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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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 W. J. AMES, J. W. Florida Power & Light Co.  
 IP. NAME RECIPIENT AFFILIATION  
 EISENHUT, D. G. Division of Licensing

SUBJECT: Forwards response to Generic Ltr 83-28, "Required Actions  
 Based on Generic Implications of Salem ATWS Events

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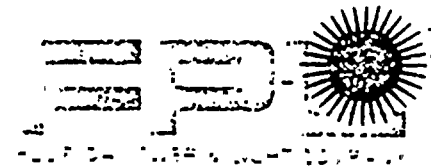
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November 8, 1983

L-83-555

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 and 4  
Docket Nos. 50-250 and 50-251  
Generic Letter 83-28

Florida Power & Light has reviewed Generic Letter 83-28 (Required Actions Based on Generic Implications of Salem ATWS Events) and a response is attached.

Should you or your staff have any questions on the attached information, please contact us.

Very truly yours,

J. W. Williams, Jr.  
Vice President  
Nuclear Energy Department

JWW/PLP/js

Attachment

cc: Mr. James P. O'Reilly, Region II  
Harold F. Reis, Esquire  
PNS-LI-83-697

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FOR ADOCK 05000250  
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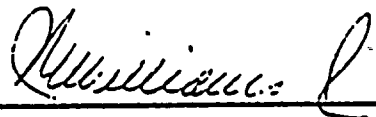


STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     ss.

J. W. Williams, Jr., being first duly sworn, deposes and says:

That he is Vice President of Florida Power & Light Company, the licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

  
\_\_\_\_\_  
J. W. Williams, Jr.

Subscribed and sworn to before me this

       day of                     , 1983.

\_\_\_\_\_  
NOTARY PUBLIC, in and for the County  
of Dade, State of Florida.

My commission expires: \_\_\_\_\_

NOTARY PUBLIC STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES DEC 3 1984  
BONDED THRU GENERAL INS. UNDERWRITERS



REQUIRED ACTIONS BASED ON GENERIC IMPLICATIONS OF SALEM ATWS EVENTS

1.1 POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE)

1. The criteria for determining the acceptability of restart.

Response:

Per ONOP 0208.1 step 3.2.4 and 5.3.1, a post-trip review is initiated to determine that the nature of the trip is conducted and documented.

Appendix A of ONOP 0208.1 requires a determination of the following:

- a) Logic that directly resulted in the reactor trip
- b) Root cause of trip
- c) Trip sequence time intervals, if available, on the following equipment:

- 1) logic matrix
- 2) RT relays
- 3) RT breakers open
- 4) RPI rod bottom
- 5) turbine stop valves closed
- 6) generator breakers open

If the digital data process system is out of service, the status of the above equipment is logged.

- d) Any LCOs
- e) A qualitative determination of the transient response of systems and equipment
- f) An equipment walkdown, if deemed appropriate
- g) Verification that unit is stable and in a desired controlled condition by observing:
  - 1) NIS
  - 2) RCS fluid inventory
  - 3) RCS pressure and temperature
  - 4) RCS flow
  - 5) Containment Conditions
  - 6) PRMS and ARMS
  - 7) Steam generator level and pressure
  - 8) Turbine generator condition
  - 9) Secondary systems
  - 10) SI Initiated: Procedure E-0 implemented



- h) A discussion of the trip cause, safety considerations, and immediate corrective actions:
  - 1) If the cause is known, acceptably corrected, and any safety considerations resolved, with the concurrence of the Operations Supervisor, Shift Supervisor, and STA, unit start-up may be authorized per OP 0202.2.
  - 2) If the cause of trip is not known or any safety considerations are not resolved, the Operations Superintendent, Plant Manager, or Site Manager shall also be contacted and concur prior to authorizing unit start-up. Any additional support, including Plant Nuclear Safety Committee review, shall be provided at this time.
- i) Appropriate notifications are made.







2. The responsibilities and authorities of personnel who will perform the review and analysis of these events.

Response:

Per procedure AP 103.2:

The Plant Supervisor-Nuclear (Shift Supervisor) is responsible for planning, scheduling, coordinating, and supervising all operations while on shift. He shall direct the activities of all operators and be aware of any activity which could affect the safe operation of the unit. He has the authority and obligation to shut-down one or both units or direct any other action necessary to ensure the units are in a safe condition. He shall direct shift operators to report all significant plant changes, problems and/or unsafe conditions to him immediately.

He shall ensure that the cause and circumstances of a trip or unintentional power reduction are determined and analyzed and shall determine that power can safely be changed before directing the return of the reactor to power after a trip or unplanned power reduction.

The Nuclear Watch Engineer shall ensure that the causes and circumstances of a trip or unintentional power reduction are determined and analyzed and shall determine that power can safely be changed before directing the return of the reactor to power after a trip or power reduction.

