REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8205040622 DOC.DATE: 82/04/27 NOTARIZED: YES DOCKET #
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 Generic Ltr 82-05, "Post-TMI Requirements."

DISTRIBUTION CODE: A046S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 8
TITLE: Response to NUREG-0737/NUREG-0660 TMI Action Plan Rqmts (OL's)

NOTES:

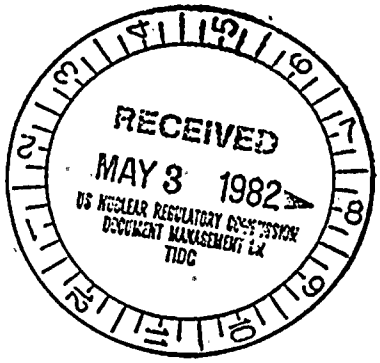
	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
	ORB #1 BC	01	7	7				
INTERNAL:	ELD		1	0	IE/DEP DIR	33	1	1
	IE/DEP EPDS		1	1	IE/DEP/EPLB		3	3
	NRR/DE DIR	21	1	1	NRR/DE/ADCSE	22	1	1
	NRR/DE/ADMQE	23	1	1	NRR/DE/ADSA	17	1	1
	NRR/DHFS DIR	28	1	1	NRR/DHFS/DEPY	29	1	1
	NRR/DL DIR	14	1	1	NRR/DL/ADL	16	1	1
	NRR/DL/ADOR	15	1	1	NRR/DL/ORAB	18	3	3
	NRR/DSI ADRS	27	1	1	NRR/DSI DIR	24	1	1
	NRR/DSI/ADPS	25	1	1	NRR/DSI/ADRP	26	1	1
	NRR/DSI/AEB		1	1	NRR/DSI/ETSB		1	1
	NRR/DSI/RAB		1	1	NRR/DST DIR	30	1	1
	NRR/DST/ADGP	31	1	1	NRR/DST/ADT	32	1	1
	REG FILE	04	1	1	RGN2		1	1
EXTERNAL:	ACRS	34	10	10	FEMA-REP DIV		1	1
	INPO,J.STARNES		1	1	LPDR	03	1	1
	NRC PDR	02	1	1	NSIC	05	1	1
	NTIS		1	1				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 53 ENCL 52

FLORIDA POWER & LIGHT COMPANY

April 27, 1982
L-82-175

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 & 4
Docket Nos. 50-250 and 50-251
Post-TMI Requirements
Generic Letter No. 82-05

This letter transmits to you our response to Generic Letter No. 82-05. All items applicable to Turkey Point Units 3 & 4 that are listed in Enclosure 1 of the generic letter have been addressed.

Very truly yours,

J. A. de Mestre
for

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PKG/mbd

Attachment

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

A046
S.1

ATTACHMENT

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Post-TMI Requirements
Generic Letter No. 82-05

1. SIMULATOR EXAMS (I.A.3.1)

Simulator exams have been included as part of the licensing examinations for senior reactor operators and reactor operators. This has been in effect prior to the required date of October 1, 1981. A tentative examination schedule was sent to Mr. Paul F. Collins in letter L-81-446 dated October 13, 1981 as a response to Generic Letter No. 81-29.

2. PLANT SHIELDING (II.B.2)

The schedule we provided you in letter L-82-5 dated January 7, 1982 is revised such that all modifications will be completed by June 4, 1982 with the following exceptions shown below that were previously identified. The replacement of air operated valves CV-2819 and CV-2826 at Unit 3 with qualified valves will be completed during the next available outage of sufficient duration following receipt of the valves. The same situation exists at Unit 4 but the valve change out will occur prior to startup from the Unit 4 steam generator repair outage.

(a) JUSTIFICATION OF PROPOSED SCHEDULE

All of the items needed for implementation had promised delivery dates no later than November 1981. The actual or currently promised delivery dates are listed below:

Radiation shielding doors - Received March 25, 1982

Reach rods - Partially received - February 27, 1982 and March 18, 1982
Final shipment received March 29, 1982

Air operated valves - Promised ship date August 31, 1982

Plug Valve - Received April 5, 1982

Lead Bricks - Promised ship date April 13, 1982

Control panel (for doors) - Promised ship date April 7, 1982

(b) Demonstration of need for proposed schedule

With the late delivery of equipment shown in (a) above, there is approximately two months worth of construction effort required to complete this item.

(c) Description of Compensatory Measures Being Taken in the Interim

The modifications are being completed as rapidly as possible.

