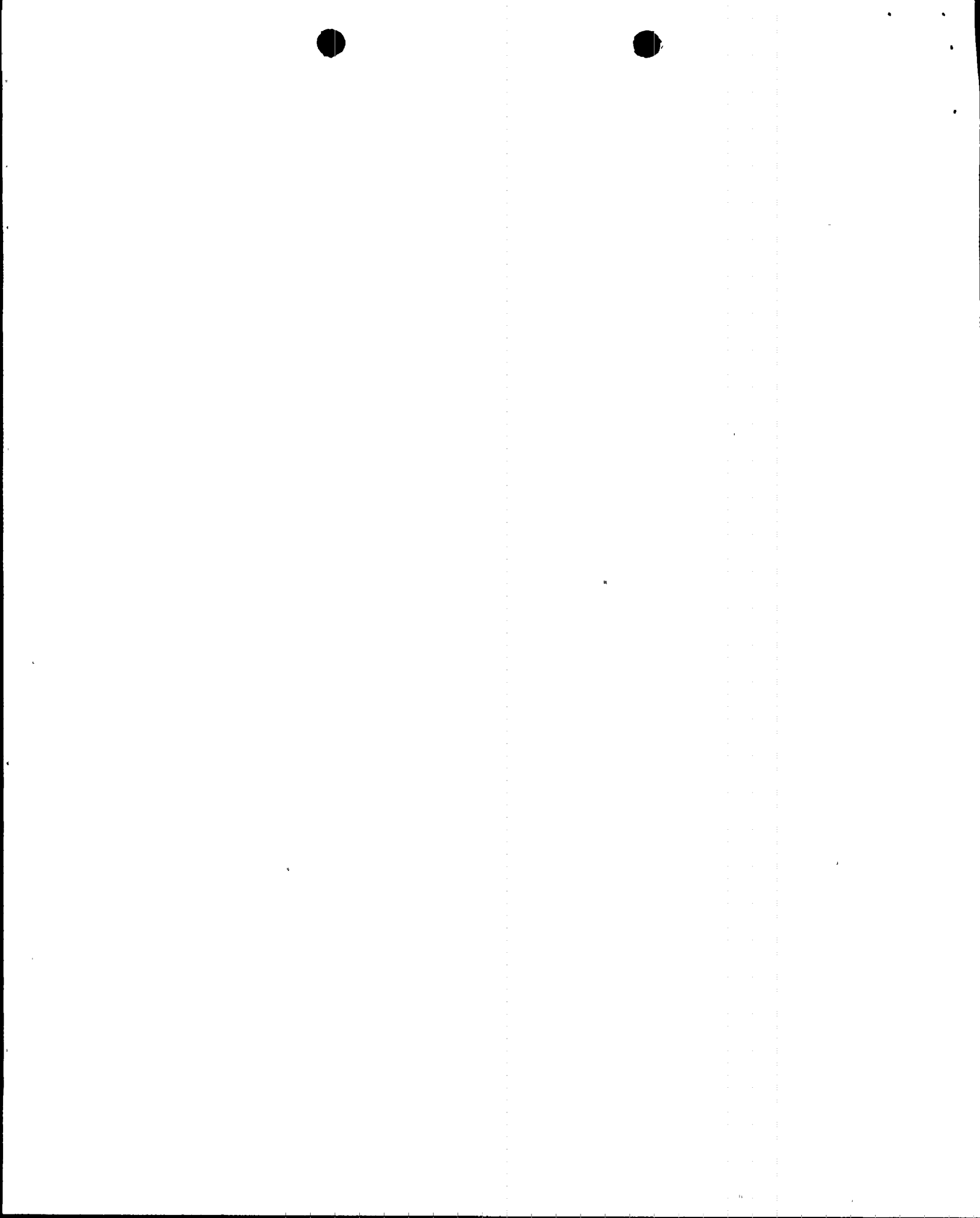

Robert E. Uhrig

Subscribed and sworn to before me this

13 day of March, 1980


NOTARY PUBLIC, in and for the county of Dade,
State of Florida

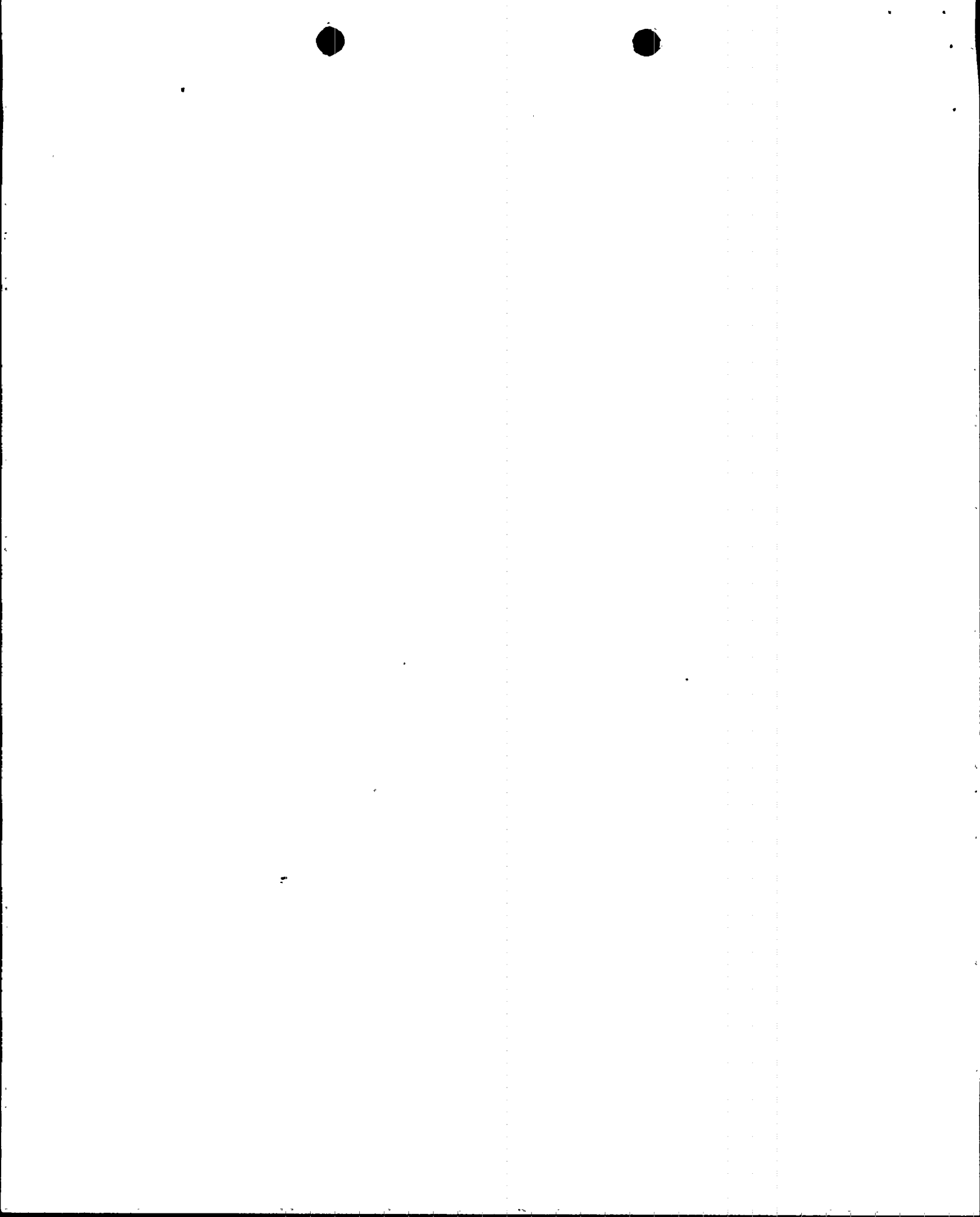
My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency



TURKEY POINT #4

PRESENT STATUS

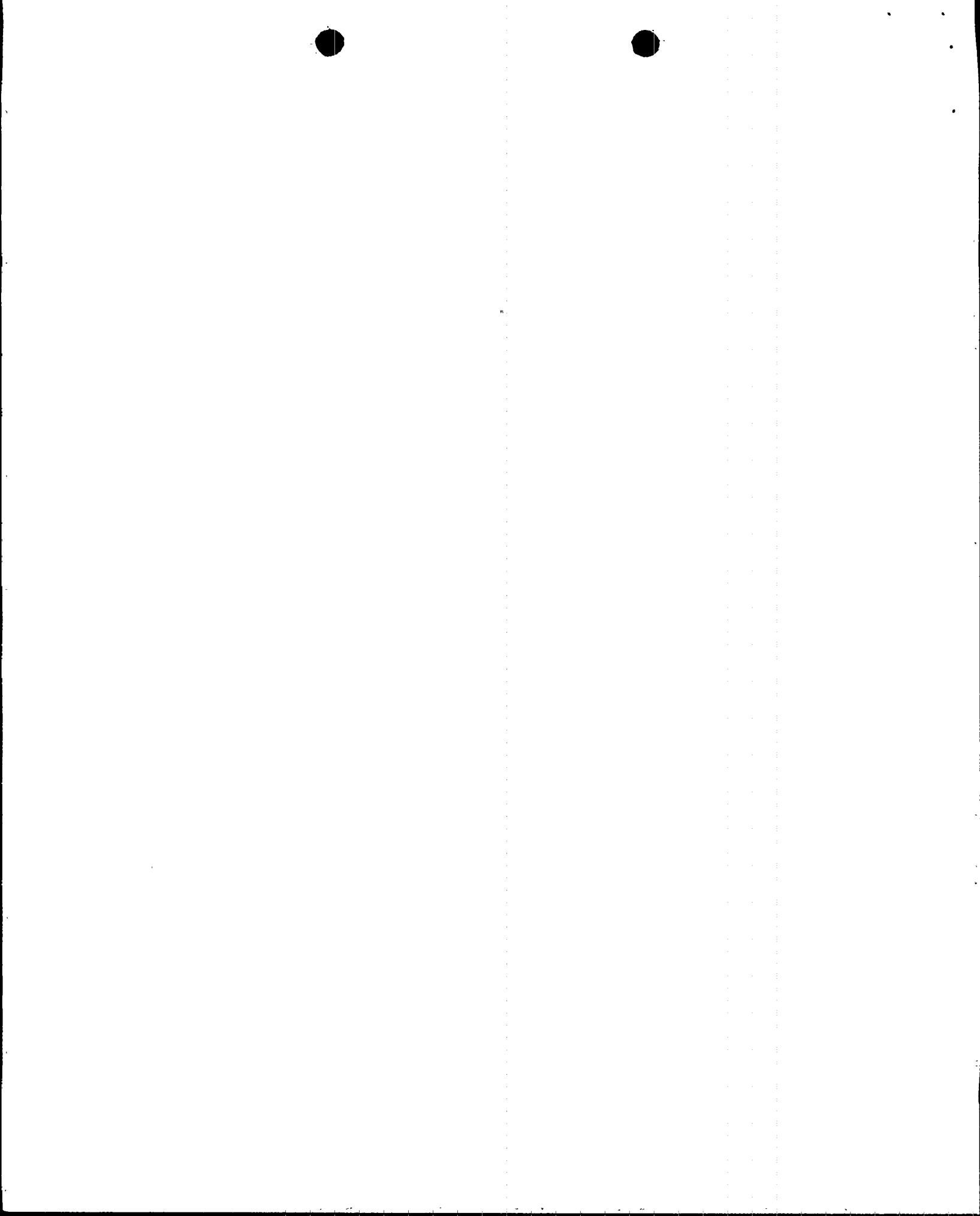
Plant operating without steam generator tube leakage
eight (8) months since the last gauging inspection;
the unit has 20.6% of its tubes plugged ~ 23 months
beyond closure of the support plate flow slots.



