

# REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-000 Generic Docket 05000000  
 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co 05000251  
 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co, 05000335  
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co, 05000389

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 UHRIG, R.E. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

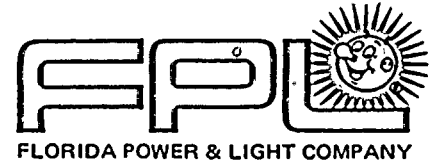
SUBJECT: Comments on generic steam generator requirements, per 830706 meeting. New requirements would overburden utilities w/excessive insp costs, man rem exposure & unit unavailability while providing minimal improvements in safety.

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## NOTES:

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|           | REG FILE                  | 04                 |  | RGN2                      | 1                  |
| EXTERNAL: | ACRS                      | 16                 |  | LPDR                      | 03                 |
|           | NRC PDR                   | 02                 |  | NSIC                      | 05                 |
|           | NTIS                      | 1                  |  |                           |                    |





August 10, 1983  
L-83-443

Dr. Harold R. Denton  
Director, Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Dr. Denton:

Re: Turkey Point Units 3 & 4  
St. Lucie Units 1 & 2  
Docket Nos. 50-250, 50-251, 50-335, 50-389  
Generic Steam Generator Requirements

Florida Power & Light was represented at the NRC meeting in Bethesda on July 6, 1983 concerning the NRC staff's positions on generic steam generator requirements. The purpose of this letter is to provide comments for NRC consideration prior to final resolution and issuance of a generic requirements document.

We concur that the requirements presented by the staff are prudent and reasonable with the exception of two items as follows:

Supplemental Tube Inspections

It is our opinion that the new requirements in this area would significantly overburden utilities with excessive inspection costs, man-rem exposure and unit unavailability while providing minimal improvements in safety.

The economic conclusions discussed in the value impact analysis appear to be low in unrealistically projected implementation costs and expected man-rem exposure, furthermore, the impact study does not appear to consider the overriding effect of replacement power costs due to additional outage time.

We are also of the opinion that this requirement is not justified by a significant improvement in safety. It is our judgment that these additional inspections would not have prevented the steam generator tube leakage occurrences at our sites, nor would they have prevented or mitigated the tube rupture events which have occurred at other sites.

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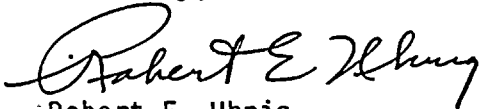


Requirement for a Condenser Inservice Program

This requirement would be redundant to the requirement for a secondary water chemistry program. The requirements of the chemistry program (which we support) provide sufficient incentive for appropriate condenser inspections and maintenance. The utilities are very knowledgeable in this area and the implementation of a required program could have the adverse effect of hindering the best technical approach to solving unique condenser problems as they occur at each site. Commitment to a secondary chemistry program would guarantee a "best effort" approach to condenser maintenance and related efforts to ensure, tube integrity.

We would welcome the opportunity to have additional discussions on this matter.

Sincerely,



Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/PLP/js

cc: Victor Stello, Jr., Deputy Executive Director  
for Regional Operations & Generic Requirements  
Darrell G. Eisenhut, Director, Division of Licensing NRR  
James P. O'Reilly, Regional Administrator, Region II  
Harold Reis, Esquire  
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