3. POST ACCIDENT SAMPLING CAPABILITY (II.B.3)

In our letter L-82-5 dated January 7, 1982 we stated that it was our intent to have the Post-accident Sampling System installed and operable prior to the Turkey Point Unit 3 startup from its steam generator repair outage which has just recently ended. It is our intent (based on the justification provided below) to have the system installed by June 4, 1982 with startup testing scheduled for completion on July 2, 1982 with the following exception which we have previously identified to you. The replacement of the existing Unit 4 automatic sample valves will be completed at the next scheduled outage of sufficient duration. This does not effect the operability of the system, only the qualification for performing in the post accident environment.

(a) Justification of proposed schedule

A strike by Milton Roy Corp., a subvendor to Applied Physics Technology, was the major delay in finalizing vendor drawings to our Architect-Engineer (Bechtel Power Corp.). This delayed the final engineering of the system within the proposed room. Specifically affected were final layout, shielding design, and the ordering of cable trays.

The following items are presently on order:

Cable Trays - Promised ship date April 30, 1982

Lead Bricks - Promised ship date April 13, 1982

Steel Plate - Promised ship date April 12, 1982

Microprocessor for Chloride analysis - on indefinite hold.
NOTE: Manufacturer (Orion) has operability problems.

Grab Samplers - Promised ship date May 15, 1982

(b) Demonstration for Need for Proposed Schedule

With the late delivery of equipment shown in (a) above, there is approximately two months worth of construction effort required to complete this item.

(c) Description of Compensatory Measures Being Taken in the Interim

In letter L-80-16 dated January 11, 1980 we briefly discussed that appropriate plant procedures had been revised to describe methods which could be used to obtain RCS samples after an accident using existing facilities. The NRC "Evaluation of Compliance with Category "A" Lessons Learned Requirements" for Turkey Point 3 & 4 dated April 7, 1980 found that Turkey Point was in compliance with the lessons learned requirements for post-accident sampling.

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

The training program we discussed in letter L-81-183, dated April 28, 1981 was completed as required prior to October 1, 1981. We previously informed you of this status in our letter L-82-5 dated January 7, 1982.

5. AUXILIARY FEEDWATER SYSTEM AUTOMATIC INITIATION AND FLOW INDICATION (II.E.1.2)

A. AUTOMATIC INITIATION OF AFW

The as-built system is safety grade. We had previously identified to you that the actuation of the pressure regulating valves for steam supply to the AFW pump turbines is not designed in accordance with single failure criteria. These valves are scheduled to be removed at the same time the long term modifications (new turbines, redundant piping) are installed during the Unit 4 steam generator repair outage.

B. AFW FLOW INDICATION

The modifications for safety grade, redundant, AFW flow indication have been completed for both Turkey Point Units 3 and 4. As we stated in letter L-82-5, dated January 7, 1982, the power supplies for the flow indication and flow control were not environmentally or seismically qualified. Modifications to the qualified power supplies have been installed in Unit 3 and will be installed in Unit 4 during the next scheduled outage of sufficient duration. These modifications are themselves in the process of being qualified at the present time.

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

PART 5

A Safety Evaluation Report enclosed in a letter from S.A. Varga to R.E. Uhrig dated August 31, 1981 concluded that the requirement of Item II.E.4.2(5) of NUREG-0737, with additional guidelines developed by the staff, have been met for the Turkey Point Units. We told you in letter L-82-5 dated January 7, 1982 that we considered this item closed with no modifications necessary.

PART 7

The containment purge and vent valves close upon receipt of a containment high radiation signal. This fact was submitted to you in letter L-80-39 dated January 31, 1980.

7. NOBLE GAS MONITORS/IODINE, PARTICULATE SAMPLING (II.F.1.1 AND II.F.1.2)

As we stated in our letter L-82-93 dated March 15, 1982, all five of the effluent monitors are completely installed and operable. Each has been tested and calibrated. Installation was completed on January 1, 1982 and calibration completed on March 5, 1982. It is our intent to have operating procedures written by May 17, 1982. As previously stated in our letter L-82-5 dated January 7, 1982, the plant vent effluent monitor may require additional modifications to provide isokinetic sampling. Any needed modifications will be scheduled when the extent of the modifications, if any are known.

8. CONTAINMENT HIGH RANGE RADIATION MONITOR (II.F.1.3)

The redundant containment high range radiation monitors were installed in Turkey Point Unit 4 on December 18, 1981 with startup testing completed and the system operable by January 17, 1982. In situ calibration of both channels by means of a calibrated radiation source will be completed during the next scheduled outage of sufficient duration. In situ calibration by electronic signal substitution was made for the high ranges of this monitor.

The redundant monitors for Unit 3 were completed by March 15, 1982. Calibration of the monitors in accordance with the requirement of NUREG-0737 Item II.F.1.3 have been completed for Unit 3.