TURKEY POINT #4

Results of April, 1979 Inspection

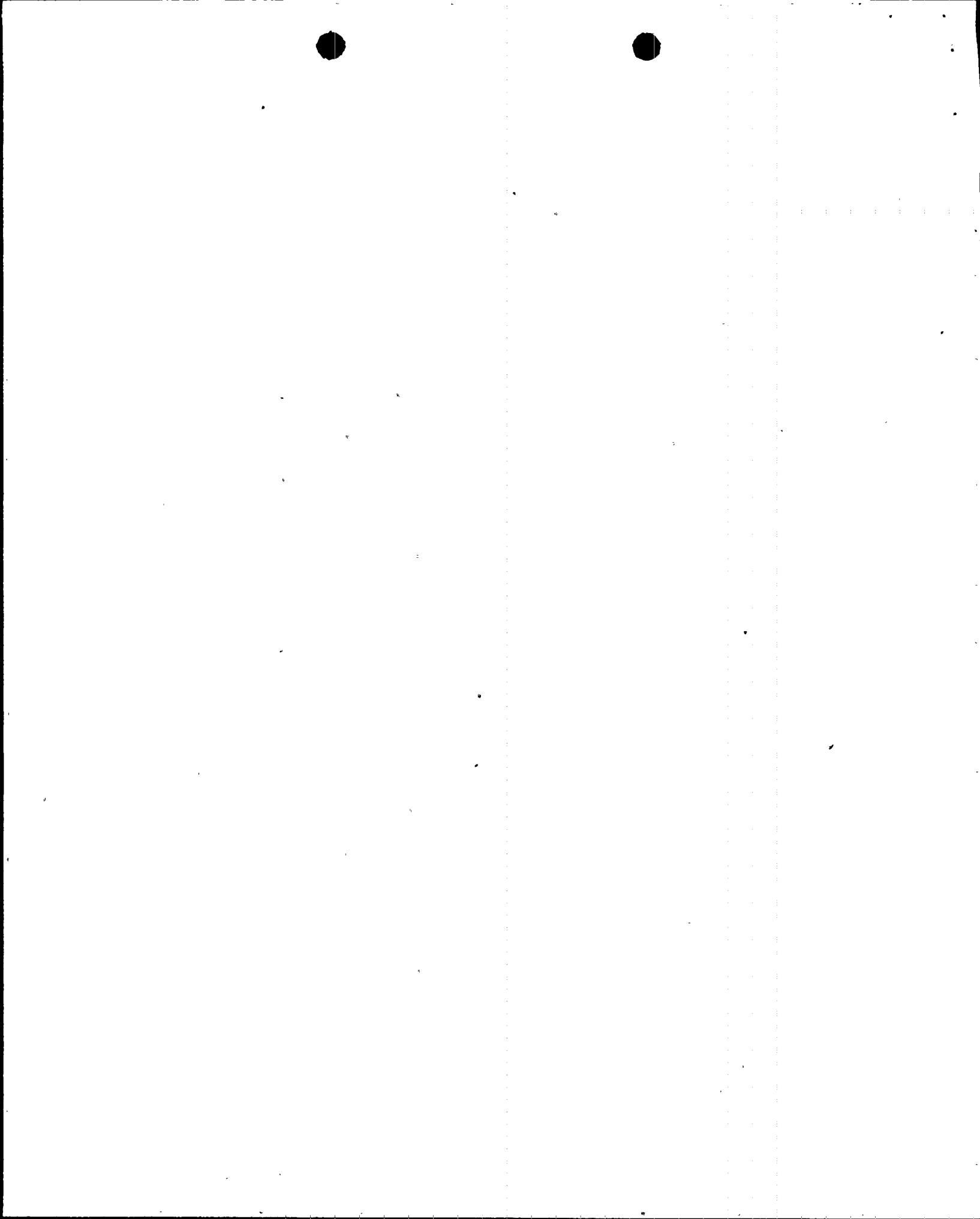
- No tube leaks
- Tubelane area tube ID restrictions (< 650 mil) fall within 15% strain contour (and 17.5%)
 - 540 mil restrictions, 2 inlet, 1 outlet adjacent to hardspots in or below Row 4
 - Restrictions adjacent to previous activity
- Wedge area activity consistent with prior experience
- Outlet restrictions (< 610 mils) - 9 total, consistent with earlier Turkey Point behavior
- No U-bend indications in Rows 2-5 @100kHz
- No large deviations in annulus measurements
- Flow slots on #1 TSP's exhibit continuing plate expansion ($\sim 0.05''/\text{mo}$)
- Reg. Guide 1.83 inspections resulted in plugging six (6) tubes



TURKEY POINT #4

10 Month Plugging Basis

- All 540 mil restrictions
- Tubes 3 rows beyond observed 540 mil restrictions in tubelane area (instead of 2 rows) in addition to tubes between tubelane and observed 540
- Tubes up to 6 rows beyond observed 540's in Columns 1-13 and 80-92; no less than 3 rows beyond at flow slot edges
- All 610 mil restrictions plus tubes in tubelane region in columns below observed 610's
- All tubes adjacent to observed leaking tubes or 540 mil restriction in wedge regions
- "Valley plugging", islands within active areas on the basis of engineering judgment
- All 650 mil restrictions on periphery or patchplate boundaries.



TURKEY POINT UNITS 3 & 4
LEAK AREAS
HISTORICAL SUMMARY

- Last forced outages to repair tube leaks:

T.PT.3	7/78	1 tube
T.PT.4	2/15/78	2 tubes

- Last tube leak occurrences in tubelane area:

T.PT.3	7/78	1 tube
T.PT.4	2/15/78	1 tube

- Last tube leak occurrences in periphery:

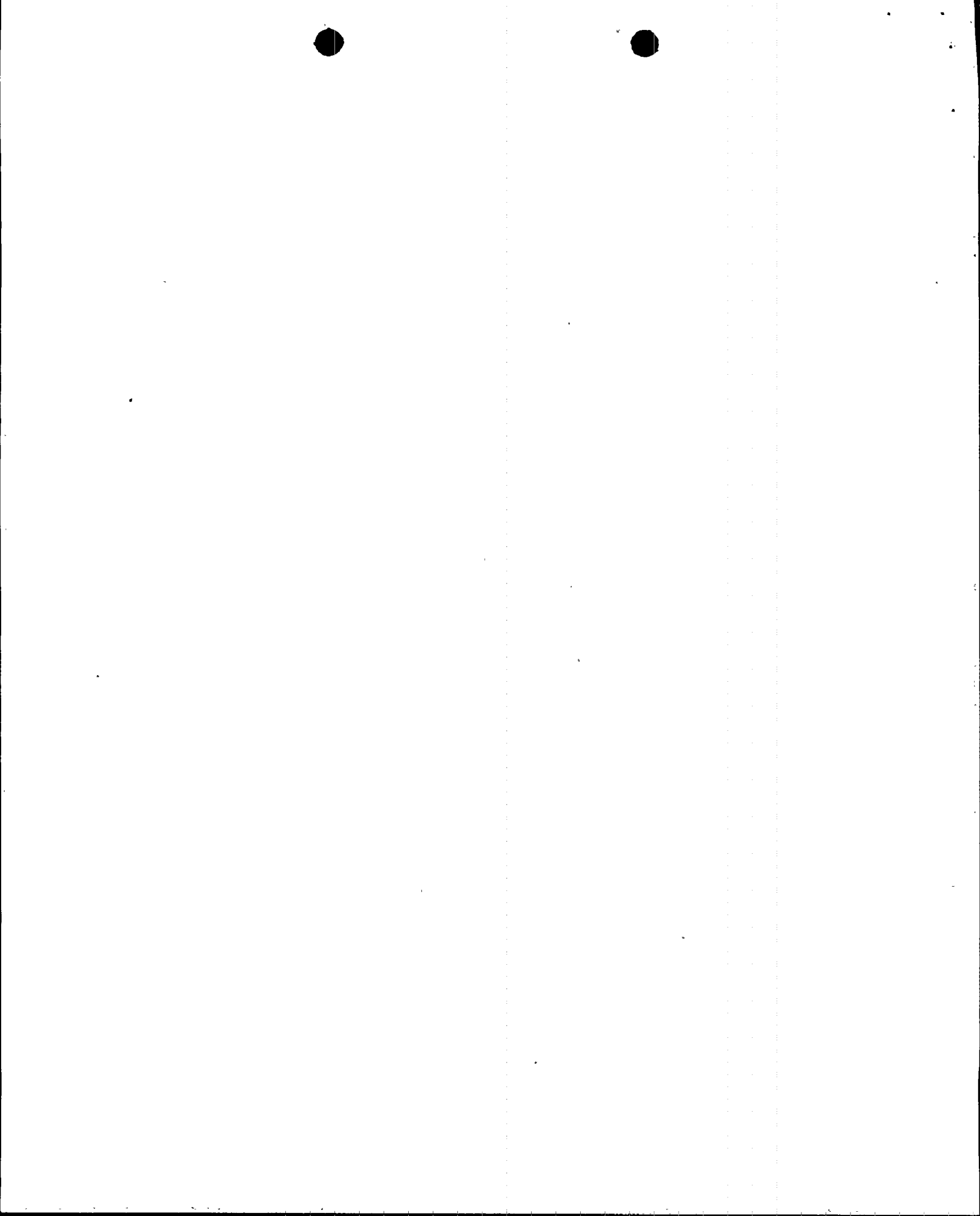
T.PT.3	2/79	1 tube
T.PT.4	9/9/76	1 tube

- Last tube leak occurrences in patchplate:

T.PT.3	3/7/76	2 tubes
T.PT.4	3/21/77	1 tube

- Last tube leak occurrences in unit:

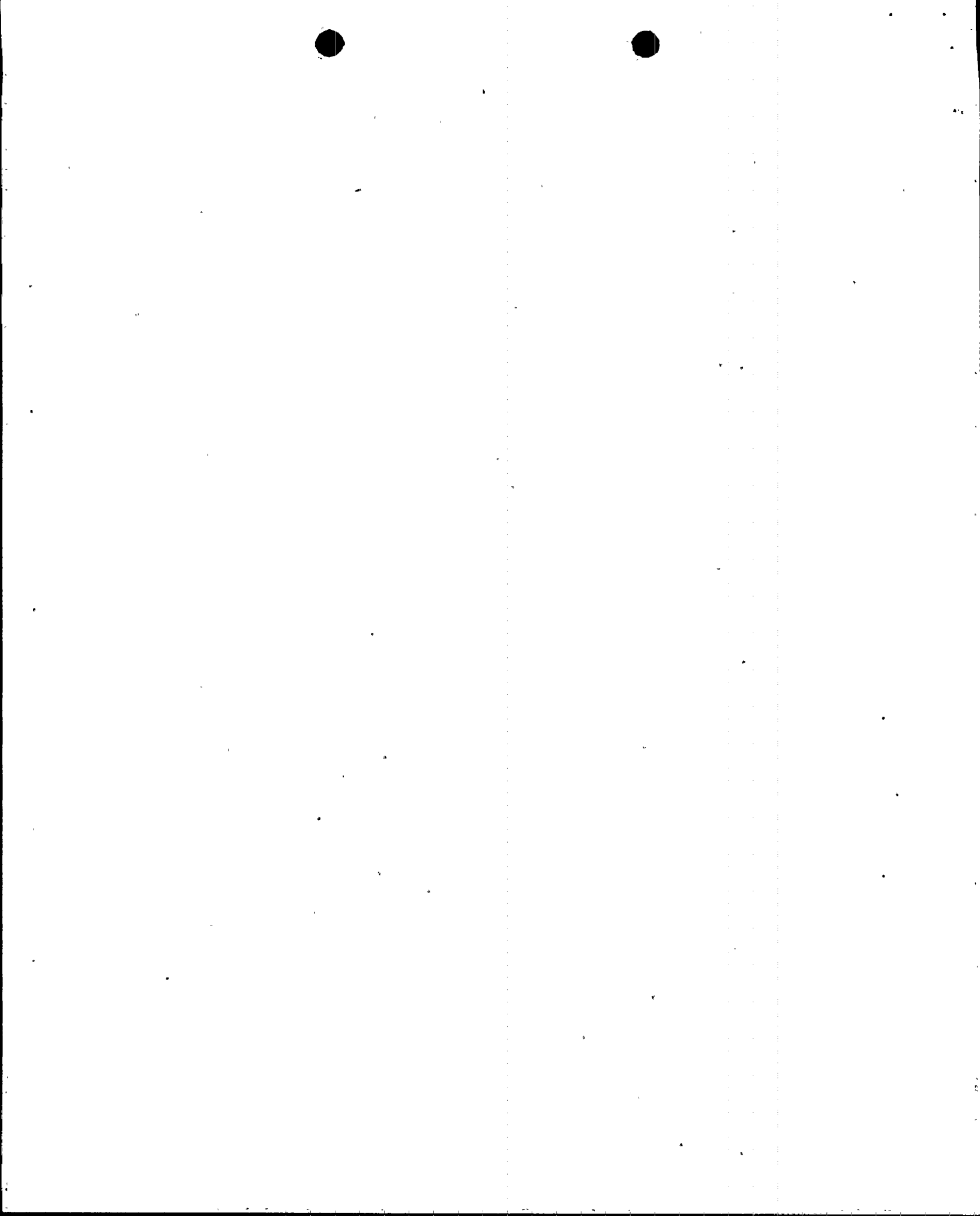
T.PT.3	2/79	3 tubes (Found by Hydro)
T.PT.4	2/15/78	2 tubes



TURKEY POINT UNIT 4

Number of Tubes Plugged in Each Year of Operation

<u>Year of Plugging.</u>	<u>Tubes Plugged</u>			<u>Total Tubes Plugged</u>
	<u>SGA</u>	<u>SGB</u>	<u>SGC</u>	
Shop	3	1	0	4
1973	0	0	0	0
1974	33	42	8	83
1975	64	80	96	240
1976	94	151	103	348
1977	133	313	175	621
1978	255	107	172	534
1979	79	52	54	185
1980 (to 3/1)	0	0	0	
	—	—	—	—
TOTALS	661	746	608	2015
Percentage of tubes plugged:	20.3	22.9	18.9	20.6



