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ACCESSION NBR:8108040319 DOC.DATE: 81/07/30 NOTARIZED: NO DOCKET #
FACIL: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: Application for amend to License DPR-41 to authorize facility operation for addl two equivalent full power months prior to performing next steam generator insp.
SEE Rqst. # 8104060572
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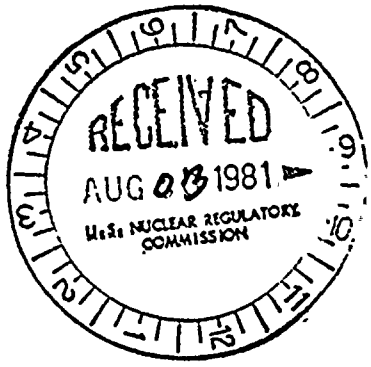
FLORIDA POWER & LIGHT COMPANY

July 30, 1981
L-81-329



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 Unit 4
Docket No. 50-251
Steam Generator Inspection

In response to our letter of May 27, 1981 (L-81-227), the Commission issued Amendment No. 62 to Facility Operating License No. DPR-41 for Turkey Point Unit 4, authorizing continued operation for eight equivalent full power months from January 13, 1981. Our May 27 letter had requested authorization to operate for ten equivalent full power months prior to performing the next steam generator inspection.

On December 18, 1980 (L-80-412), Florida Power and Light Company submitted the results of the last steam generator inspection and preventive tube plugging performed for Turkey Point Unit 4. The steam generators were last inspected in November, 1980. The NRC Staff reviewed the results and the preventative plugging and issued Amendment 54 authorizing operation for six equivalent full power months. Unit 4 was returned to service on January 13, 1981.

The steam generator inspection and preventive plugging program was developed by FPL and our NSSS vendor in 1976 and 1977. On June 9, 1977 (L-77-173), we submitted information that demonstrated the inspection and plugging program would ensure protection of public health and safety during normal operation and postulated accident conditions. The program has been used successfully at Turkey Point in the subsequent four years since June, 1977 to prevent tube leakage and assure continued safe operation.

In January, 1979, the original six month program was expanded to provide for a ten month operating interval. The expanded program consists of the original inspection and plugging criteria and includes additional plugging criteria to increase the conservatism of the six month program. The expanded program results in more tubes plugged beyond those required for a six month operating interval.

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The ten month program has been implemented in five inspections, including the current operating intervals for Units 3 and 4. The Staff approved and the units were subsequently operated for two, operating intervals of 10 months each and an 8-1/2 month interval (only 8-1/2 months were requested). Unit 3 has exerienced one forced outage since July 1978 due to steam generator tube leaks (source of leakage was leaking plugs, not a new tube leak). Unit 4 has operated since February 1978 with no forced shutdowns due to steam generator tube leaks. Unit 4 is presently operating with slight leakage in the B steam generator. This leakage has been relatively constant and significantly below the allowable .3 gpm limit (i.e., less then .01 gpm). To date the leakage behavior is consistent with past experiences with "weeping" plugs.

The inspection program is described in the last inspection report (Attachment A). The program included denting inspections in the hot and cold legs of all steam generators, flow slot measurements, small radius U-bend inspections, Regulatory Guide 1.83 inspections in the hot and cold legs of all three steam generators, and preventive plugging for ten months. In addition to normal operating conditions, the worst case accident condition, i.e. the main steam line break, was analyzed to justify continued operation in excess of ten months. The level of steam generator tube plugging, which is currently 23.8%, is conservatively bounded by the 28% ECCS analysis, recently approved by the staff.

During the Staff review of the inspection report (Attachment A), additional information was requested regarding the tube wastage in steam generator B. On February 27, 1981 (Attachment B), we submitted the requested information. With respect to tube wastage, this analysis supports a minimum operating interval in excess of 14 months.

The extensive inspections and conservative level of preventing plugging performed during the last outage, the submitted tube wastage information, analyses of postulated accident conditions, and operating restrictions provided by existing license conditions, ensure safe plant operation for a period in excess of ten months, and continue to assure protection of the public health and safety.

Due to a recent failure of the Turkey Point Unit 3 electrical generator and Commission issuance of Amendment No. 69, for Turkey Point Unit 3 on June 24, 1981, the steam generator repair program for Turkey Point Unit 3 is in progress. Unit 3 will be out of service until early 1982. This situation combined with the Unit 4 steam generator inspection outage scheduled for September, would place the reserves in southeast Florida at an unacceptably low level of 12.8%. (See Attachment C). The continued operation of Turkey Point Unit 4 would raise our southeast Florida reserves to an acceptable level.

Accordingly, we request the Unit 4 be authorized to operate for an additional two equivalent full power months prior to performing the next steam generator inspection. The inspections and preventive plugging conducted during the last inspection justify continued operation for a ten month operating interval.

