

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8405090058 DOC. DATE: 84/05/03 NOTARIZED: YES DOCKET #  
 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  
 AUTH. NAME AUTHOR AFFILIATION  
 WILLIAMS, J.W. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards proprietary Rev 3 to "Fracture Mechanics Analysis of Turkey Point Nuclear Plant, Unit 4 Beltline Weld," per 831101 commitment. Affidavit for withholding rept encl. Rept withheld (ref. 10CFR2.790).

*Rel proprietary rept*  
 DISTRIBUTION CODE: PA015 COPIES RECEIVED: LTR 1 ENCL 3 SIZE 5+109  
 TITLE: Proprietary Review Distribution-Operating Reactor

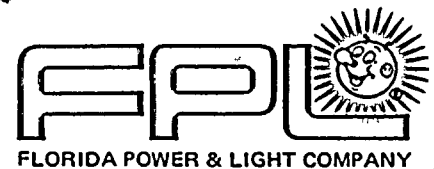
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*12 Encls*

Category	Count	Percentage	Total
1. General	1	100%	1
2. Specific	1	100%	1
3. Other	1	100%	1
4. Total	3	300%	3



May 3, 1984  
L-84-120

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  
Pressure Vessel Material Fracture  
Toughness (NUREG-0744 Rev. 1)

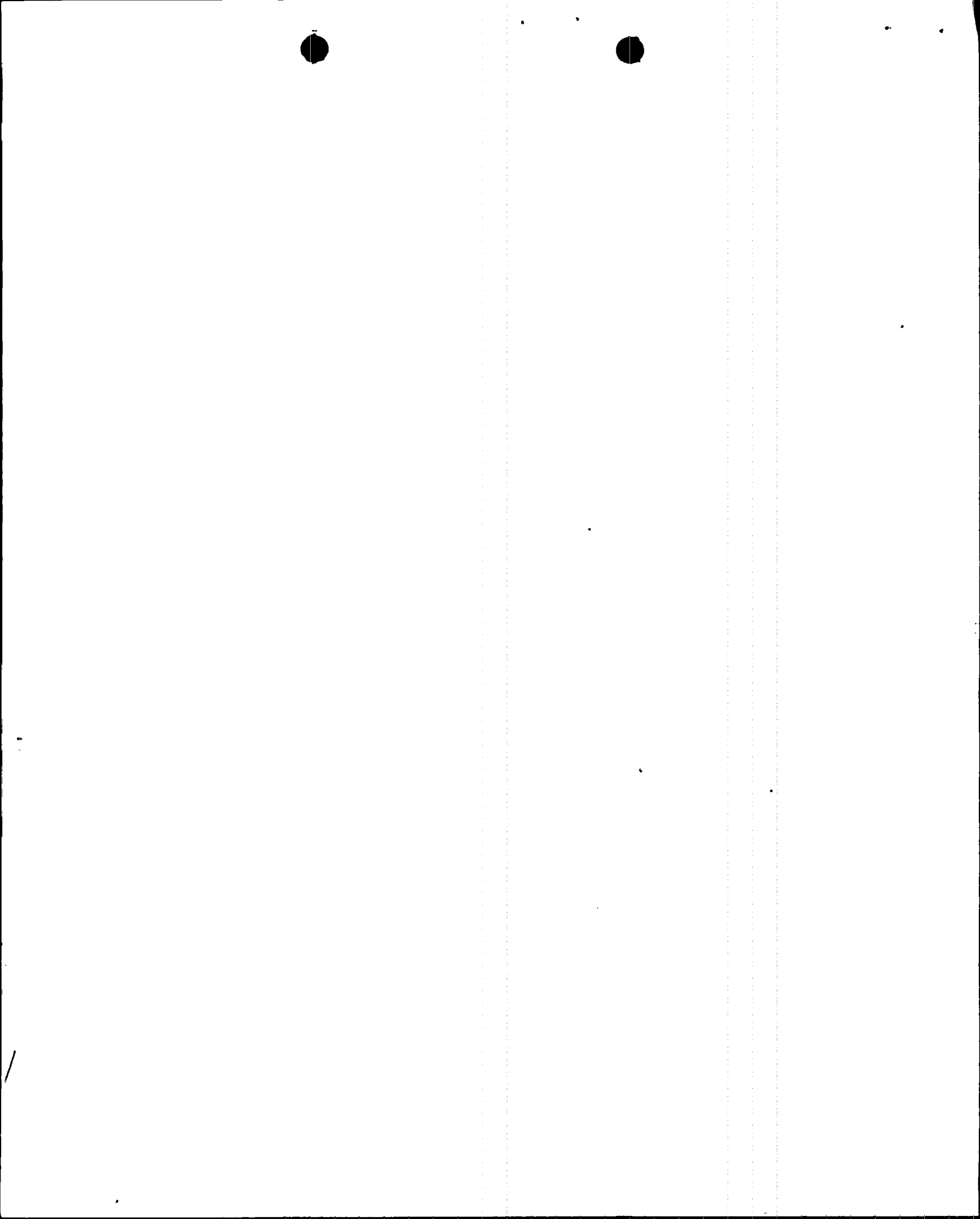
NUREG-0744, Rev. 1 outlines an acceptable method of fracture mechanics analysis to be performed to demonstrate the existence of adequate margin when the fracture toughness requirements of Appendix G to 10 CFR 50 are not met. Our letter L-83-548, dated November 1, 1983, committed to provide such an analysis for Turkey Point Unit 4.