TURKEY POINT UNIT 4

Number of Leaking Tubes Per S/G in
Each Year of Operation

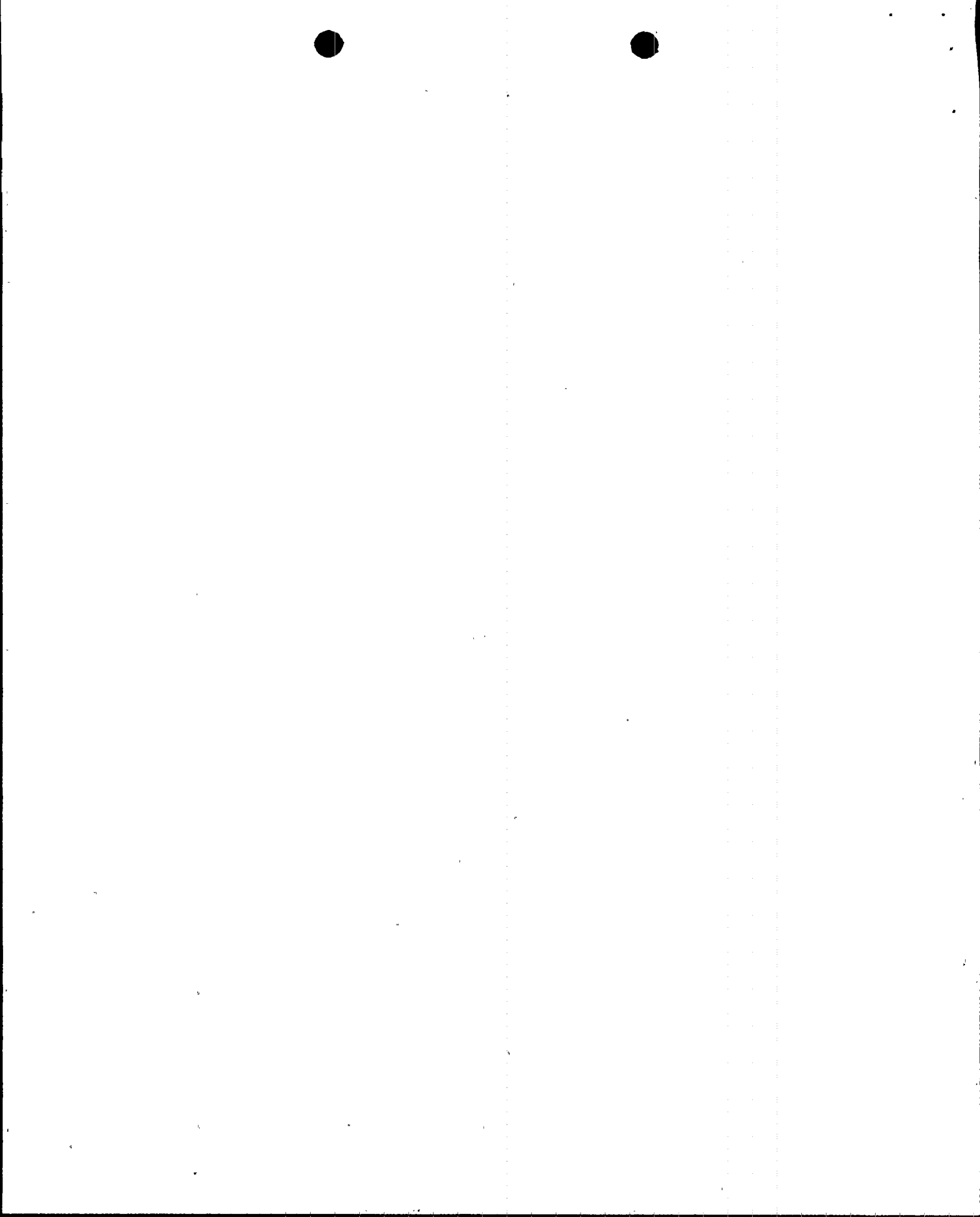
Year of <u>Plugging</u>	No. of Leaking Tubes		
	<u>SGA</u>	<u>SGB</u>	<u>SGC</u>
1973	0	0	0
1974	1	0	0
1975	0	2	0
1976	0	12	3
1977	0	2	9
1978	1	0	1
1979	0	0	0
1980 (to 3/1)	0	0	0
	—	—	—
SG TOTALS	2	16	13
GRAND TOTAL	31 Tubes		

TURKEY POINT #4
STEAM GENERATOR GAUGING

<u>Inspection Date</u>	<u>Strain Contour</u>	<u>Plugging Basis</u>	<u>(Months Operation)</u>
2/78	12.5%	6	
8/78	15%	6	No Leaks
4/79	15%	10	No Leaks

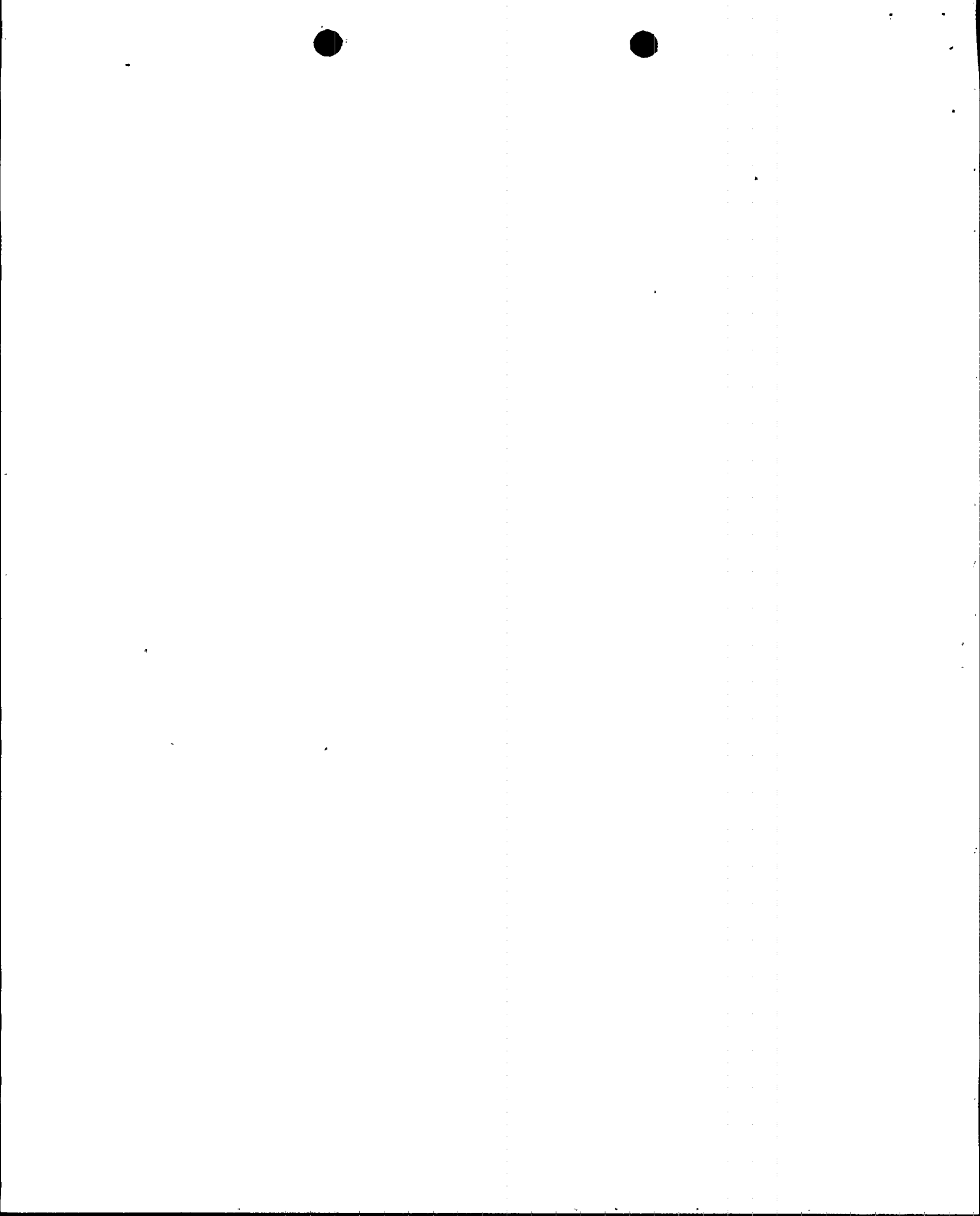
DENT RELATED
STEAM GENERATOR TUBE LEAKS
TURKEY POINT #3

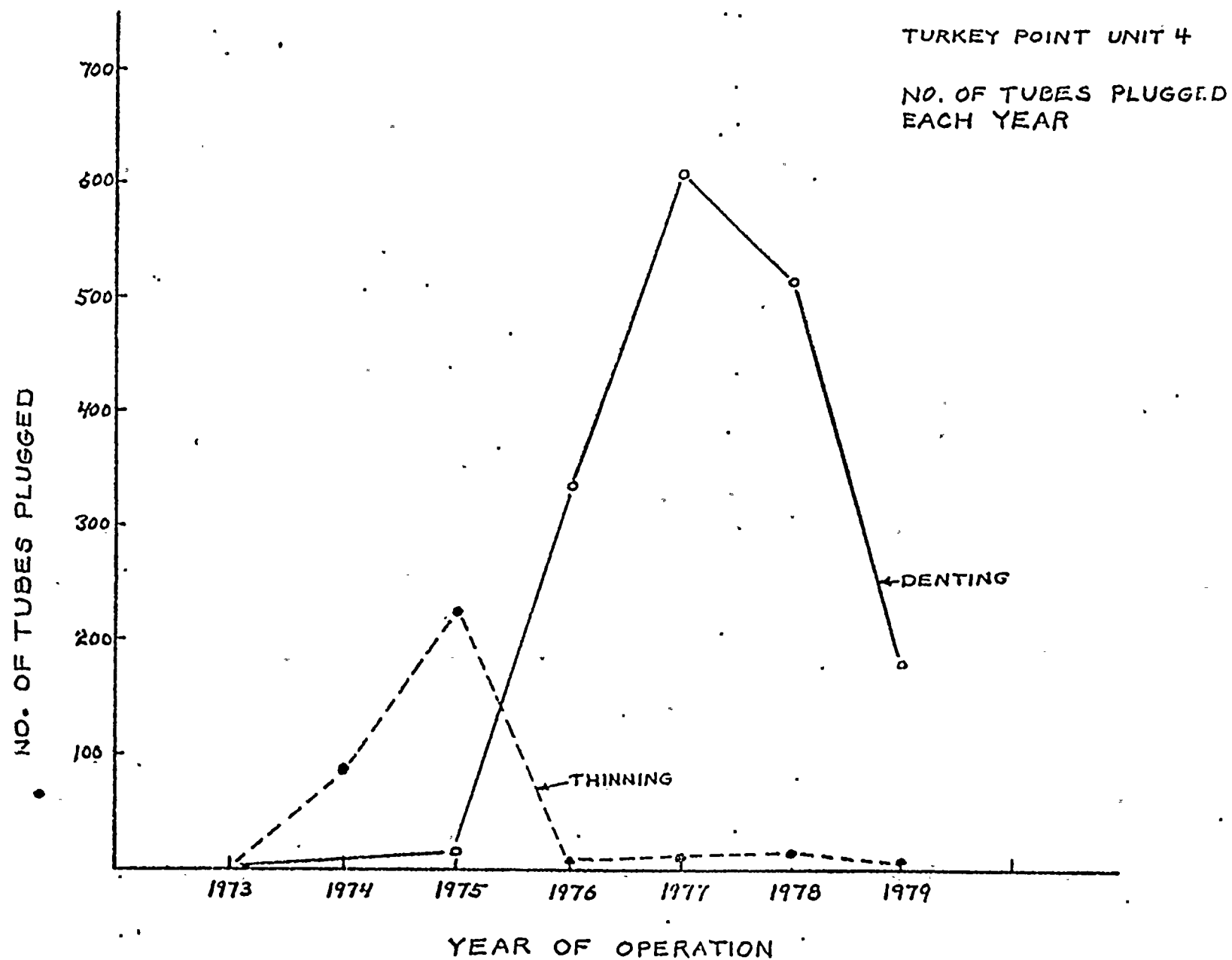
1976	7 leakers:	1 peripheral	2 patchplate	2 tubelane	2 wedge.
1977	1 leaker:			1 tubelane	
1978	1 leaker:			1 tubelane	
1979	<u>3 leakers:</u>	<u>1 peripheral</u>	<u> </u>	<u> </u>	<u>2 wedge</u>
TOTALS	12 leakers:	2 peripheral	2 patchplate	4 tubelane	4 wedge