(a) Justification of Proposed Schedule

The additional calibration of the Unit 4 monitors requires containment entry. For health physics reasons, the high range source calibration of both channels are best performed during a plant outage.

(b) Demonstration of Need for Proposed Schedule

See (a) above.

(c) Description of Compensatory measures being taken in the Interim

The Unit 4 monitors have already been calibrated at the high range with the electronic signal substitution. When the calibration using the calibrated radiation source at Unit 3 was compared to the calibration using electronic signal substitution (at lower range), there was good agreement between the two. The same correlation should hold for Unit 4.

9. CONTAINMENT PRESSURE MONITOR (II.F.1.4)

The high pressure portion of the system for both Turkey Point Units 3 and 4 were operational by March 25, 1982. The vacuum range portion is scheduled to be completed by June 30, 1982.

(a) Justification of Proposed Schedule

The vacuum range transmitters were originally added to a Westinghouse purchase order. Many months later, Westinghouse informed FPL that they could not supply the transmitters. FPL then went to Rosemount and received a commitment for transmitters. This delivery date is presently scheduled for May 24, 1982. Installation, calibration, and startup loop testing should be completed by June 30, 1982.

(b) Demonstration of need for proposed schedule

The completion date is based on vendor delivery. If the delivery is improved or slipped, implementation will move accordingly.

(c) Description of Compensatory measures being taken in the interim

The high pressure portion of the system which is installed is the most useful part of the system in a potential accident situation. Compensatory measures are not necessary for the vacuum portion.

10. CONTAINMENT WATER LEVEL MONITOR (II.F.1.5)

The redundant containment water level monitors were installed and operational in Turkey Point Unit 4 by January 1, 1982. Both trains of the Unit 3 monitors were completed as of March 27, 1982.

11. CONTAINMENT HYDROGEN MONITORS (II.F.1.6)

It is scheduled that installation be complete by June 4, 1982 with the exception of heat tracing (including controllers and transformers) for the sample line from the containment to the H_2 monitors. The scheduled shipping date from the vendor is June 30, 1982. We expect to have the heat tracing installed by August 16, 1982. Startup testing and calibration is scheduled for completion by July 2, 1982. It should be noted that the absence of heat tracing will affect the accuracy of the monitors during certain accident conditions.

(a) Justification for proposed schedule

The "A" Train monitors will be physically located in the same room as the Post Accident Sampling System. Thus, the delays described under "Justification" in II.B.3 are common to this item. The "B" Train monitors are presently installed (except for heat tracing) and turnover from construction is in progress.

(b) Demonstration of need for proposed schedule

Same reasons as described under Item II.B.3.

(c) Description of Compensatory Measures being Taken in Interim

The necessary sampling and analysis of containment atmosphere hydrogen concentration can be performed using existing nuclear chemistry procedures, NC-53, "Sampling and Analysis of Containment Atmosphere for Preparation and Documentation of Instrument Bleedline and Containment Purge Releases" and NC-94, "Determination of Percent Gas Concentrations (Chromomapography)".

12. TECHNICAL SPECIFICATIONS

NUREG-0737 identifies the following items that are applicable to Turkey Point Units 3 & 4 addressed in enclosure 1 of Generic Letter No. 82-05 as requiring the submittal of technical specifications: II.B.3, II.E.1.2, II.E.4.2(7) and II.F.1.1 through II.F.1.6.

In letter L-82-93 dated March 15, 1982, we stated that it is our intent to submit all of the required Item II.F.1 technical specifications in a single submittal following the complete installation and determination of OPERABILITY of all the monitors. It is still our opinion that a single technical specification submittal of all item II.F.1 monitors will be more efficient and will eliminate repetitive reviews by both your staff and ours. It is also our intent to submit any required technical specifications for item II.B.3 at that time. We are currently reviewing items II.E.1.2 and II.E.4.2(7) to determine what technical specifications if any are appropriate.

13. NON-APPLICABLE ITEMS

The following NUREG-0737 items identified in Generic Letter 82-05 are applicable to either B&W plants or BWR's and are not applicable to Turkey Point Units 3 & 4.

II.K.2.10, II.K.3.15, II.K.3.19, II.K.3.22, II.K.3.24, II.K.3.27

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

J. A. DeMastry, being first duly sworn, deposes and says:

That he is Manager, Nuclear Licensing of Florida Power & Light Company, the herein;

That he has executed the foregoing document; that the statements 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

J. A. DeMastry

J. A. DeMastry

Subscribed and sworn to before me this

27 day of April, 1983

Cheryl Z. Fredrick

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 October 30, 1983 Bonded thru Maynard Bonding Agency