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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: UHRIG, R.E. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: VARGA, S.A. RECIPIENT AFFILIATION: Operating Reactors Branch 1

SUBJECT: Submits addl info re steam generator repair, including disposal of spent resins from condensate polishing demineralizer, filling & grading of area within security fence & steam generator lower assembly shipment.

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 TITLE: Steam Generator Feedwater Flow Instability (Water Hammer) (USI A-1)

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	I&E	06	2	2	NRC PDR	02	1	1
	OELD	14	1	1	OP EX EVAL BR08		1	1
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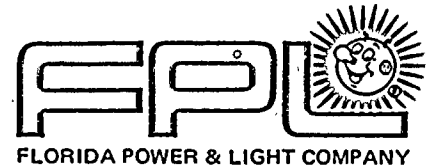
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March 13, 1981
L-81-117

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 and 4
Docket Nos. 50-250 and 50-251
Steam Generator Repair

In response to requests made in various telephone conversations by Mr. Marshall Grotenhuis of your branch, we submit the following additional information about the steam generator repair for Turkey Point Units 3 and 4:

Disposal of Spent Resins from the Condensate Polishing Demineralizer for Turkey Point

It is FPL's position that installation of the condensate polishing demineralizer system at Turkey Point 3 and 4 should not be within the scope of the licensing proceedings for the steam generator repair. The condensate polishing demineralizers have utility independent of the repairs, and will be installed whether or not the repairs are approved. The NRC staff has concluded that the condensate demineralizers are not within the scope of the repair project.*

Spent resins from the demineralizer system would not be radioactively contaminated unless leakage occurs from the primary cooling system to the secondary system. If the resins are found to contain radioactive isotopes above regulatory limits, they would be shipped to a radioactive waste burial ground.

Although non-radioactive spent resins are suitable for land burial, FPL does not presently plan to bury spent resins at the Turkey Point site. Should it become desirable to do so, the projected impact of this activity on the crocodiles and their habitat is expected to be no greater than those resulting from normal operations and outages. Nevertheless, FPL will commit to including in its procedures, before the demineralizer system is operated, a requirement to notify the NRC before the resins are buried.

*See Updated Safety Evaluation for the Turkey Point Units 3 and 4 Steam Generator Repair (December 17, 1980), Section 3.2.4.

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Filling and Grading of Area within Security Fence

As was indicated in our comments on the Draft Environmental Statement,* a portion of the area south of the Unit 4 turbine and containment buildings, of the radwaste building, and of the ash disposal pits, and north of the security fence (see SGRR, fig. 3.1-2) has been recently filled and graded to elevation plus 17.5'. The filling operation included the replacement of non-load bearing material with structural fill. FPL plans to construct several buildings in this area. These buildings include a dry storage warehouse, a new service building for administrative offices for Units 3 and 4, a larger guard house, and a proposed future operating stores warehouse. If the steam generator onsite storage alternative is selected, the steam generator storage compound (SGSC) would also be constructed in this area.

The purpose of the filling operations was to bring this area to the same elevation as the plant power bloc. In addition to providing an area on which to construct the above mentioned buildings, it will provide additional lay down space for materials and equipment used for inspection, maintenance, and refueling outages. The buildings (other than the SGSC) have uses independent of the steam generator repair, and the entire filling operations would have been conducted independent of the repair.

Shipments of Steam Generator Lower Assemblies

If the alternative of shipping the steam generator lower assemblies (SGLA's) to Barnwell, S.C. for burial is chosen, FPL intends to comply with all regulations governing such shipments. FPL plans to ship the SGLA's packaged inside a 2½ inch thick steel shipping cask which will have been duly licensed by the U.S. Nuclear Regulatory Commission. Each SGLA will be decontaminated before placing it inside the cask to meet Department of Transportation (DOT) regulations on acceptable levels of contamination on external surfaces of the SGLA. Each packaged SGLA will meet DOT regulations on acceptable rates of emission of radiation from package surfaces. It is also planned, as a precaution beyond regulatory requirements, that a health physicist will accompany these shipments to periodically verify compliance with radiological requirements.

A Memorandum of Understanding among various governmental authorities is not appropriate. The U.S. Coast Guard/DOT has jurisdiction of such shipments in navigable waterways such as Biscayne Bay; therefore, FPL intends to comply with its regulations regarding, among other things, notification, routing, and weather conditions. FPL will also notify any other agencies which it is required by law, or which it finds desirable, to notify.

The proposed route is one used for other commercial shipments. Each shipment will proceed northeast from Turkey Point via private FPL channel to Biscayne Bay, then north via Biscayne Channel and Featherbed Bank, then through the Miami Harbor Channel to the Atlantic Ocean, then coastwise north to the Tybee Roads entrance to the Savannah River, then up the river to Johnson's Landing, S.C. This route would bypass the live coral reefs in John Pennekamp Coral Reef State Park and Biscayne National Park.

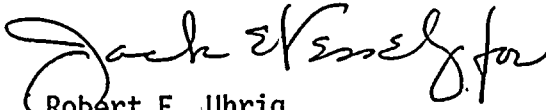
*NUREG 0746 "Draft Environmental Statement Related to Steam Generator Repair at Turkey Point Units 3 and 4," December 1980.

Mr. Steve A. Varga, Chief
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Finally, the barge and its cargo will be approved by a marine insurance surveyor before they leave Turkey Point. It is also expected that the U.S. Coast Guard will inspect the shipments on such frequency as it deems necessary. Both the tug and the barge will have certificates of classification by the American Bureau of Shipping and certificates of inspection by the U.S. Coast Guard, and the tug and barge will be under the control of personnel licensed by the U.S. Coast Guard.

Please notify us if we can be of further assistance.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/LFR/mc

cc: Distribution



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