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NOVAK, T. M. Division of Pressurized Water Reactor Licensing - A (post 8

SUBJECT: Confirms recent discussions re limiting condition for oepration (LCO) of emergency diesel generators. Interim administrative controls implementing 7-day LCO in Modes 1,2, 3 & 4 established as suppl to Tech Spec 3.7.2.b.

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Office of Nuclear Reactor Regulation
Attention: Mr. Thomas M. Novak, Acting Director
Division of Pressurized Water Reactor Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Novak:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Emergency Diesel Generator Technical Specifications

This will confirm our recent discussions with you and your staff regarding the limiting condition for operation (LCO) applicable to the operation of the emergency diesel generators at the Turkey Point plant. The NRC has requested, pending submittal and approval of revised technical specifications for Turkey Point in accordance with our Performance Enhancement Program (Project 10), that an LCO of fixed duration be established by administrative control. The current Turkey Point Plant Technical Specification 3.7.2.b provides for notification to the NRC if a diesel generator outage is to be seven (7) days or more, but does not require a unit shutdown.

Accordingly, FPL has established interim administrative controls implementing a seven (7) day LCO in modes 1, 2, 3 and 4 for the Turkey Point plant emergency diesel generators in addition to the current Technical Specification 3.7.2.b requirement for notification. It is understood that exceeding this administrative LCO would necessitate placing both units in cold shutdown. This would not preclude a request for emergency or exigent relief, if conditions warrant.

The basis for our interim LCO is attached.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

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JKH1/028/1

BASIS FOR SEVEN (7) DAY EMERGENCY DIESEL GENERATOR LCO

Turkey Point Technical Specification 3.7.2.b, applicable during power operation or restarting from hot shutdown, currently requires the following:

> "Power operation may continue if one diesel generator is out of service provided (1) the remaining diesel generator is tested daily and its associated engineered features are operable, and (2) either start-up transformer is operable. If the diesel outage is to be seven (7) days or more the NRC shall be notified."

FPL, as requested by the NRC, has established interim administrative controls for Turkey Point Units 3 and 4 which require that both units be shutdown if an inoperable diesel generator cannot be restored to an operable status within seven (7) days. These interim controls are appropriate for Turkey Point based on the following:

(1) A seven day LCO is required (based on a review of the Turkey Point diesel generator maintenance history) to allow adequate time to perform the manufacturer's recommended preventive maintenance, and to perform troubleshooting and/or repairs before a shutdown of both units is required. The example of performance based technical specifications included in Generic letter 84-15, Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability, states that "the maximum time that an individual diesel may be inoperable shall be established by the licensee based on the manufacturer's recommendations and previous maintenance and repair experience."

(2) The interim LCO is consistent with the current technical specification in that action is required within 7 days (now unit shutdown(s) and NRC notification in accordance with the current technical specification vs. NRC notification only).

(3) A number of other operating plants have 7 day LCO's for their diesel generators.

(4) In the unlikely event both safety grade diesels become inoperable either the A or B bus can be powered via the C bus from the non-safety-grade black start diesels. There are five black start diesels installed at the Turkey Point Plant. These black start diesels are the same basic engine size as the safety grade diesels.