Per procedure AP 103.16:

The responsibilities of the Shift Technical Advisor include performance of the accident assessment and operating experience assessment functions by providing diagnostic support to Operations personnel during off-normal events and by advising the Shift Supervisor on actions to terminate or mitigate the consequences of such events. The STA serves in an advisory capacity only.

The STA should immediately assess all reactor trips and transients on his shift with regard to safety. This assessment is to include:

- 1) Sequence of events
- 2) Causes
- 3) Plant response
- 4) Corrective action taken to ensure plant safety
- 5) Violations of Technical Specifications and/or safety limits
- 6) Procedural inadequacies/equipment out of service







3. The necessary qualifications and training for the responsible personnel.

Response:

Plant Manager -

Meets ANSI 18.1 1971 standards. He shall have acquired the experience and training normally required for examination by the NRC for an SRO at Turkey Point, whether or not the exam is taken.

Operations Superintendent -

Meets ANSI 18.1 1971 standards. He shall hold an SRO license on PTP 3 and 4.

Operations Supervisor or Shift Supervisor -

Meets ANSI 18.1 1971 standards. He shall hold a current SRO license on PTP 3 and 4.

Nuclear Watch Engineer -

Meets ANSI 18.1 1971 standards. He shall hold a current SRO license on PTP 3 and 4.

Shift Technical Advisor -

He shall hold a bachelors degree or equivalent in a scientific or engineering discipline. He shall be trained in the response and analysis of the plant for transients and accidents. He shall be trained in the details of the design, function, arrangement, and operations of plant systems, including the capabilities of instrumentation and controls in the control room.







4. The sources of plant information necessary to conduct the review and analysis. The sources of information should include the measures and equipment that provide the necessary detail and type of information to reconstruct the event accurately and in sufficient detail for proper understanding.

Response:

Attached is a write-up and listing of the Digital Data Processing System used for sequence of events and post trip review.

In addition, recording charts available include: feedwater and steam flow, steam generator level, average RCS temperature, wide range  $T_{hot}$  and  $T_{cold}$ , pressurizer level and pressure, process radiation monitor, containment sump, overpower and overtemperature delta T, conductivity, rod insertion limit, generation, machine voltage, turbine vibration, secondary temperatures.







5. The methods and criteria for comparing the event information with known or expected plant behavior (e.g., that safety-related equipment operates as required by the Technical Specifications or other performance specifications related to the safety function).

Response:

Plant procedure AP 0300, Hot License Operator Training Program, provides the following overview of operator training:

Plant Systems:

System training provides a knowledge of the following concepts:

- Design bases

- System interrelationships

- Automatic functions

- Alternate modes of operation

- Failure modes

- Related Technical Specifications

- Normal, off-normal, and emergency operating procedures

Mitigating Core Damage and transient analysis provides the following operator training:

- Integrated plant response to start-ups, shutdowns, up power transients, down power transients, runbacks, trips, rod drops, load rejection, BOL and EOL considerations.

In addition, the operator is trained in accident analysis to include but not limited to LOCAs, steam line break, SGTR, ATWS, fault trees and critical safety functions.

Simulator training is provided to familiarize the operator with plant response in the following areas (not inclusive of all items):

- Reactor trips

- Runbacks

- T-G trips

- Boron/dilution malfunctions

- Dropped rods

- Loss of all feedwater

- Main steam line breaks

- SGTR

- Anticipated transients without scram

- Multiple failures

In addition to the above training, both classroom and simulator, in expected plant response and actions to take if plant response is not as expected, ONOP 0208.1 instructs the operator to be aware of 5 main parameters to ascertain if plant is in a controlled or expected condition: 1) verify reactor trip breakers







are open, 2) RCS average coolant temperature is maintained at no load conditions, 3) pressurizer pressure is stabilizing, 4) pressurizer level is stabilizing at no load value, and 5) a heat sink is available.

If these conditions are not met, instructions are provided for alternate actions. If the trip was caused by a SI signal, the operator uses his emergency procedures which provides a listing of the expected status of all safety related equipment.

6. The criteria for determining the need for independent assessment of an event (e.g., a case in which the cause of the event cannot be positively identified, a competent group such as the Plant Operations Review Committee, will be consulted prior to authorizing restart) and guidelines on the preservation of physical evidence (both hardware and software) to support independent analysis of the event.

Response:

Covered under the response to item 1.1.1. (Section h).

7. Items 1 through 6 above are considered to be the basis for the establishment of a systematic method to assess unscheduled reactor shutdowns. The systematic safety assessment procedures compiled from the above items, which are to be used in conducting the evaluation, should be in the report.

Response:

Attached are Off-Normal Operating Procedure 0208.1, Shutdown Resulting from Reactor Trip or Turbine Trip, and Administrative Procedure 0103.16, Duties and Responsibilities of the Shift Technical Advisor.



