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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
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UHRIG,R.E. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to 820701 request for submittal addressing functionability of pressurizer safety valves & power operated relief valves,required by NUREG-0737,Item II.D.1.A. Final safety valve evaluation will be sent by 820901.

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FLORIDA POWER & LIGHT COMPANY

July 9, 1982
L-82-275

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 No. 50-250 and 50-251
Post-TMI Requirements
NUREG-0737 Item II.D.1
PWR Relief and Safety Valve Testing

The purpose of this letter is to provide the Florida Power & Light response to the July 1, 1982, NRC request for a submittal that addresses the functionability of the pressurizer safety valves and power operated relief valves (PORV's) that are installed in the Turkey Point Units 3 & 4 systems. Item II.D.1.A of NUREG-0737 required that utilities operating and/or constructing Pressurized Water Reactor (PWR) power plants provide evidence, supported by test, of safety and relief valve functionability. In response to these requirements, the Electric Power Research Institute (EPRI) implemented a generic test program on behalf of the PWR utilites. Florida Power & Light has been a participant in the EPRI program. The NRC Generic Letter 81-36 dated September 19, 1981, contains a schedule for the submittal of test results and the submittal of plant-specific reports. In accordance with this schedule, results of the EPRI program, summarized in various EPRI reports, were forwarded to the NRC on April 1, 1982, in parallel with distribution to the participating utilities. Florida Power & Light Company referenced this submittal as applicable to Turkey Point Units 3 & 4 in our letter L-82-127, also dated April 1, 1982. The following is Florida Power & Light's evaluation of the functionability of the pressurizer safety valves and power operated relief valves (PORV's):

Power Operated Relief Valve (PORV)

The PORV's at Turkey Point Units 3 & 4 utilize a 2 inch Copes Vulcan valve with a 17-4PH Plug and Cage. Two Copes Vulcan Valves were selected by the manufacturer for the EPRI Test Program. Both models that were tested were a 3 inch Glove Type D-100-160 with a 17-4PH Plug and Cage and a 316 with Stellite Plug and 17-4PH Cage. Reference (1) provided the justification that these valves are representative of the PORVs at Turkey Point Units 3 & 4.

A046

Re: Turkey Point Units 3 & 4
Docket No. 50-250 and 50-251
PWR Safety and Relief Valve Test Program

The EPRI tests that were performed represent the plant specific PORV operating conditions during both the high and low pressure setpoint modes of operation. The test conditions were selected based on the fluid conditions presented in Reference (2).

The "As Tested" test matrices and the valve performance data for the Turkey Point Unit 3 & 4 PORVs is shown in Reference (3) section 4.7. In the valve tests performed at Marshall Steam Station, the valve fully opened on demand for each of the eleven evaluation test cycles. An additional 43 cycles were performed with satisfactory operation. Some of these tests were performed under dry conditions. During the next 5 tests the valve did not fully close on demand. Since the 48 cycles were out of scope tests and operated the valve under dry conditions, which it would not see at Turkey Point units 3 & 4, these tests should not be considered as demonstrating valve operability. In all of the Marshall and Wyle evaluation test cycles the valve fully opened and closed on demand.

Safety Valve

The evaluation of the Turkey Point Unit 3 & 4 safety valves is still in progress. The safety valve operability evaluation is affected by the results of the discharge piping reanalysis being performed by Ebasco Services Inc. When the piping reanalysis is completed the safety valve evaluation will be finalized. The final submittal for safety operability will be transmitted by September 1, 1982. This is the same schedule we provided you in our April 1, 1982 letter.

References:

1. "PWR Safety and Relief Valve Test Program Selection/Justification Report", NP-2292-LD, Research Project V102, prepared by MPR Associates, Inc., Participating PWR Safety and Relief Valve Manufacturers; EPRI PWR Safety and Relief Valve Test Program Staff, March 1982.
2. Valve Inlet Fluid Conditions for Pressurizer Safety and Relief Valves in Westinghouse - Designed Plants, NP-2296-LD Project V102-20 prepared by Westinghouse Electric Company, March 1982.
3. "EPRI PWR Safety and Relief Valve Test Program - Safety and Relief Valve Test Report", prepared by EPRI Valve Test Program Staff, April 1982.

Very truly yours,

Jack E. Vassey for

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PKG/JDR/mbd

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