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SUBJECT: Forwards comments on 801217 updated safety evaluation for
 NUREG-0756 re steam generator repair. Need for primary
 nozzle closure rings being re-evaluated. Rings may or may not
 be installed.

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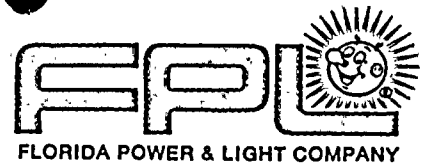
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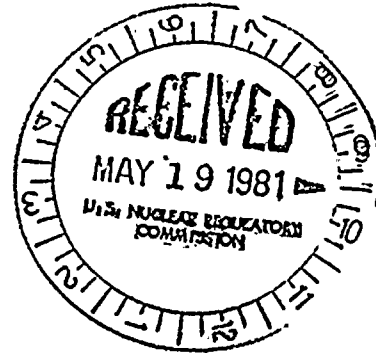
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May 11, 1981
L-81-200

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



Dear Mr. Eisenhut:

Re: Turkey Point Units 3 and 4
Steam Generator Repair
Updated Safety Evaluation

Attached you will find Florida Power & Light Company's comments on the "Updated Safety Evaluation . . . Steam Generator Repair", December 17, 1980.

We thank you for your attention to this matter.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/LFR/ah

Attachments

cc: N. A. Coll, Esquire
J. P. O'Reilly, Director, Region II
Harold F. Reis, Esquire
Mark P. Oncavage
Neil Chonin, Esquire
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FLORIDA POWER & LIGHT COMPANY
COMMENTS ON UPDATED SAFETY EVALUATION (NUREG - 0756)

<u>Page</u>	<u>Paragraph</u>	<u>Statement in SER</u>	<u>Comment on Statement in SER</u>
2-2	1	Also, closure rings will be welded inside the channel head at the base of each primary nozzle so that closure plates can be installed during primary chamber maintenance.	The need for primary nozzle closure rings is being re-evaluated. These rings may or may not be installed, as desirable.
2-3	1	"Additionally, all piping weld and preps, welding, and non-destructive examination will be in accordance with the applicable sections of the latest (sic) edition of the ASME Code."	See Section 3.2.4 of the SGRR, Revision 7. The sentence should be revised to read: "Additionally all piping weld end preps, welding, and non-destructive examination will be in accordance with the applicable sections of ASME Section XI, 1977 Edition with addenda through the summer of 1978."
2-3	3	"The old lower assembly will be removed from the containment building through the existing equipment hatch and transported to a special storage facility that will be constructed on the Turkey Point site."	"The old lower assembly will be removed from the containment building through the existing equipment hatch and transported to a special storage facility that will be constructed on the Turkey Point site, or to a temporary laydown area in the event of shipment offsite."
2-3	5	"Following the channel cut (Fig. 2.1) all steam generator supports will be disassembled and the steam generator lower assembly will be removed from its location and placed on the equipment floor where it will be prepared for storage and shipment."	All steam generator supports will not be removed; some supports will be necessary to support the channel head. Seismic ring only will be removed and reinstalled. It is recommended that "all" be changed to "some".
2-5	1	"A mobile crane will lift the lower assembly onto a transporter that will carry it to the steam generator storage facility on the site."	The SGLA's will not be lifted by a crane onto a transporter, but will be slid on Hillman rollers directly onto the transporter deck. This alternate approach was previously described in the SGRR, Revision 3, Response to Question 6, pg. A-6-1 (April, 1978).

- 2-7 2 "repaired steam generators"
- 2-7 3 "All of the activities associated with the repair activities and return to power have been incorporated into the dose estimates."

- 2-7 5 "These structures include contamination control envelopes around the steam generators, temporary ventilation systems, scaffolding and a temporary platform with guide rails at the equipment hatch to to (sic) facilitate removal of the steam generator lower assemblies."