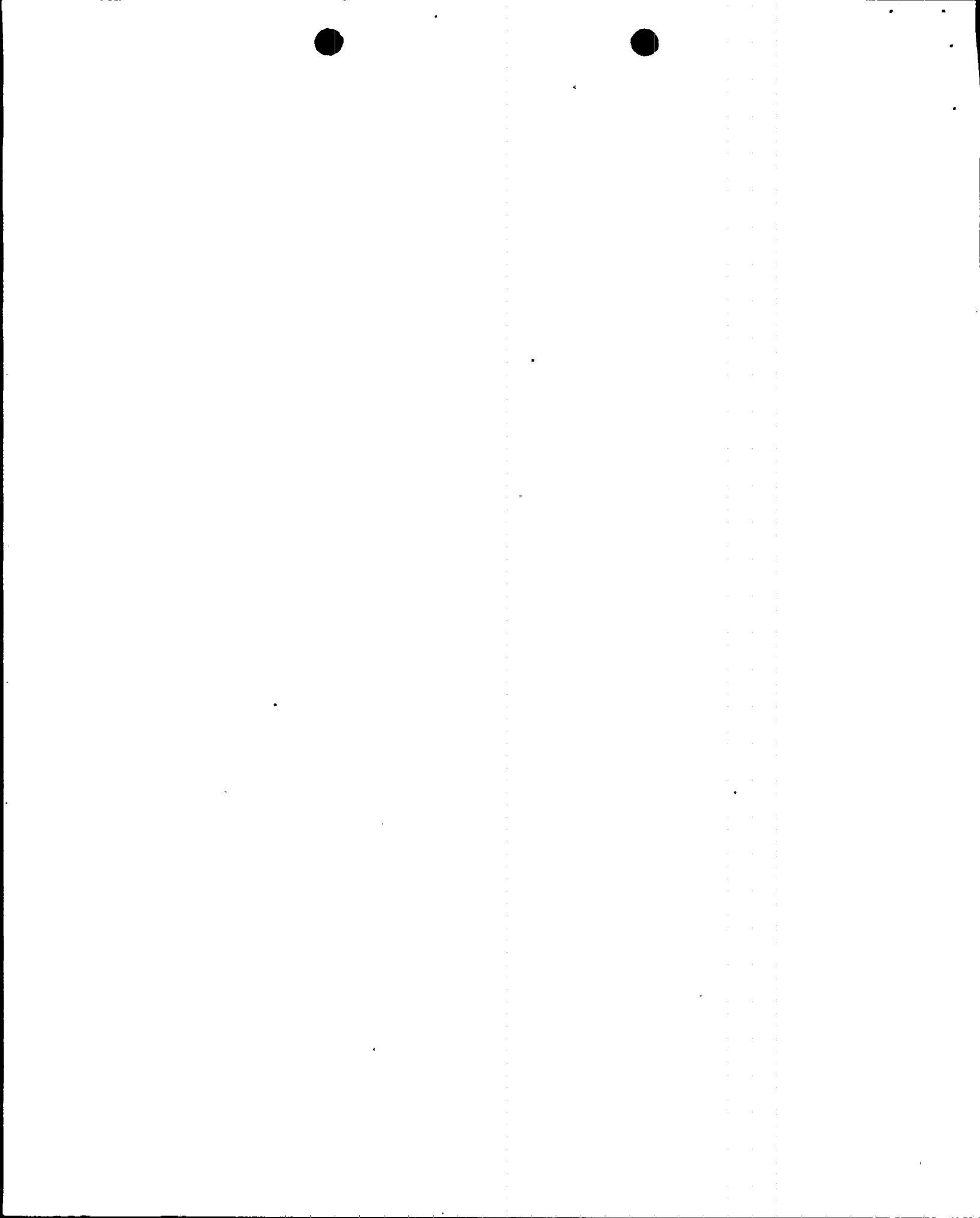


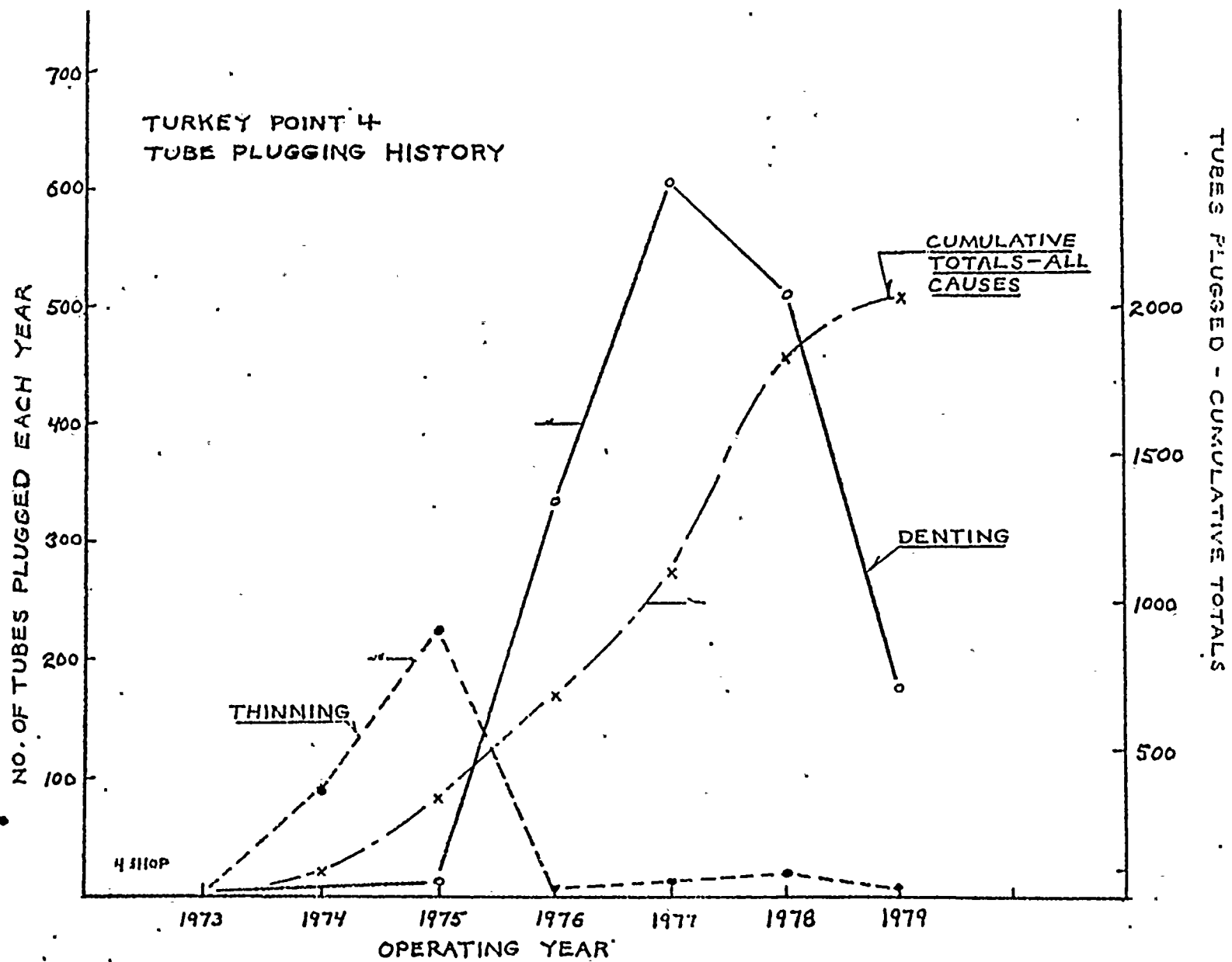
DENT RELATED
STEAM GENERATOR TUBE LEAKS
TURKEY POINT #4

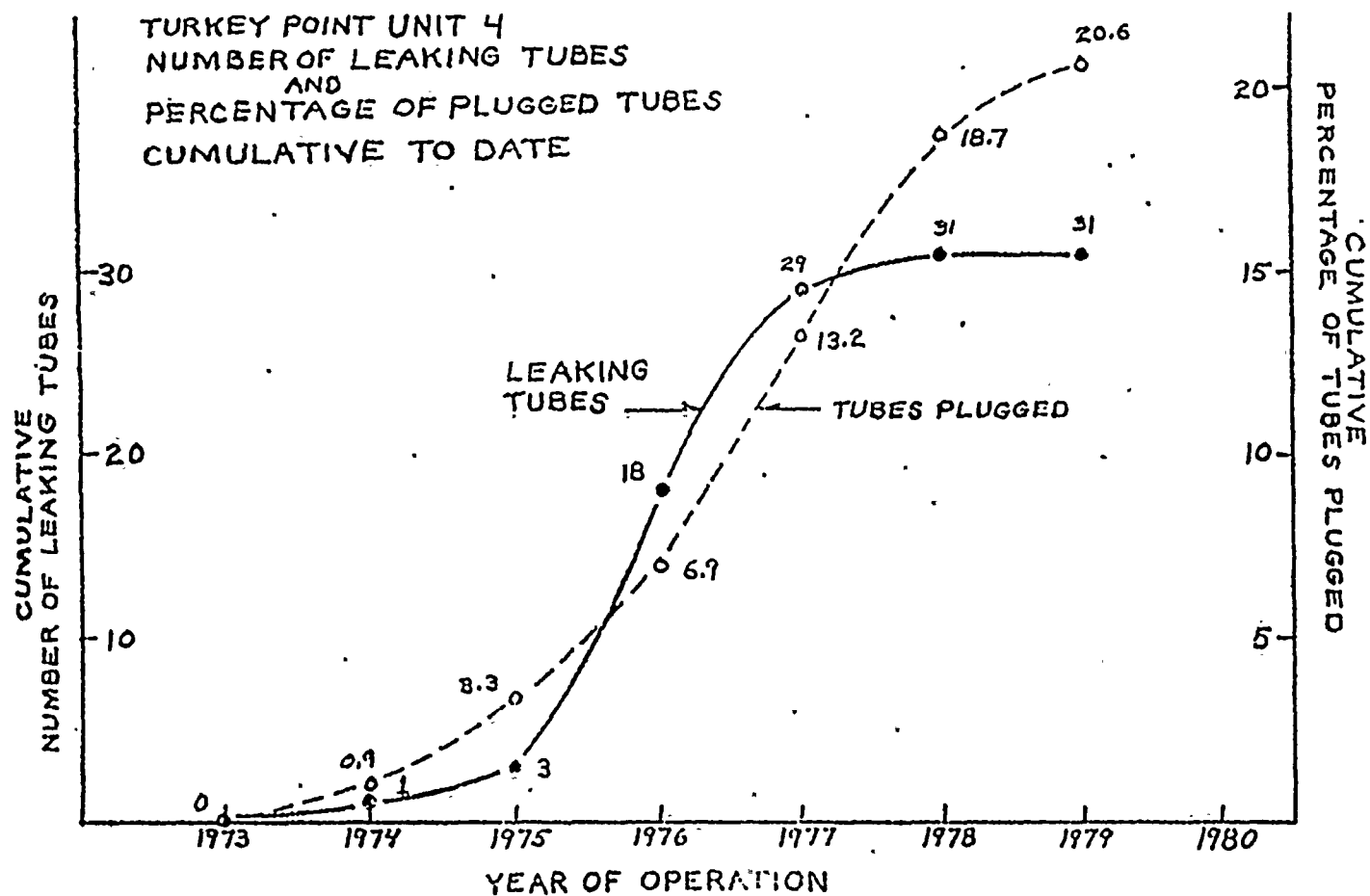
1975	2 leakers:				2 wedge
1976	15 leakers:	1 central TS		12 tubelane	2 wedge
1977	11 leakers:	1 central TS	3 patchplate	7 tubelane	
1978	2 leakers:	1 central TS		1 tubelane	
1979	<u>0 leakers</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
TOTALS	30 leakers:	3 central TS	3 patchplate	20 tubelane	4 wedge
		0 peripheral			

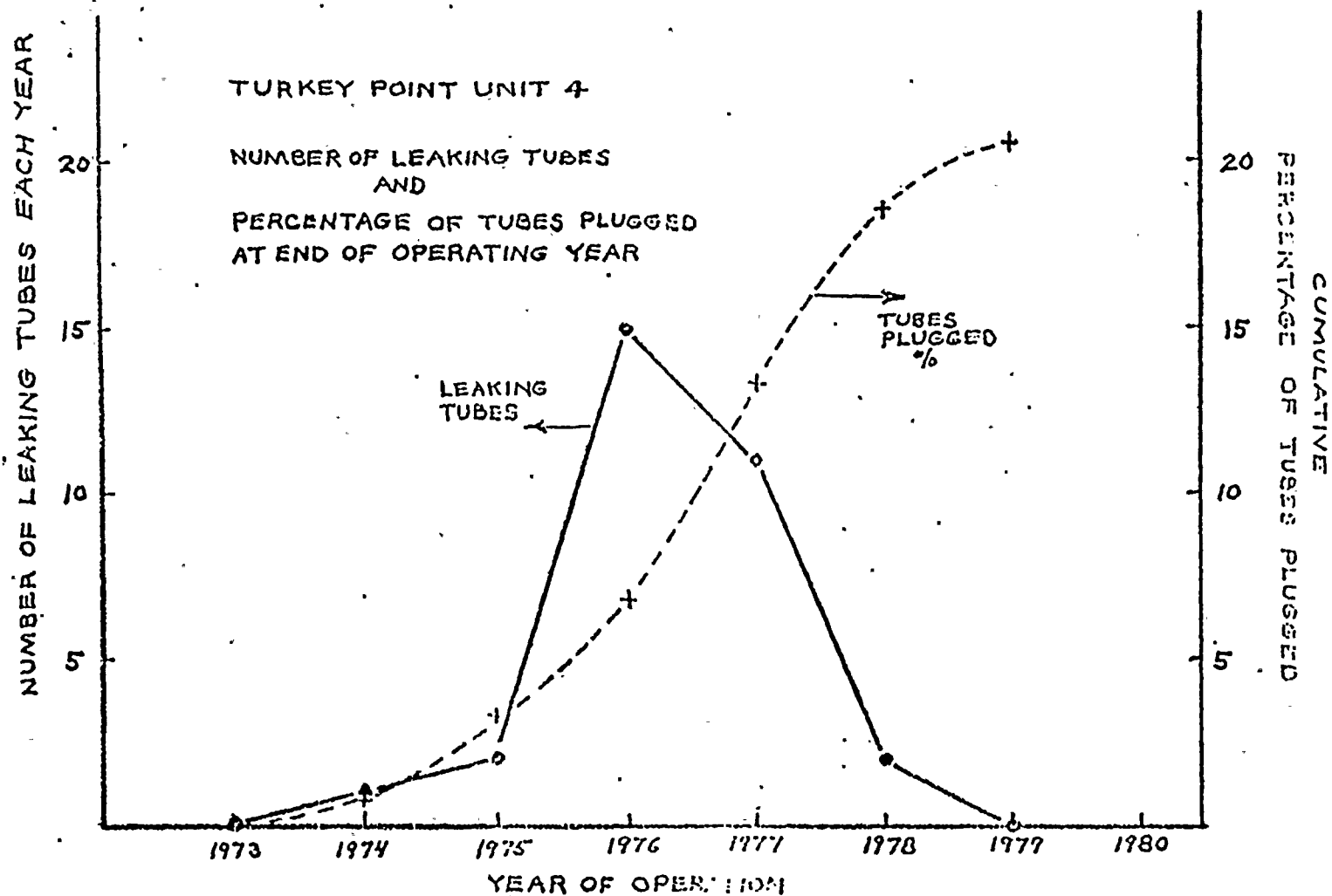


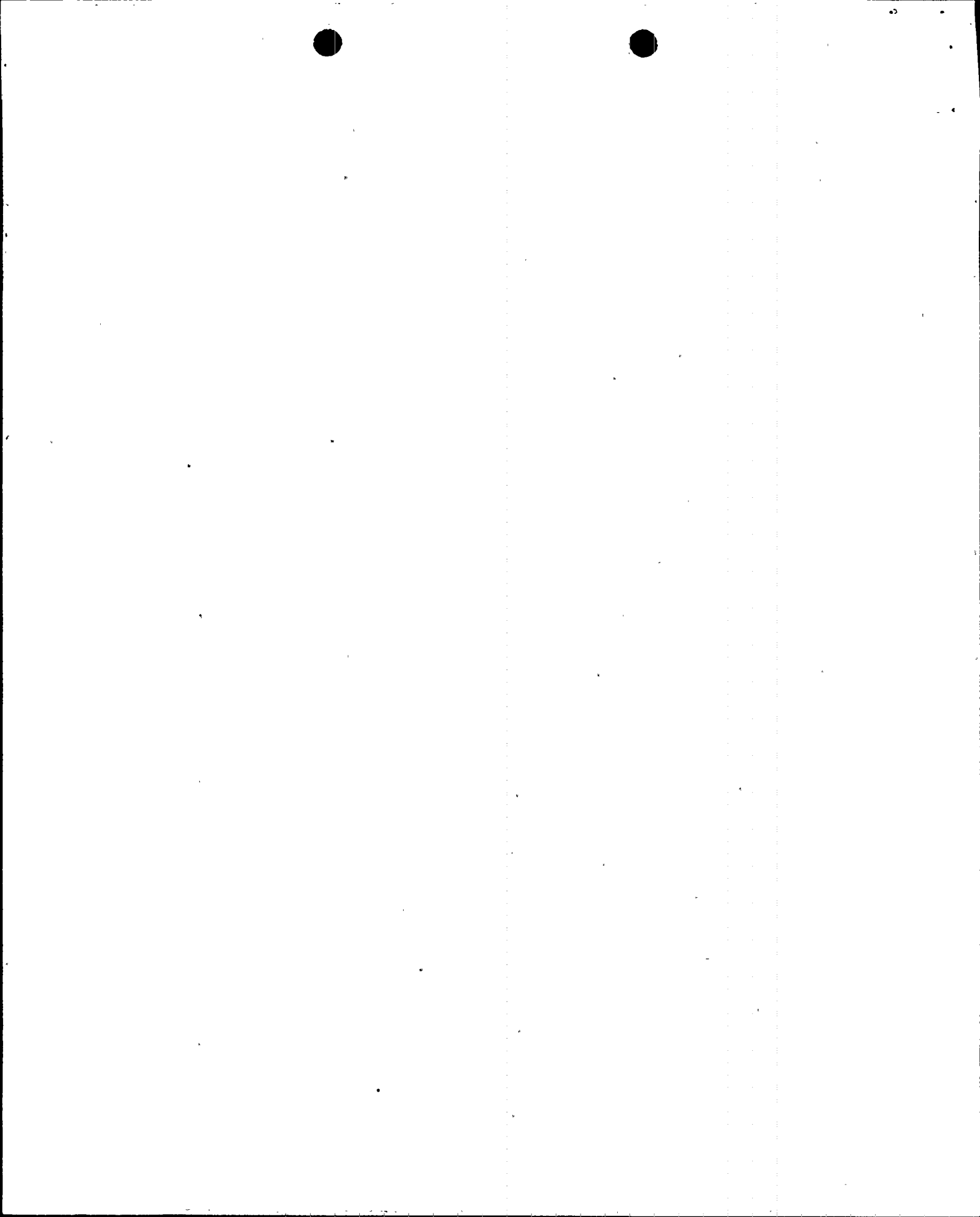








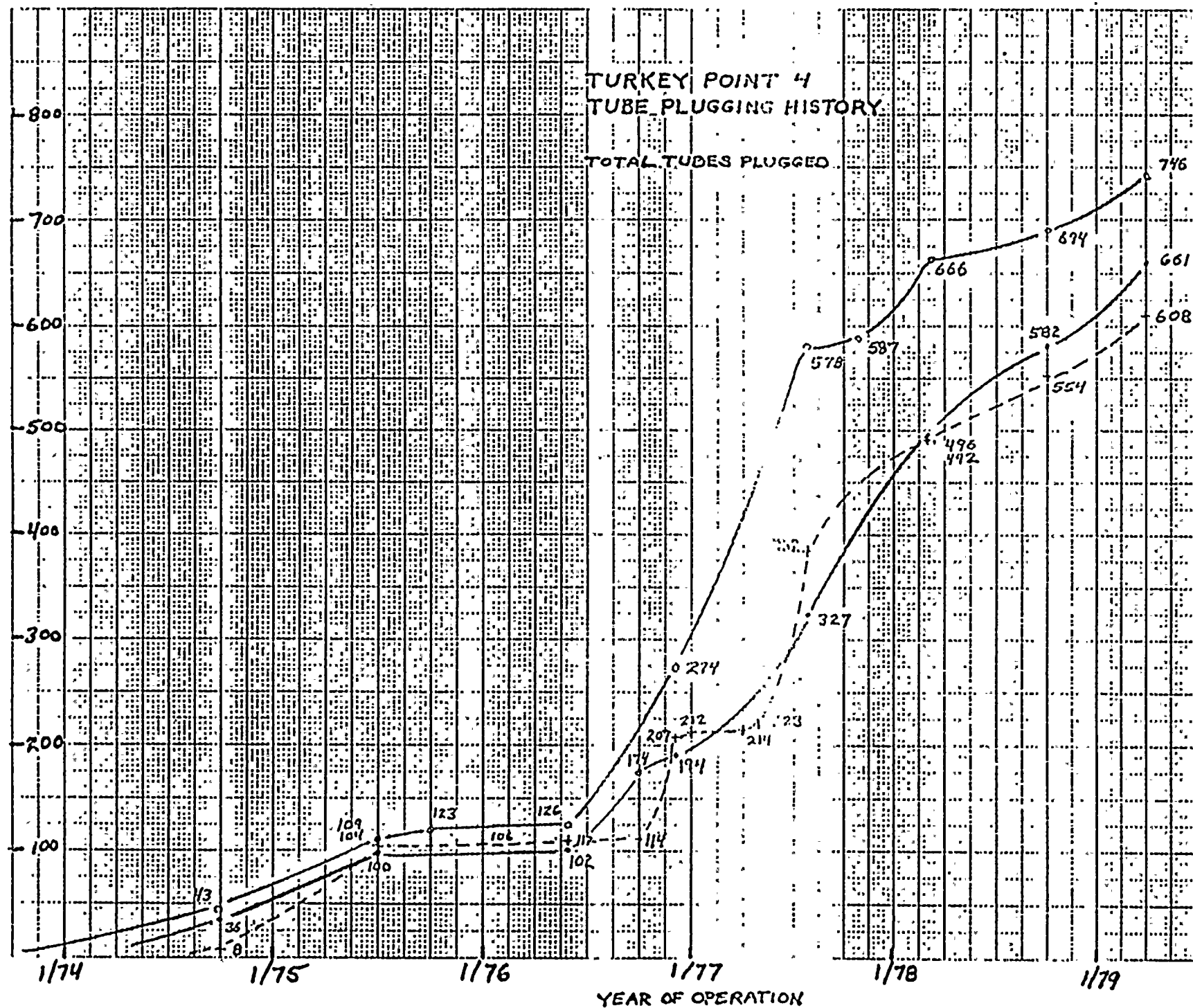




TUBES PLUGGED
CUMULATIVE TOTAL

TURKEY POINT 4 TUBE PLUGGING HISTORY

TOTAL TUBES PLUGGED

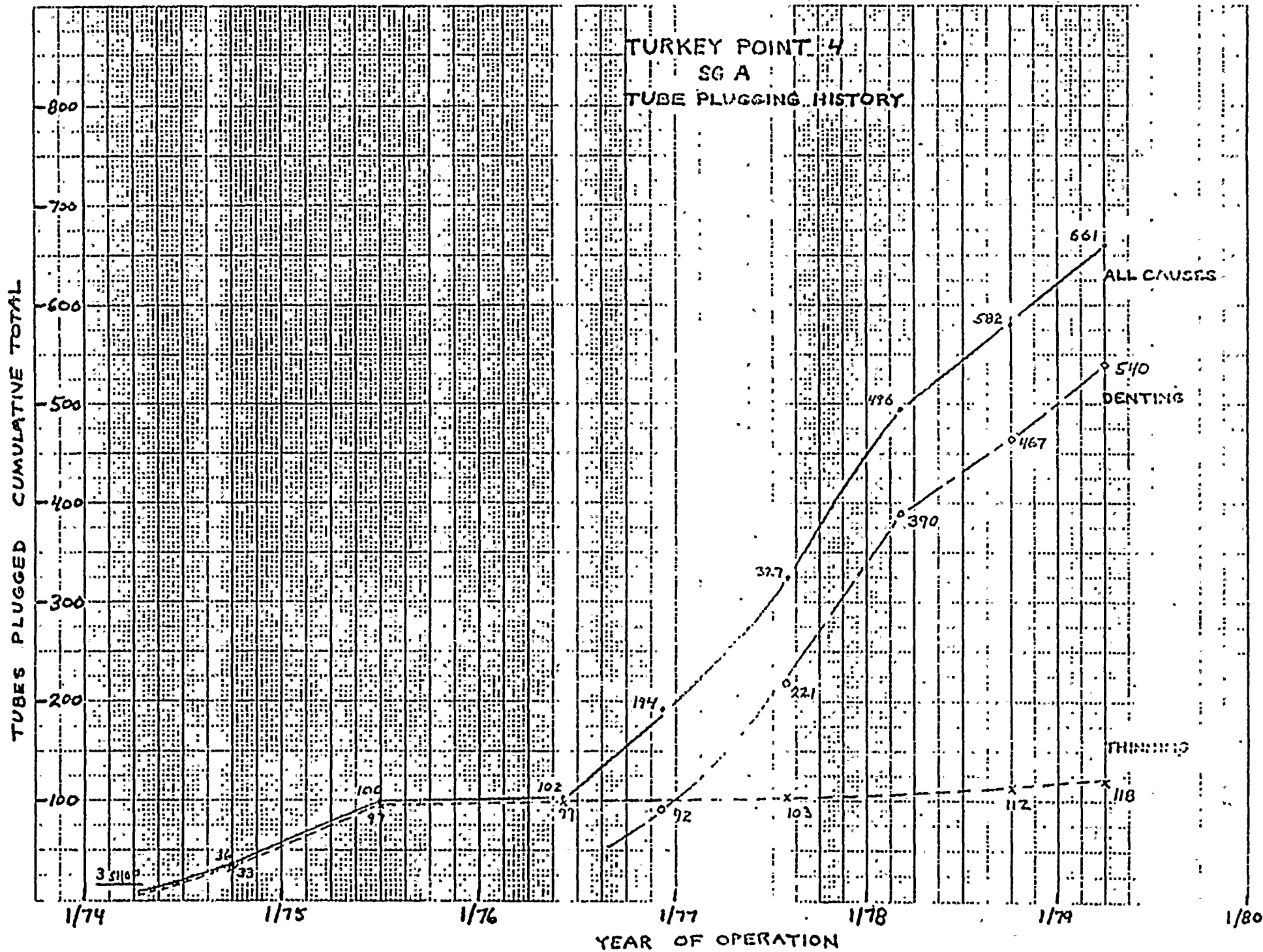


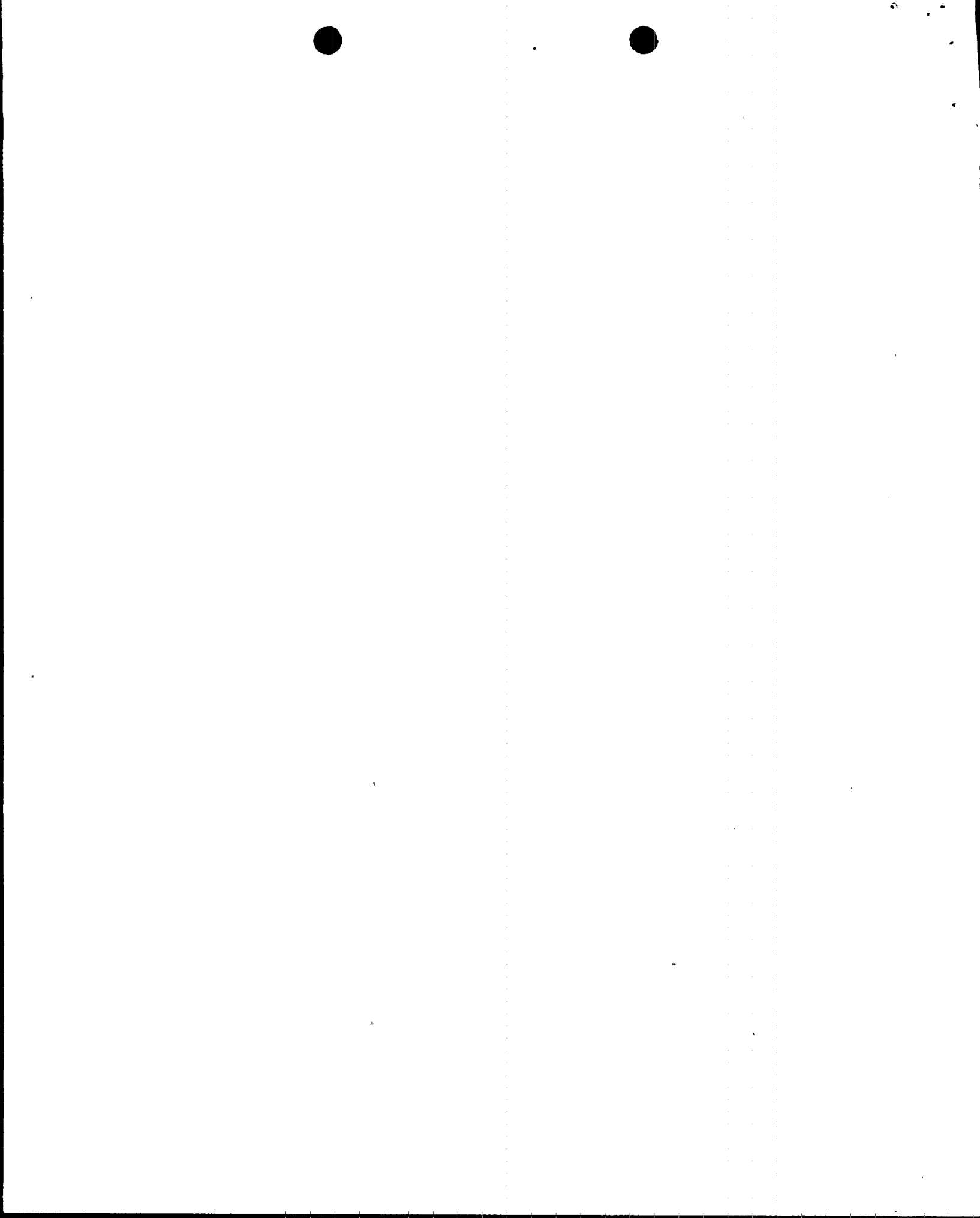
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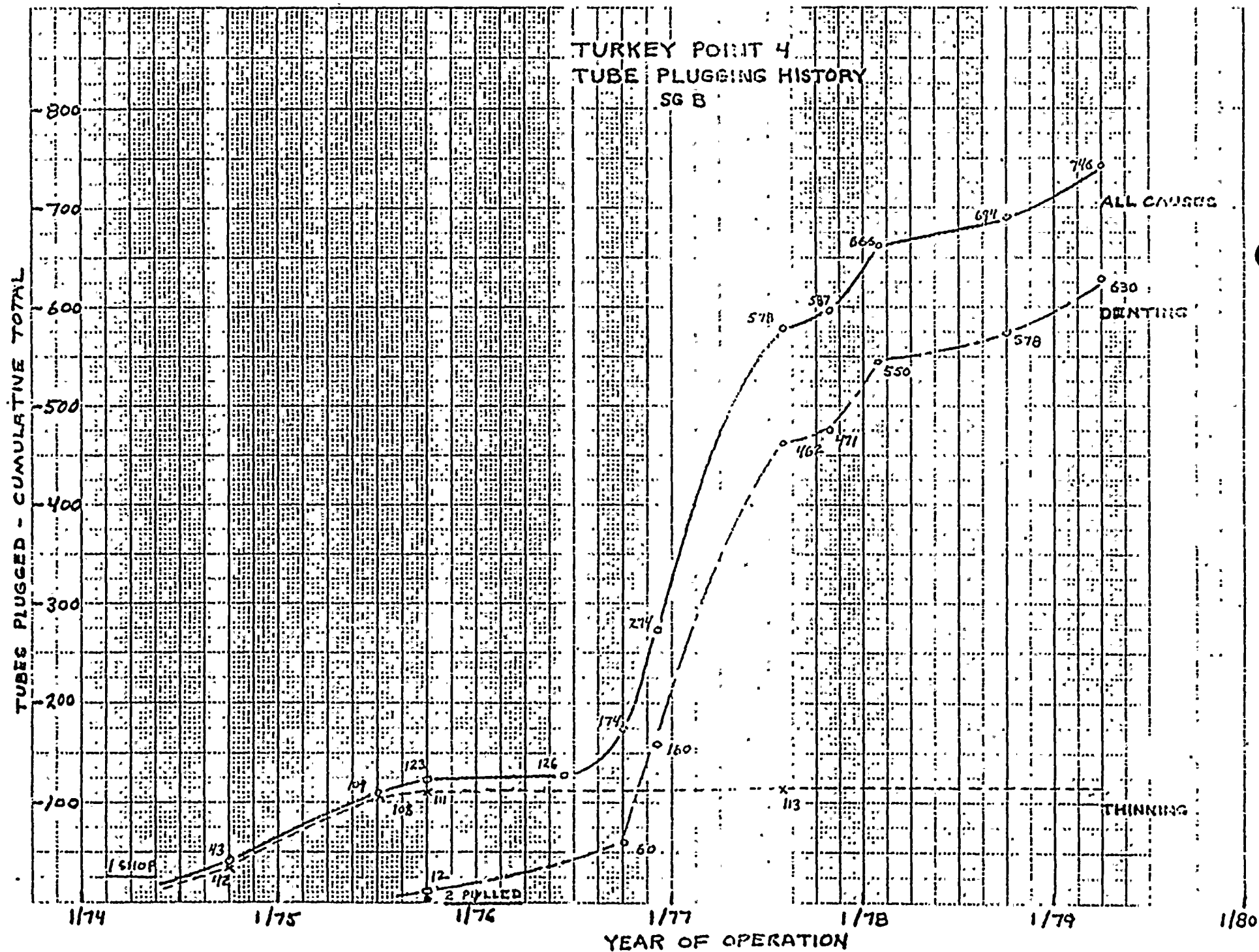
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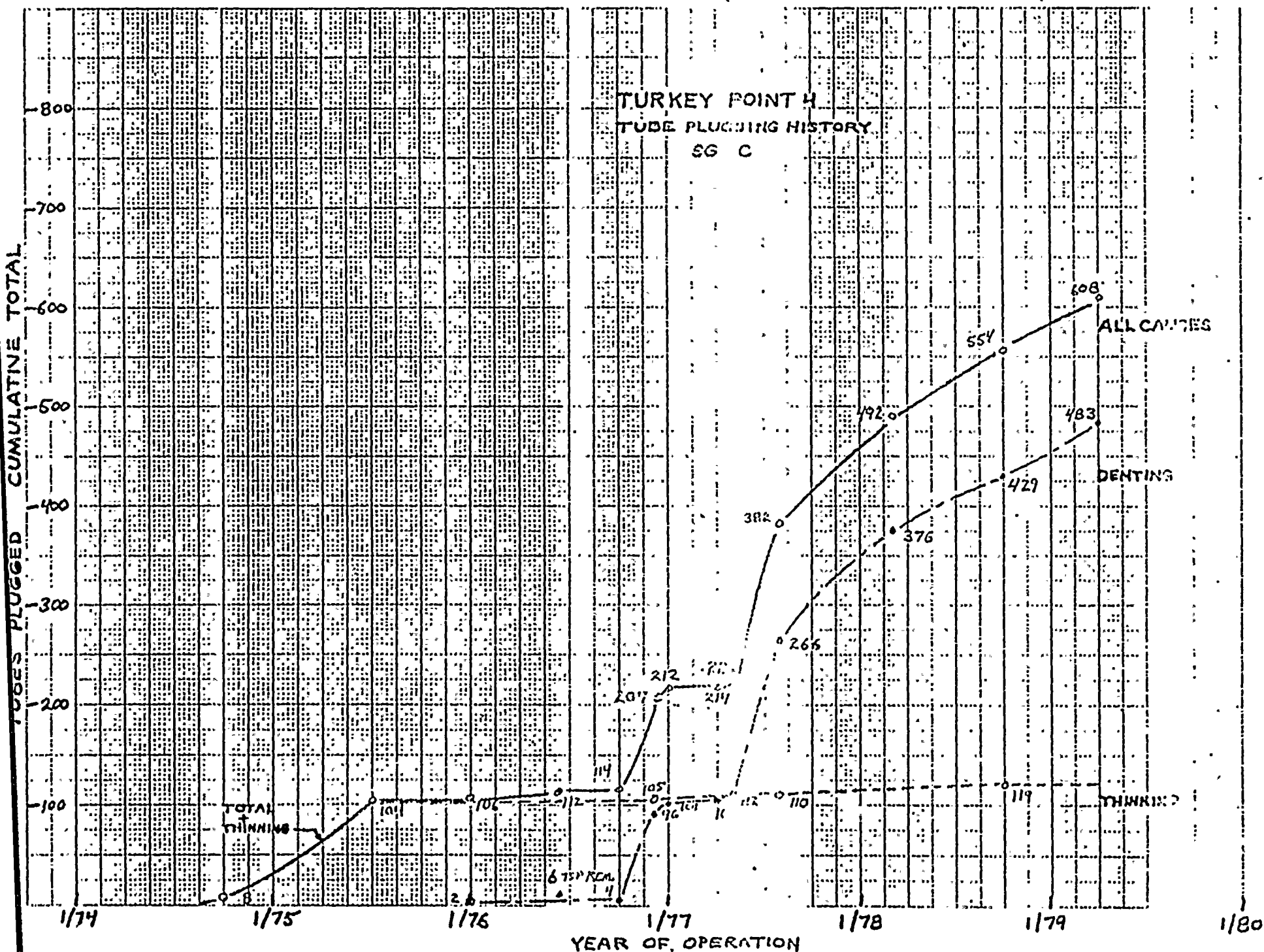
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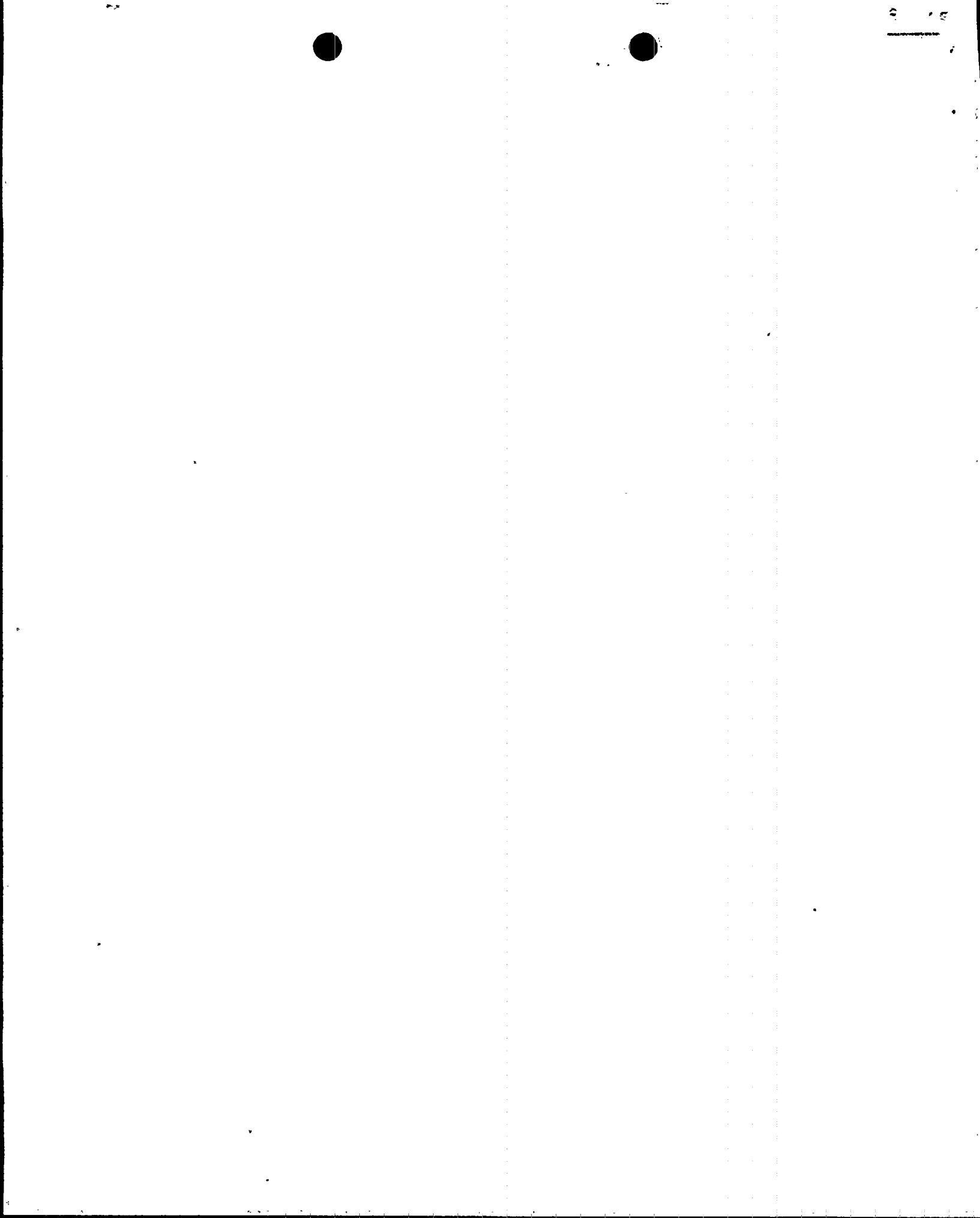
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3/18/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN RE: THE MATTER OF :

