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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
AUTH. NAME AUTHOR AFFILIATION
WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
RUBENSTEIN, L. S. PWR Project Directorate 2

SUBJECT: Informs that WCAP-11145 will be ref to satisfy NUREG-0737, TMI Action Item II.K.3.31 in plant-specific small-break LOCA analysis.

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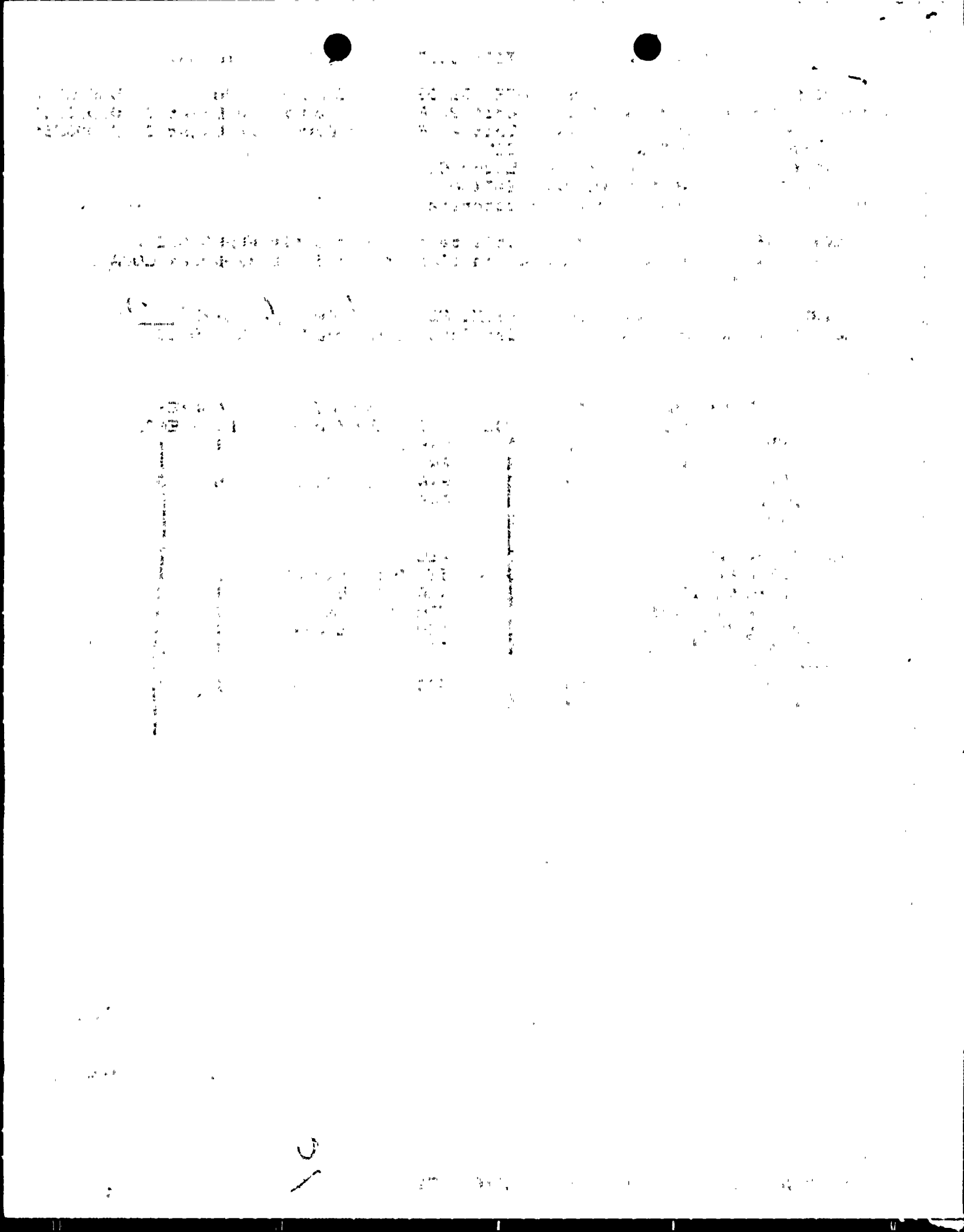

O. BOX 14000, JUNO BEACH, FL 33408

FLORIDA POWER & LIGHT COMPANY

AUG 27 1986

L-86-340

Office of Nuclear Reactor Regulation
Attention: Mr. Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Rubenstein:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NUREG-0737, Item II.K.3.31
Small Break LOCA Model
NRC TAC Nos. 48210 and 48211

NUREG-0737 Item II.K.3.31 requires all licensees to submit plant-specific small-break loss-of-coolant accident (SBLOCA) analyses using evaluation models revised per Item II.K.3.30. In Generic Letter No. 83-35, "Clarification of TMI Action Plan Item II.K.3.31", the NRC Staff indicated that the resolution of Item II.K.3.31 may be accomplished by generic analyses to demonstrate that the previous NRC approved WFLASH SBLOCA Evaluation Model results were conservative when compared with the new NOTRUMP SBLOCA Evaluation Model. As indicated in FPL letter L-85-292 dated July 31, 1985, such generic studies were undertaken by the Westinghouse Owners Group (WOG) of which Florida Power & Light Company is a participating member. The WOG has completed these generic studies and has submitted the results of the analyses to the NRC in the topical report WCAP-11145 (L. D. Butterfield letter to J. Lyons, "Westinghouse Owners Group Transmittal of WCAP-11145, OG-190, dated June 11, 1986.) The purpose of this letter is to inform you that FPL is referencing topical report WCAP-11145 in order to satisfy the requirements of TMI Action Item II.K.3.31 for the Turkey Point Plant.

Topical report WCAP-11145 documents the results of a series of SBLOCA analyses performed with the NRC approved NOTRUMP SBLOCA Evaluation Model. Cold leg break spectrum analyses were performed for the limiting SBLOCA plant from each of the Westinghouse 4-loop, 4-loop Upper Head Injection (UHI), 3-loop, and 2-loop plant categories. The limiting SBLOCA plant in each category was defined on the basis of previous SBLOCA analyses which were performed with the NRC approved WFLASH SBLOCA Evaluation Model. In addition to the cold leg break spectrums, a hot leg and pump suction break were performed as part of the 4-loop plant analyses, confirming that the cold leg was still the worst break location. Comparison of the NOTRUMP cold leg break spectrum results with the previously generated WFLASH results, showed that the WFLASH results were conservative for all plant categories. In particular, the 3-loop plant category results showed

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that the NOTRUMP SBLOCA Evaluation Model calculated a limiting Peak Clad Temperature (PCT) which was 586 °F lower than that previously calculated by the the WFLASH SBLOCA Evaluation Model.

The generic results documented in WCAP-11145, demonstrate that a plant specific reanalysis of the 3-loop Turkey Point plant with the NOTRUMP SBLOCA Evaluation Model would result in the calculation of a limiting PCT which would be significantly lower than the 1605 °F PCT currently calculated with the WFLASH SBLOCA Evaluation Model. Hence, the WFLASH SBLOCA Evaluation Model results which currently form the licensing basis for the Turkey Point Plant are conservative and still valid for demonstrating the adequacy of the Emergency Core Cooling System to mitigate the consequences of a SBLOCA, as required by 10 CFR 50.46. Therefore, a plant specific analysis is not needed in order for the Turkey Point Plant to comply with TMI Action Item II.K.3.31.

If there are any questions, please call us.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/cvb

cc: Dr. J. Nelson Grace, USNRC, Region II
Harold F. Reis, Esquire, Newman & Holtzinger