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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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 RECIP.NAME RECIPIENT AFFILIATION
 VARGA,S.A. Operating Reactors Branch 1

SUBJECT: Responds to 800530 ltr requesting info on auxiliary
 feedwater sys, Attachment 2 provides addl info to suppl
 791220 response.

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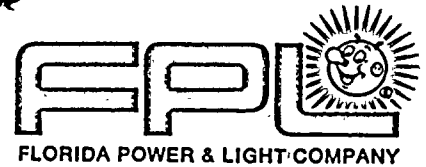
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July 22, 1980
L-80-229

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

Dear Mr. Varga:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Auxiliary Feedwater System

The attached information is submitted in response to your letter of May 30, 1980. Attachment 1 contains information that specifically addresses the open items discussed in your letter. Attachment 2 provides additional information to supplement our previous response dated December 20, 1979 (L-79-354).

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/pa

Attachments (2)

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

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ATTACHMENT 1

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Auxiliary Feedwater System

Generic Short-Term Recommendation 4 (GS-4)

In their May 30, 1980 letter, the NRC staff suggests that Florida Power & Light Company (FPL) revise the Turkey Point Technical Specifications associated with Condensate Storage Tank (CST) level to make them more consistent with the Westinghouse Standard Technical Specifications (STS). In general, we find conversion to the STS a difficult task because Turkey Point Units 3 & 4 were designed and constructed well before the STS were officially promulgated, and the organization of the existing Technical Specifications is different from the STS.

For the specific case in question, Technical Specification 3.8.3 requires that a reactor be shutdown and cooled down if CST volume remains below a specified limit for longer than 48 hours. Under realistic operating conditions, there should be adequate CST water available during the 48 hour grace period to provide adequate protection for the Auxiliary Feedwater (AFW) pumps. The AFW pumps can take suction from either of two CST's through non-return check valves that automatically direct flow to the pumps from the highest CST. Therefore, even if one CST was below the minimum specified volume, the second CST would be available to supply the AFW pumps.

For cases where one CST is low, or both CST's are low, Operating Procedure 7300.3 has been written to guide the operators in providing make-up water from the condenser hotwell, the Primary Water Storage Tanks (PWSTs), or the fire main system. (The fire main system would only be used in an emergency.) In addition, a 500,000 gallon deaerated water storage tank is being constructed that will be available to supply, among other things, the CST's and the AFW pumps. Furthermore, with appropriate operator action, fossil Units 1 and 2 can also be used to supply feedwater to the Units 3 & 4 steam generators.

Although multiple sources of CST make-up and AFW pump supply (as described above), combined with instructions to licensed operators to maintain acceptable CST levels or take appropriate action, provide sufficient control to ensure an adequate supply of condensate, we have determined that an additional Technical Specification, requiring more immediate corrective action at some CST volume below what is now specified, would be appropriate. We are in the process of writing such a specification and plan to have a draft by August 15, 1980 to forward to our on-site and off-site safety review committees. The revisions generally take about 30 days, therefore, we have established September 30, 1980 as the anticipated submittal date.

ADDITIONAL SHORT-TERM RECOMMENDATION 2

The AFW pump endurance test was performed on June 20, 1980. A copy of the completed test procedure will be forwarded under separate cover.

GENERIC LONG-TERM RECOMMENDATION 3 (GL-3)

A modification to the steam supply valves is planned. Two of the three valves will be converted to DC power. A January 1, 1981 implementation date is scheduled, however, the DC operators will be installed as soon as practical pending material availability and unit outage time.

ATTACHMENT 2

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Auxiliary Feedwater Pumps

Generic Short-Term Recommendation 5 (GS-5)

During certain test evolutions, an operator is stationed at the AFW pumps. In order to eliminate the need for a local operator, an electrical modification is planned by January 1, 1981 (pending material availability) to allow AFW pump start signals to override test situations. More specifically, an operator will be able to "switch out" two AFW pumps (bypass the control circuitry) so that the third pump can be tested, however, an override capability will exist to ensure that AFW flow is available automatically in case of an AFW pump start signal. The decision to pursue this modification has also eliminated the need for DC lighting at the local AFW pump station and for a sound powered phone link between the local station and the Control Room.

In addition, a modification is planned to provide lube oil cooling flow from the discharge of the AFW pumps. This modification, combined with the conversion of two steam supply valves to DC power, eliminates the need for a local operator on loss of AC power.

In the interim, procedures have been in place since March 31, 1980 to:

- 1) provide a local operator at the AFW pump station for those operational situations when local operation may be needed,
- 2) provide for a cooling water supply from the CST to the lube oil cooler, and
- 3) provide for manual operation of the AFW system.

ADDITION SHORT-TERM RECOMMENDATION 1

The FPL submittal of December 20, 1979 was in error regarding the redundancy of Condensate Storage Tank (CST) level indication and alarms. The information provided herein supersedes the December 20 information.

A redundant CST level indication system with associated low level alarms is being designed. The system is scheduled to be operable by January 1, 1981, pending material availability and unit outage time.

ADDITIONAL LONG-TERM RECOMMENDATION 3

Procedures will be in place by January 1, 1981 to provide operator direction regarding isolation of AFW system steam line or feedwater line piping breaks. Procedures regarding unit shutdown using other available means will also be in place by January 1, 1981.

In conjunction with the above procedures, steam and feedwater piping modifications are being developed to ensure redundancy in what are now common sections of piping. The modifications are planned during the upcoming Unit 4 steam generator replacement outage, currently scheduled to begin in the Fall of 1981.