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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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RECIP. NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Submits info to more accurately define functional requirements for safety-related 125-volt dc power trains at facilities during current dual-unit outage. Configuration meets requirements of 10CFR50.59.

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket No. 50-250 and 50-251
Operable DC Busses During the
Emergency Power System Enhancement Outage

The purpose of this letter is to more accurately define the functional requirements for the Safety Related 125 Volt DC power trains at Turkey Point during the current dual unit outage.

On July 17, 1990, Florida Power & Light Company (FPL) met with the NRC to discuss the planning and status of the Emergency Power System enhancements dual unit outage at the Turkey Point Plant. At this meeting, among other topics, FPL discussed the 10 CFR 50.59 review of the plant configuration during the outage. Subsequently, FPL submitted letter L-90-352 which provided the following:

1. A list of the Technical Specifications that will be in effect while both reactor cores are defueled;
2. A list of equipment that will be functional while both cores are unloaded and all emergency diesel generators are out of service, and
3. A description of the Configuration Control Program that will be in effect during the outage.

The above letter identified the functional requirements for the Safety Related 125 Volt DC power trains as "1 out of 2 functional per unit." This is beyond the requirements of the 10 CFR 50.59 configuration review, which states that

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"there will be periods during the dual-unit outage when these lineups will change due to construction and maintenance activities requiring, for example, load centers and/or distribution panels to be deenergized. During these periods, alternative lineups may provide power distribution needs..."

This review also states that

"connection of safety related busses together or the use of temporary connections is acceptable as long as precautions are taken to return the system to its design configuration prior to declaring operability of the emergency power system."

At Turkey Point, the 125 Volt DC system consists of 4 busses, which are functionally not unit specific. Modifications to the batteries and busses are being performed. The modifications to the 4A bus are complete, and modifications to the 3B and 4B busses are in progress. Upon completion of the modifications to the 4B bus, work will be performed on the 3A bus. During this modification work, the 3B bus will be non-functional; however, both unit 4 busses will be functional during this time. Control power to required equipment, which is normally powered from either the 3A or 3B busses, will be provided from functional busses using the approved plant procedures for Temporary System Alterations.

The configuration described above meets the requirements of the approved 10 CFR 50.59. Configurations equivalent to the above (any 2 out of 4 functional vs. 1 out of 2 functional per unit) will be considered as the minimum equipment functionality requirement for Safety Related Trains of 125 Volt DC power while both cores are unloaded and all emergency diesel generators are out of service.

Should there be any questions, please contact us.

Very truly yours,



T. F. Plunkett
Vice President
Turkey Point - Nuclear

TFP/GS

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant