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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME: AUTHOR AFFILIATION:
 UHRIG, R.E. Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION:
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards response to 801031 ltr re NUREG-0737 implementation status of post TMI requirements.

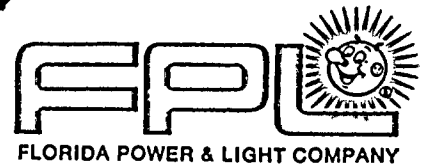
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December 26, 1980
L-80-419

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

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4
Docket No. 50-250 & 50-251
Post-TMI Requirements

We have reviewed your letter of October 31, 1980 which transmitted NUREG 0737. Based on that review, we have found a few cases where our plans and schedules do not coincide with those in Enclosure 1. A description of these cases and the bases for our plans and schedules are attached. We are working towards meeting all of the remainder of the requirements within the required dates, and will advise you should problems arise in meeting the long-term dates. We are also available to meet with you to discuss our plans and status regarding NUREG-0737 implementation.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

JEM/pah

Attachment

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

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US NRC - PROJECTS

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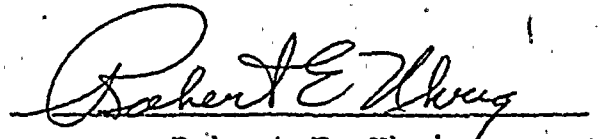
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STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

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

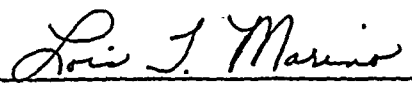
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

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

26th day of December, 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 AUGUST 24, 1981
BONDED THRU MAYNARD BONDING AGENCY

RECEIVED
JAN 10 1964
U.S. DEPT. OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C.

ATTACHMENT

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Post-TMI Requirements

1. TECHNICAL SPECIFICATIONS

A proposed Technical Specification amendment has been prepared in response to an NRC letter dated July 2, 1980 (implementation of TMI Lessons Learned Category A items). The proposal is being reviewed by our off-site review committee and will be submitted upon final approval by that committee.

We understand that additional model Technical Specifications are being developed by the NRC Staff, and that they will be issued after issuance of the final TMI Action Plan requirements package. We will consider proposing additional Technical Specification amendments following receipt and review of the final requirements package.

2. Shift Manning (I.A.1.3)

We have implemented the overtime restrictions as described in the July 31, 1980 letter from D. G. Eisenhower with the clarifications in NUREG-0737, for our SRO's, and RO's. It is our opinion that the overtime situation for other plant personnel involved in safety-related actions is sufficiently different such that we do not plan any additional overtime restrictions at this time.

Historically, overtime is concentrated during refueling shutdowns, major plant modifications, and periods of major maintenance, conditions which are excluded from overtime restrictions by NUREG 0737. In addition, in many cases we have limited numbers of people specializing in maintaining a complex piece of equipment, and our previous operating history shows that occasional overtime extending beyond the new NRC limits is effective and does not impair safe operations.

3. ACCIDENT REANALYSIS (I.C.1)

The Westinghouse Owners Group will submit by January 1, 1981, a detailed description of our program to comply with the requirements of Item I.C.1. The program will identify Owners Group's previous submittals to the NRC. These will comprise the bulk of the response. Additional effort required to obtain full compliance with this item (with proposed schedules for completion) will also be identified, as discussed with the NRC on November 12, 1980.

4. OPERATION VERIFICATION PROCEDURE (I.C.6)

Due to the manpower requirements of our current refueling outage, and the need for interfacing activity with both our nuclear plants this requirement will be implemented by 3/1/81.

5. REACTOR COOLANT SYSTEM VENTS (II.B.1)

We plan to provide the design description of the RCS Vent System as required by NUREG-0737. However, we will postpone development of operating procedures until such time that the design is approved. Procedures for operation will then be developed and submitted.

6. TRAINING FOR MITIGATING CORE DAMAGE (II.B.4)

The required training program is under development. We expect to implement the program in accordance with the NUREG 0737 schedule.

7. SAFETY/RELIEF VALVE TESTING (II.D.1)

"As a sponsor of the EPRI PWR Safety and Relief Valve Test FPL intends to comply with the requirements of NUREG 0578, Item 2.1.2. By letter dated December 15, 1980, R. C. Youngdahl of Consumers Power Company has provided the current PWR Utilities' positions on NUREG 0737, Item II.D.1 clarifications. Briefly those positions are:

- A. Safety and Relief Valves and Piping- the EPRI "Program Plan for Performance Testing of PWR Safety and Relief Valves", Revision 1, dated July 1, 1980, does provide a program that satisfies the NRC requirements. Discussion with the NRC staff and their consultants are resolving specified detailed issues.
- B. Block Valves - The EPRI Program has not formally included testing block valves. However, a small number of block valves have been tested at the Marshall Steam Station Test Facility. The PWR Utilities and EPRI can not provide a detailed block valve test program until results of the Wyle and CE relief valve tests are available. Therefore, a block valve test program will not be provided before July, 1981. The PWR Utilities and EPRI believe that the proper operation of the TMI-2, and Crystal River block valves and other operational experience, plus knowledge of the Marshall tests, support a less hurried and more rational approach to block valve testing.
- C. ATWS Testing - PWR Utilities will not support additional efforts for ATWS valve testing until regulatory issues are resolved. The major safety and relief valve test facility (CE) is nearing completion and some measures were taken to provide additional test capability beyond the current program requirements. The NRC should recognize that results from the current program are likely to provide most of the information necessary to address ATWS events (i.e. relief capability at high pressures)."

8. VALVE POSITION INDICATION (II.D.3)

The equipment required to provide valve position indication is currently installed and operational. Our vendor is currently performing final environmental qualification tests which are scheduled for completion by December, 1980 and a report will be transmitted as soon as practical. The equipment has been qualified seismically, radiologically and meets both functional and thermal aging requirements.

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16 6 3 1 2 1 1 1

9. AFW SYSTEM EVALUATION (II.E.1.1)

- A. L-80-22, dated January 19, 1980 and L-80-229, dated July 22, 1980 committed to various modifications in the Auxiliary Feedwater System to be completed by 1/1/81. NUREG 0737 then extended these dates to 7/1/81. We will meet commitments in all areas except for modifications regarding the Lube Oil System and changing the power supply to DC on the steam supply MOV's. We are experiencing equipment delivery problems impacting these areas, and modifications will be made no earlier than September, 1981.
- B. The analyses required to document the design bases system flow requirements for the AFW are underway by our NSSS vendor and will be supplied upon completion.

10. AFW SYSTEM EVALUATION (II.E.1.2)

Our Architect-Engineer is preparing the required design description. This documentation will be available by 1/30/81.

11. CONTAINMENT ISOLATION DEPENDABILITY (II.E.4.2)

- A. Some of the shorter term modifications originally planned for completion by January 1, 1981 have been rescheduled due to longer than expected lead times for safety related valves. Delivery of some valves may be extended beyond 12 months, in which case this item would be fully completed during scheduled outages in 1982.
- B. We are evaluating the requirement of lowering the containment pressure setpoint for containment isolation. However, pending additional evaluation, we cannot concur with the clarification statement that 1 psi above normal operation pressure is an appropriate or necessary minimum pressure setpoint. Due to the implications of making changes in this setpoint, our evaluation will not be completed until 7/1/81, and modifications, if any, will be performed by 1/1/82.

12. INSTRUMENTATION FOR ICC (II.F.2)

- A. The addition of dual RTD instrumentation to the Unit 3 subcooling margin monitor is delayed due to problems with equipment delivery. The RTD's will be installed during the next refueling outage. The Unit 4 modification will be completed during the current refueling outage.
- B. In addition we are participating in the C-E Owner's Group effort in evaluating reactor-water-level indication as a part of our evaluation of ICC. A detailed description of our plans for ICC will be forthcoming upon the completion of that effort.

13. REPORT ON PORV FAILURES & AUTO-PORV ISOLATION (II.K.3.2 & II.K.3.1)

The Westinghouse Owners Group is in the process of developing a report (including historical valve failure rate data and documentation of actions taken since the TMI-2 event to decrease the probability of a stuck-open

PORV) to address the NRC concerns of Item II.K.3.2. However, due to the time-consuming processing of data gathering, breakdown, and evaluation, this report is scheduled for submittal on March 1, 1981. This report will be used to support a decision on the necessity of incorporating an automatic PORV isolation system as specified in Task Action Item II.K.3.1.

14. REPORTING SV & RV CHALLENGES (II.K.3.3)

The required report will be included in our Annual Operating Report.

15. AUTO TRIP OF RCPS (II.K.3.5)

The Westinghouse Owners Group resolution of this issue has been to perform analyses using the Westinghouse small break evaluation model (WFlash) to show ample time is available for the operator to trip the reactor coolant pumps following certain size small breaks (see WCAP-9584). In addition the Owners Group is supporting a best estimate study using the computer code to demonstrate that tripping the reactor coolant pump at the worst trip time, after a small break will lead to acceptable results.

For both of these analysis efforts, the Westinghouse Owners Group is performing blind post-test predictions of Loft experiment L3-6, the input data and model to be used with WFlash on Loft L3-6 has been submitted to the NRC on 12/1/80 (NS-TMA-2348), the information to be used with on Loft L3-6 will be submitted prior to performance of the L3-6 test as stated in letter OG-45 dated 12/3/80.

The Loft prediction from both models will be submitted to the NRC on February 15, 1981 given that the test is performed on schedule, the best estimate study is scheduled for completion by April 1, 1981.

Based on these studies, the Westinghouse Owners Group believes that resolution of this issue will be achieved without any design modifications, in the event that this is not the case, a schedule will be provided for potential modifications.

16. SMALL BREAK LOCA ANALYSES (II.K.3.30)

We concur with the Westinghouse position described in letter NS-TMA-2318 of September 26, 1980 from Mr. T. M. Anderson, Manager, Nuclear Safety Department to Mr. D. G. Eisenhut, Division of Licensing.

17. EMERGENCY PREPAREDNESS (III.A.2)

The Florida Radiological Emergency Plan for Nuclear Power Facilities includes (or will include) the Dade, Monroe, Martin and St. Lucie County radiological emergency plans. Since these plans are not completed, certain aspects of the Plan which will be submitted by January 1, 1981, must be considered subject to revision prior to the scheduled implementation date of April 1, 1981.

We are currently investigating various alternatives regarding the Public Warning System. Following completion of the investigation we will consult with local governmental officials to determine future action.

18. CONTROL ROOM HABITABILITY (III.D.3.4)

Our Architect-Engineer is preparing the required report, which will be submitted by 5/1/81.

THE UNIVERSITY OF CHICAGO

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