- 2-7 6 Each enclosure structure (one for each steam generator) will have two windows, a ventilation inlet with roughing filter, a HEPA filter exhaust system, and double-door access area.

Changed to: "new SGLA'S"

The repairs are to be initiated during a period in which a scheduled refueling would take place. Consequently the doses associated with those activities would be incurred whether or not the repairs would be undertaken. It is recommended that this sentence be changed to read:

"All of the activities associated with the repair activities and return to power, other than defueling the reactor, storing the spent fuel in the storage pool, reloading the core, and pre-op and start-up testing have been incorporated into the dose estimates."

It is recommended that this sentence be changed to read: "These structures include contamination control envelopes around the steam generators in the channel head cut area, temporary ventilation systems, scaffolding and a temporary platform with guide rails at the equipment hatch to facilitate removal of the steam generator lower assemblies."

The three enclosure structures will be exhausted in parallel to a single base-mounted filter-exhaust system, which will consist of pre-filters, HEPA filters, and exhaust fan. This system will be tied into the containment purge system.

2-8	3	"The cutting of the channel head will be done by a remote cutting device which follows a track around the steam generator."	Change "remote" to "automatic".
2-8	4	"FPL plans to use remote cutting tools wherever possible to minimize the time personnel stay in radiation areas."	Change "remote" to "automatic".
2-9	1	"Subsequent to completion of the installation of the new lower assemblies, the original steam dome assemblies will be welded to the new lower assemblies to complete the repair."	After submittal of Revision 7 to the SCPR March 28, 1980, FPL determined to refurbish the upper internals. The sentence should be modified to read: "Subsequent to completion of the installation of the new lower assemblies, the original steam dome assemblies will be refurbished with new moisture separator equipment, feed ring, etc. and will then be welded to the new lower assemblies to complete the repair."
2-9	2	"The steam generator wrapper and upper internals will be cut from outside the steam generator after the upper shell has been removed."	The sentence should be changed to read: "The steam generator wrapper will be cut from outside the steam generator after the upper shell has been removed. The upper internals will be cut from inside the steam dome once it has been inverted."
2-9	3	"... its supports will be disassembled ..."	All steam generator supports will not be disassembled. Floor supports will not be disturbed. Seismic ring only will be removed and reinstalled. Change phrase to "... some of its supports will be disassembled ..."
2-9	5	"... installation/removal of hydroplugs ..."	This phrase should be eliminated. FPL will not use hydroplugs; system hydro to be performed.

2-9	6	"To minimize radiation exposure, an automatic welding device will be used. PNL has estimated ⁵ a savings of 860 person-rem per generator (2600 person-rem per unit) based on using remote welding as compared to manual welding. This yields a total PNL estimated exposure of 620 person-rem per unit for the installation phase."	FPL will not use an automatic welding device. These sentences should be deleted.
2-9	6	"FPL has estimated the exposure for this phase to be 644 person-rem per unit."	FPL will not use an automatic welding device, and took no credit for automatic welding in estimating exposure from reconnecting the lower assembly. Moreover, the figure "644 person-rem per unit" is not contained in Table 3.3-2, SGRR, Revision 7.
2-10	3	"FPL will use some experienced personnel from the Surry Unit 2 steam generator removal and replacement."	This sentence should be changed to read: "Persons employed by FPL participated in and/or reviewed and observed the Surry Units 1 & 2 steam generator removal and replacement."
2-10	4	"All craft personnel will be required to take training in radiological protection."	This sentence should be changed to read: "All craft personnel who work in radiation controlled areas will be required to take training in radiological protection."
2-10	6	"... laboratory facilities ..."	No additional laboratory facilities are presently planned. The phrase should be eliminated.
3-2	No. 4	"The containment boundary will not be disturbed except to open the equipment hatch."	Personnel and emergency hatches will also be opened. It is recommended that the sentence be rewritten to state: "The containment boundary will not be disturbed except to open the hatches."

3-2 No. 5 "The existing polar crane trolley will be replaced by a higher capacity temporary construction hoist."