Furthermore, the conservatism in the inspection and plugging program (as evidenced by past experience), the analyses presented in the attachments, and the existing license conditions assure the protection of public health and safety.

The original request for an additional four equivalent full power months of operation has been reviewed and approved by the Plant Nuclear Safety Committee and the Company Nuclear Review Board.

As this request falls within the period originally sought in the May 27, 1981 request for extended operation, wherein it was determined that a Class III fee was proper and forwarded in accordance with 10 CFR 170, no further fees are enclosed.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/DAC/ras

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

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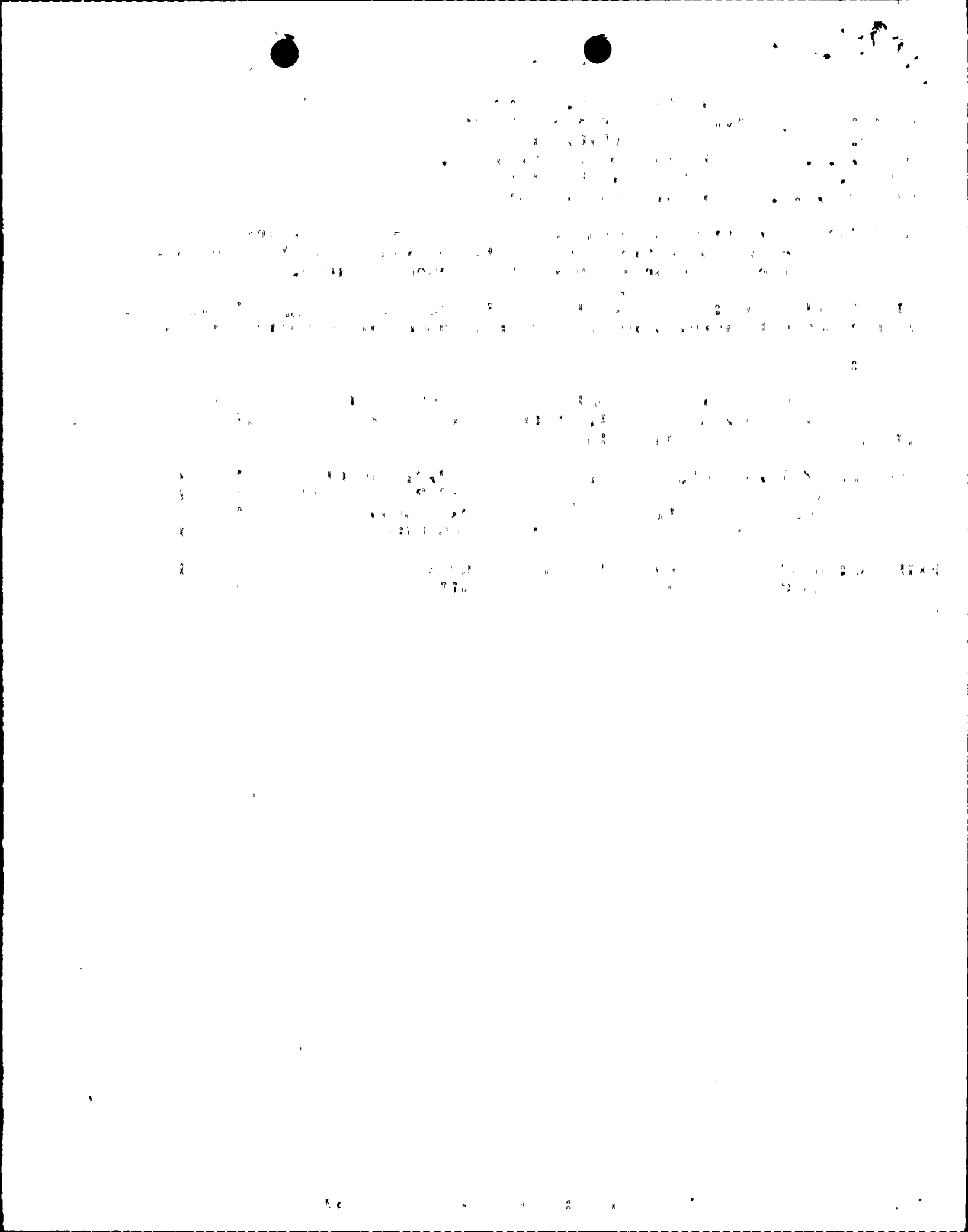

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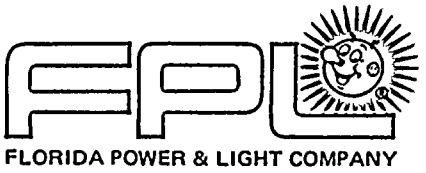

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