Docket Nos. 50-250-SP
50-251-SP

FLORIDA POWER & LIGHT
COMPANY,
(Turkey Point Nuclear
Generating Units Nos. 3 & 4)

(Proposed Amendments to
Facility Operating License
To Permit Steam Generator
Repair)

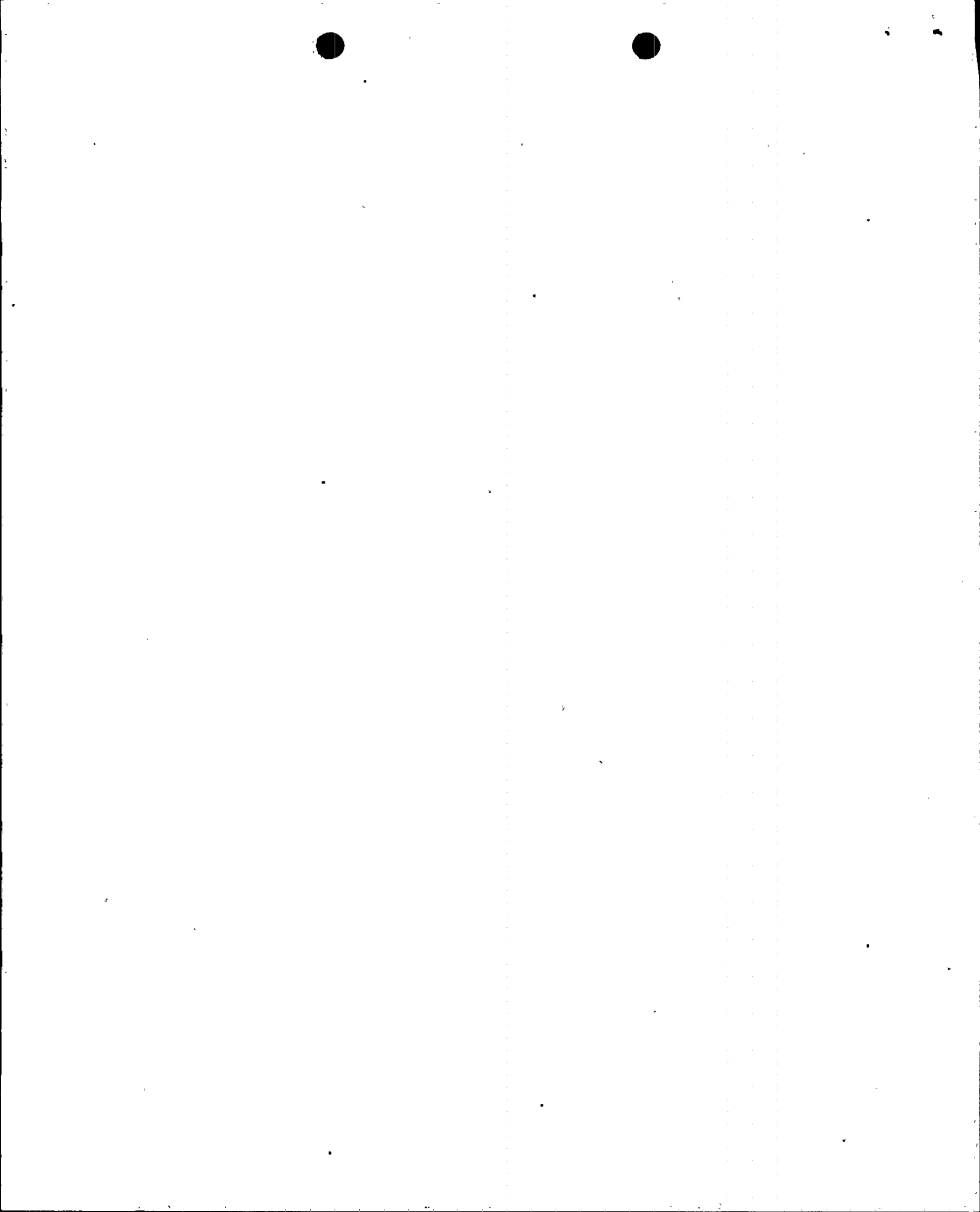
INTERVENOR, MARK P. ONCAVAGE'S REQUEST
FOR THE PRODUCTION OF DOCUMENTS FROM
LICENSEE, FLORIDA POWER AND LIGHT COMPANY

Pursuant to 10 CFR §§2.740 and 2.741, Intervenor, MARK
P. ONCAVAGE, requests the production by Licensee, FLORIDA
POWER AND LIGHT (FPL), of the following documents:

I. DEFINITIONS

1. "You" or "your" means Licensee corporation, any
subsidiary or division owned or controlled in whole or in
part, any property or interest owned or controlled in whole
or in part, any predecessor or successor entity, any agent,
attorney, consultant, employee, representative or officer
acting on behalf of corporation or entity.

2. "Document" means each tangible thing recording or re-
producing, in any manner, any visual or auditory data in your
possession, control or custody, including without limiting the
generality of its meaning, correspondence, memoranda, transcripts,
photographs, stenographic or handwritten notes, studies,
evaluation, analyses, reports, reviews, working papers, books,
charts, telegrams, pamphlets, pictures, video or audio tapes,
voice recordings, computer tapes, printouts or cards, microfilming,



microfiches, and any papers on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy where the original is not in the possession, control or custody of plaintiff, and shall mean every copy of every document where such copy is not an identical copy of an original.

II. INSTRUCTIONS

A. In producing these documents, you are requested to furnish all documents known or available to you regardless of whether these documents are possessed directly by you, or by your agents, employees, representatives, or investigators, or by your attorneys or their agents, employees, representatives or investigators.

B. If any of these documents cannot be produced in full, produce them to the extent possible, specifying your reasons for your inability to produce the remainder and stating whatever information, knowledge, or belief you have concerning the unproduced portion.

C. This Request is a continuing one. If, after producing the requested documents, you obtain or become aware of any further documents responsive to this Request, you are required to produce such additional documents to Intervenor.

D. With respect to those documents as to which you may claim privilege, attorneys' work product or trial preparations, your counsel is requested to identify each such documents in writing on or before the date of production specified below, together with the following information; the nature, date,



subject matter and author of any such document as well as the names and job titles, of all persons to or by whom such document was directed, addressed or received, and the paragraph of this request to which such document responds. Your counsel is further required to set forth as to each document the basis for such claim.

E. The requested documents are to be produced at the offices of Neil Chonin or at such time and place as mutually agreed to by counsel for Intervenor, MARK P. ONCAVAGE, and FLORIDA POWER & LIGHT COMPANY, at which time someone acting on their behalf will examine originals or exact duplicate photographic copies of originals of the documents described below and designate which documents are to be reproduced for them. All documents should be produced in the same order and arrangement as they now exist. In making the production, FLORIDA POWER & LIGHT COMPANY should identify the title of the file drawer, file folder and subfolder in which the documents are contained.

III. DOCUMENTS REQUESTED

1. FLORIDA POWER & LIGHT COMPANY Health Physics Manual. This document is relevant to the subject matter of this proceeding because FPL has indicated that it is of general applicability to Licensee's answers to Intervenor's interrogatories.

2. All documents which embody, refer or relate to Turkey Point Plant Procedures. The Turkey Point Plant Procedures are of general applicability to all of Intervenor's contentions.

Intervenor is therefore in substantial need of all such documents in the preparation of this case.

3. A list of the persons whom you intend to have testify as expert witnesses. Provide the name, address, educational background and professional qualifications of each such person.

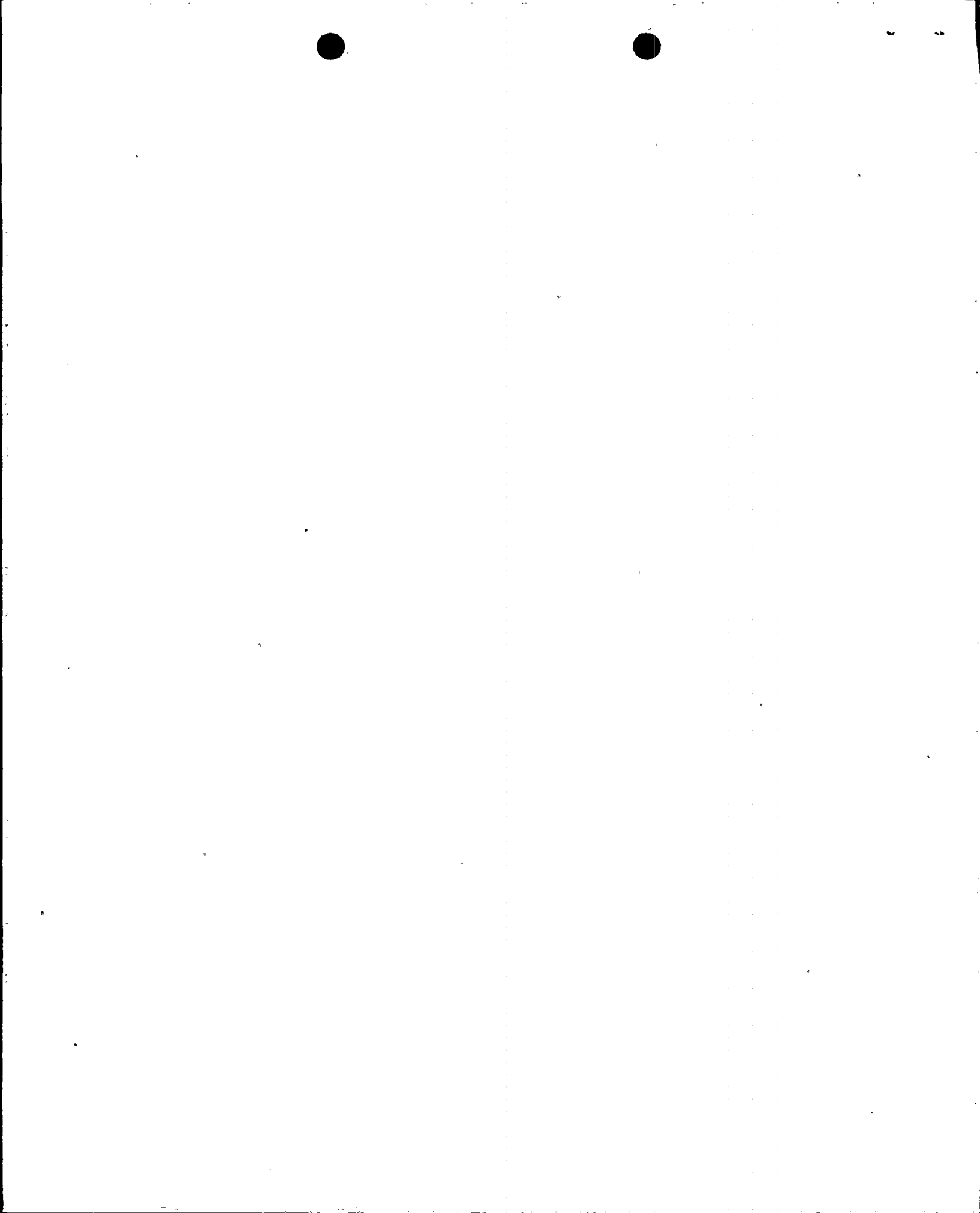
4. All documents which you intend to employ in presenting a direct case on the subject matter of this proceeding.