3-3 Footnote "Reduced to about 173 tons by virtue of the channel cut versus the coolant pipe cut."

3-4 1 "With regard to dropping a steam generator assembly outside of the containment building, no other safety-related structures (such as the radioactive facility and the fuel storage building) are within the range of the devices used to lift the steam generators from the equipment hatch platform to the transporter."

3-5 8 "During the construction phase of the steam generator repair program, the containment ramp will be removed and replaced by a temporary loading platform."

3-8 4 "Following removal of the lower shell, further decontamination will be made on the channel head/coolant pipe interior surfaces."

Change sentence to read: "The existing polar crane trolley will be replaced by a higher capacity temporary construction hoist, or the existing polar crane trolley may be modified and rerated to a higher capacity."

It is recommended that this statement be modified to state:

"Reduced to about 173 tons without cover plates and plugs, or 186 tons with cover plates and plugs, by virtue of the channel cut versus the coolant pipe cut."

The SGLA's will not be lifted by a crane onto a transporter, but will be slid on Hillman rollers directly onto the transporter deck. This alternate approach was previously described in the SGRR, Revision 3, Response to Question 6, pg. A-6-1 (April, 1978).

This sentence should be modified to read:

"Prior to the construction phase of the steam generator repair program, the containment ramp will be permanently modified to support future plant operations and maintenance work, as well as the steam generator repair program."

It is recommended that this sentence be changed to:

"Following removal of the lower shell, further decontamination may be done if ALARA effective on the channel head/coolant pipe nozzle interior surfaces."

3-10 3 The steam generator channel head weld material will be E7018ACC welding electrodes.

The weld specification currently out for bids allows the use of the following types of electrodes for the channel head weld:

SFA5.1, Classification E7016 or E7018

SFA5.18, Classification ER70S-2

SFA5.28, Classification ER80S-D2

SFA5.5, Classification E8018G

3-10 5 "Since there is a small possibility of a breach in the weld if dropped during a 12-foot lift ..."

Lifting of the SGLA's over the SGSC walls will require lifts in excess of 12' (possibly 22' to 25' lifts.)

3-17 5 "Therefore, if the filter, which is located at the special enclosure ..."

The HEPA filters will be located downstream from the special enclosures.

3-18 3 The steam generator lower assembly after the end plates are welded in place, will be lowered to a carrier from the level of the equipment hatch."

It is recommended that this sentence be changed to read:

"After the end plates are welded in place, the steam generator lower assembly will be slid on Hillman rollers directly onto the transporter deck at the level of the equipment hatch."

3-18 3 "The lift was assumed to take place near the laydown area, about 300 meters from the receptor location on the shoreline."

3-18 3 "Using 33.5 curies as the amount of activity released ..."

3-18 3 "... the radiological consequence of the drop accident outside containment is 15 rem."

3-19 §3.6, ¶7 "During the repair program ... [a] temporary license condition will be imposed" which requires that "Sixty days prior to fuel loading, FPL should submit for evaluation by the NRC a steam generator secondary water chemistry control and monitoring program which will address ...". certain procedures.

3-19 §3.6, ¶8(a) "A system should be set up so that the pressure in the inflatable plug seal in the RCS pipe nozzles should be monitored."

See letter from Uhrig to Varga, I-81-40, February 17, 1981, response to question 3.

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FPL believes this "temporary condition" is inappropriate. We presently have a secondary water chemistry program covered by plant procedures which is already available to NRC. Moreover, FPL believes that the Electric Power Research Institute Steam Generators Owners Group (EPRI-SGOG) Secondary Chemistry Guidelines Committee's effort to develop a technically supported secondary chemistry program for PWR steam generators is more technically rigorous than the position provided in NRC Branch Technical Position MTEB 5-3. FPL will commence discussions with NRC related to this matter.

This should be changed to read:

"A written procedure should be provided to implement a system to monitor the pressure in the inflatable plug seals in the RCS pipe nozzles."