5. All documents which embody, refer or relate to the Turkey Point Plant approved chemistry specifications for the primary and secondary coolant systems which will be in effect at the time the new assemblies are placed into operation. These chemistry specifications are relevant to Intervenor's Contentions 1 and 14.

6. All documents which embody, refer or relate to inspections or tests that are planned by you to assure containment building and reactor coolant system integrity following the repair, including any revision to the SGRR. Such documents are applicable to Contentions 1, 2 and 3.

7. All documents which embody, refer or relate to local decontamination procedures which will be employed at Turkey Point, during and following the repairs; for equipment, structures and system components. Such documents are relevant to Contention 1.

8. The Turkey Point Plant Emergency Procedure 20106, National Emergencies, the site Emergency Plan and any other procedures which would be followed by you in the event of a



hurricane during or subsequent to the steam generator repair. These documents are relevant to Contention 1.

9. All documents which refer or relate to your determination of the estimated capital costs for: a) the steam generator repair; and b) for operating the Turkey Point Plant before, during and after the repairs. Intervenor is in substantial need of these documents in the preparation of the case as it relates to Contentions 1, 2 and 13.

10. All documents which embody, refer or relate to the planned condensate polishing demineralizer system. Such documents are relevant to Contention 7.

11. A copy of your response to the NRC Staff letter to Dr. Uhrig dated November 19, 1979.

12. All documents which embody, relate or refer to the comparisons of water quality characteristics of Biscayne Bay Water, cooling canal water and Card Sound water regarding the estimates of environmental degradation caused by all aspects of the proposed repairs. The information contained therein is relevant to Contention 7.

13. All documents which embody the following procedures which have been identified by you and are used by you for monitoring surveillance, measurements and testing in the radiological environmental monitoring program:

Procedure
Number

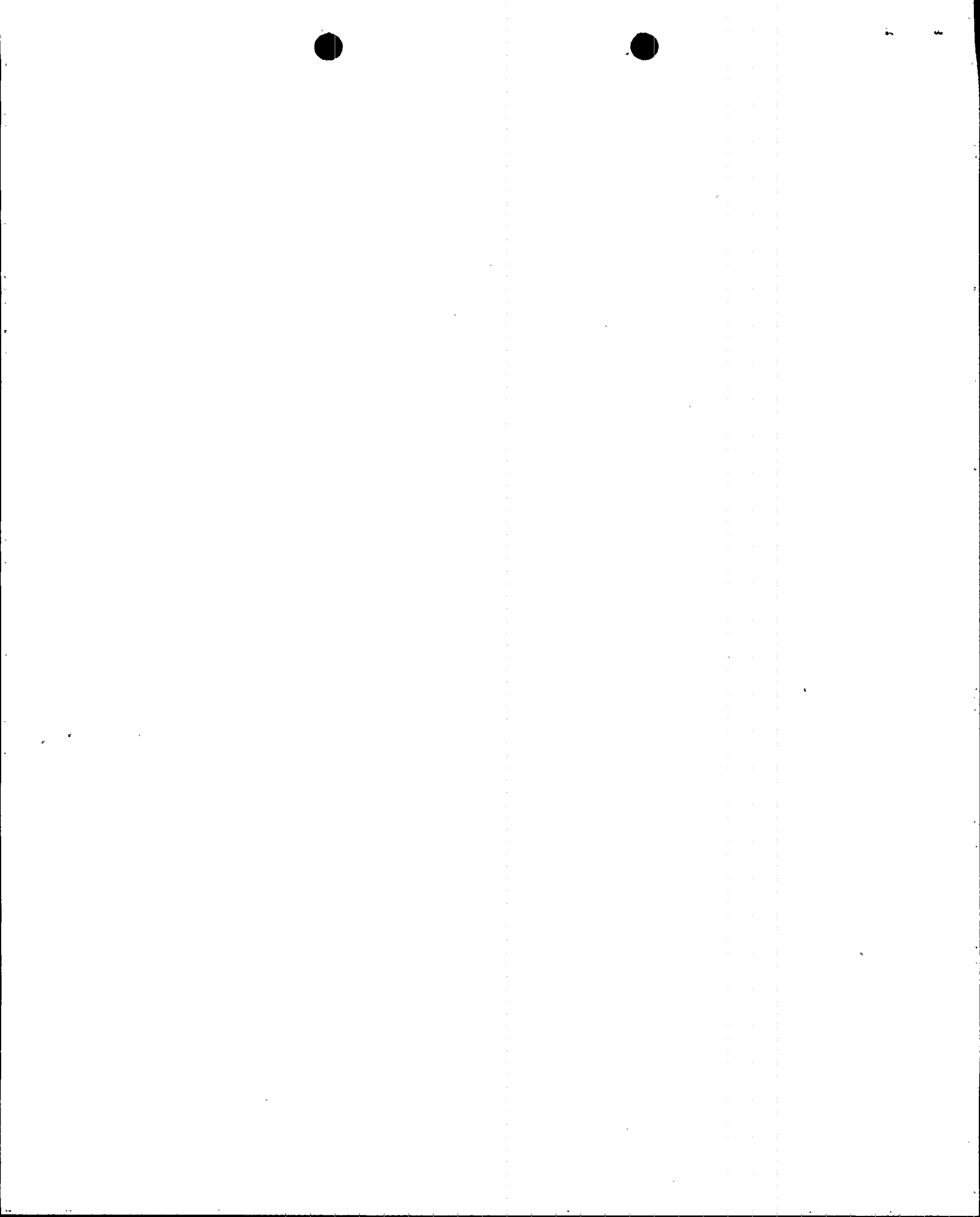
Procedure

A. Quality Control Procedure for Collection, Identification and Reporting of Intralaboratory Quality Control.

- B. Quality Control Procedure for Analysis and Reporting of Intralaboratory Quality Control.
- I. Sampling Procedure for Air Sampling.
- II. Sampling Procedure for Biota Sampling.
- III. Sampling Procedure for Gamma Background.
- IV. Sampling Procedure for Water and Precipitation.
- V. Sampling Procedure for Vegetation.
- VI. Sampling Procedure for Food Crops.
- VII. Sampling Procedure for Silt.
- VIII. Sampling Procedure for Soil.
- IX. Sampling Procedure for Algae.
- X. Sampling Procedure for Milk.
- XI. Sampling Procedure for Collecting and Identifying Samples for Intralaboratory Quality Control Program.
- XII. Sampling Procedure for Annual Garden Census.
- XIII. Sampling Procedure for Milk-Semi Annual Dairy Animal Census.
- 1. Calibration of Thermoluminescent Dosimeters.
- 2. Calibration of Nuclear-Chicago Proportional Counter.
- 3. Calibration of Hewlett Packard Gamma Analyzer.
- 4. Calibration of Packard Tri-Carb Liquid Scintillation Spectrometer.
- 7. Calibration of Rockwell Gas Meters.
- 8. Calibration of Ion Chambers.

The foregoing procedures are relevant to Contention 9.

14. The reports containing the test results of all environmental radiological sampling and analyses done since Turkey Point Units 3 and 4 began operations. This information



is relevant to Contentions 9 and 11.

15. The Turkey Point Technical Specifications and all other documents which embody, refer or relate to descriptions of the frequency, locations and dates of the most recent employment of the monitoring procedures listed in Request #13.

16. All documents which embody, refer or relate to the Critical Path Network Method and all other methods used by you to determine outage time. These documents are relevant to Contention 11.

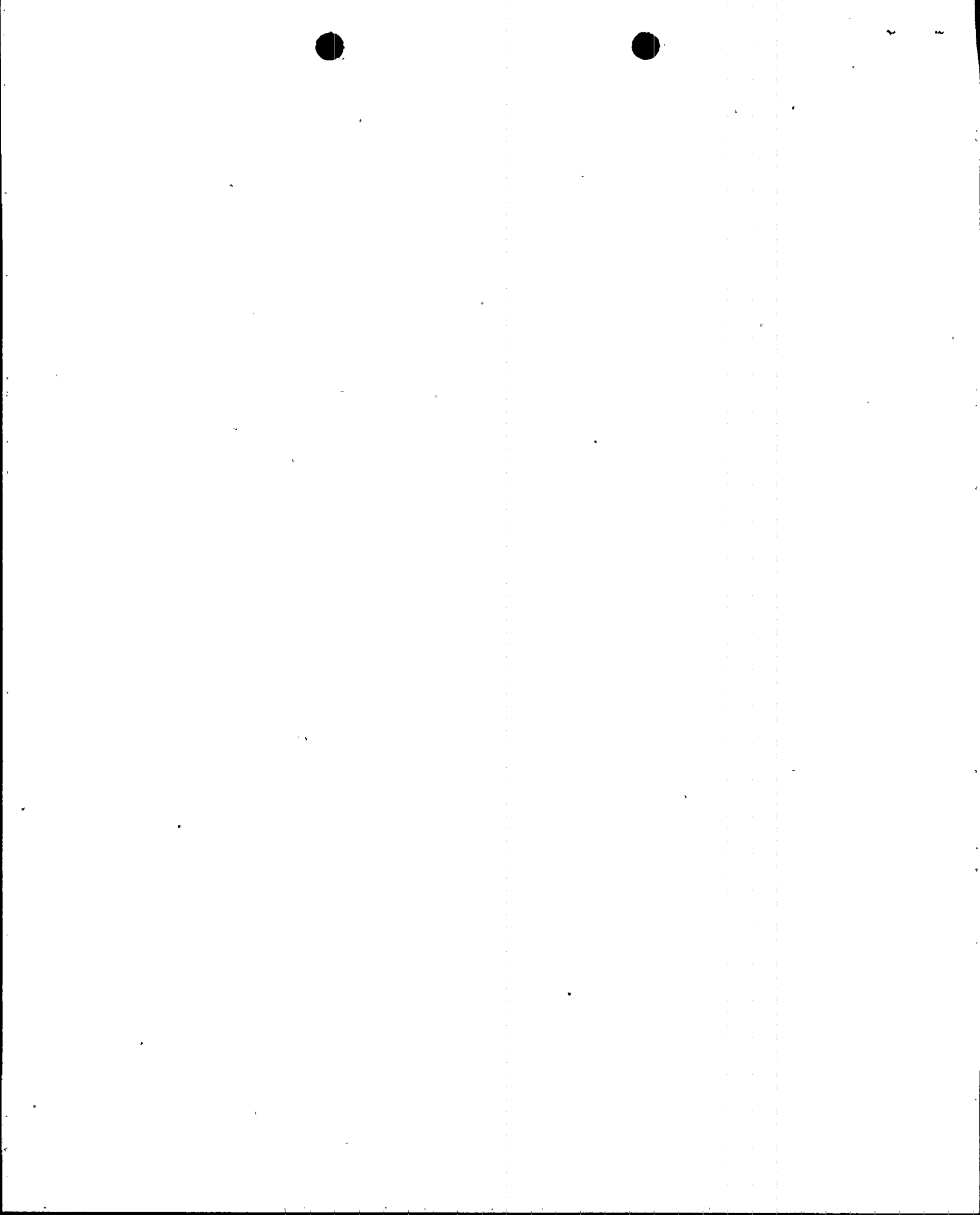
17. All documents which embody, refer or relate to The Turkey Point Plant Area Radiation Monitoring System and Process Monitoring System and any other monitoring systems which will be employed by you during the repairs. These documents are relevant to Contention 13.

18. All documents which embody, refer or relate to the design and specifications of the CUCS Holdup Tanks, including but not limited to blueprints, safety evaluations, and studies relating to durability. These documents are relevant to Contentions 13 and 3.

19. All documents which embody, refer or relate to procedures employed by you in the event of a fire at Turkey Point Plant, including but not limited to Turkey Point Emergency Procedure 20107. These documents are relevant to Contention 14.

20. All documents which embody, refer or relate to your load forecast used to plan future generating units, including but not limited to FPL's Ten Year Power Plant Site Plan 1979-1988.

21. All documents which embody, relate or refer to the details, progress, results and future projections of any



energy conservation measures undertaken or planned by you.

22. The report by Dr. Robert Kunin entitled Disposal of Spent Powdex Ion Exchange Materials. This report is relevant to Contention 7.

23. All documents which embody, refer or relate to all studies or reports on demineralizer effluents which you have relied upon in making decisions concerning the proposed repairs.

24. The document cited in the SGRR entitled "Decontamination of a PWR Primary System, SENA Plant," Volume 33, Proceedings of the American Power Conference, 1971.

25. All documents which embody, refer or relate to any warranty agreements between you and Westinghouse Electric Corporation pertaining to the new steam generator lower assemblies.


To the best of Intervenor's knowledge, the foregoing documents are not available in FPL's Local Public Document Room. Intervenor is therefore unable without undue hardship to obtain the substantial equivalent of these materials by means other than this Request for Production.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 18th day of March, 1980 to the attached list of addressees.

LAW OFFICES OF NEIL CHONIN, P.A.
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Atomic Safety and Licensing Appeal Board Panel
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