Please find attached the subject analysis. The results of the analysis demonstrates that suitable margins of safety were maintained for projected end of life fluence, as well as at least an additional eight full power years. Consequently, the analysis demonstrates that irradiation damage to the reactor vessel of Unit 4 does not limit the normal operating peak pressure below its current limits for the "upper shelf" portion of the pressure-temperature curve.

Due to the proprietary nature of the subject analysis, we have attached an application for withholding the information from public disclosure in accordance with 10 CFR 2.790.

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Office of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhut, Director  
Page 2

Should you have any questions, or require any clarification of the analysis, feel free to call.

Very truly yours,



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

JWW/JEM/js

Attachment

cc: Mr. James P. O'Reilly, Region II  
Harold F. Reis, Esquire  
PNS-LI-84-156



fracture proof design corporation

STATE OF MISSOURI )  
 )  
 CITY OF ST. LOUIS )

## AFFIDAVIT

Keyren H. Cotter, being duly sworn, deposes and says the following:

1. Fracture Proof Design Corporation ("FPDC") is a duly organized and existing corporation under the laws of the State of Missouri.

2. He is the president of FPDC, and he has executed this Application for Withholding From Public Disclosure and this Affidavit with the approval and authority of FPDC.

3. A certain report entitled "Fracture Mechanics Analysis of the Turkey Point Nuclear Plant Unit 4 Beltline Weld," FPDC Report 83-184, Rev. 2, (PROPRIETARY), submitted, together with this Affidavit and Application for Withholding From Public Disclosure, is the sole and exclusive property of FPDC.

4. The methodology used to perform the analysis in the subject report was developed solely at the expense of FPDC.

5. The methods of analysis used are proprietary to FPDC and have not been disclosed to the public, or to Florida Power and Light Company, except as provided in Paragraph 7 below.

6. The development of certain of the methods of analysis involving the techniques used in this report are not published elsewhere in the literature.

7. Any person who has access to this information, including employees of FPDC, have signed agreements of non-disclosure and confidential treatment of said proprietary information.

8. FPDC is presently in a very strong competitive position because of its exclusive knowledge of these methods of analysis and disclosure of information in the subject report would irreparably damage the competitive position of FPDC.

9. Florida Power and Light Company has not paid fees equivalent to the cost of development of technology used in preparation of the subject report. The total fees received for the analysis represent less than ten percent of the value, to FPDC, of the methodology.





10. Five (5) copies of the report have been given to a Florida Power and Light Company employee who has complied with the provisions of Paragraph 7 above.

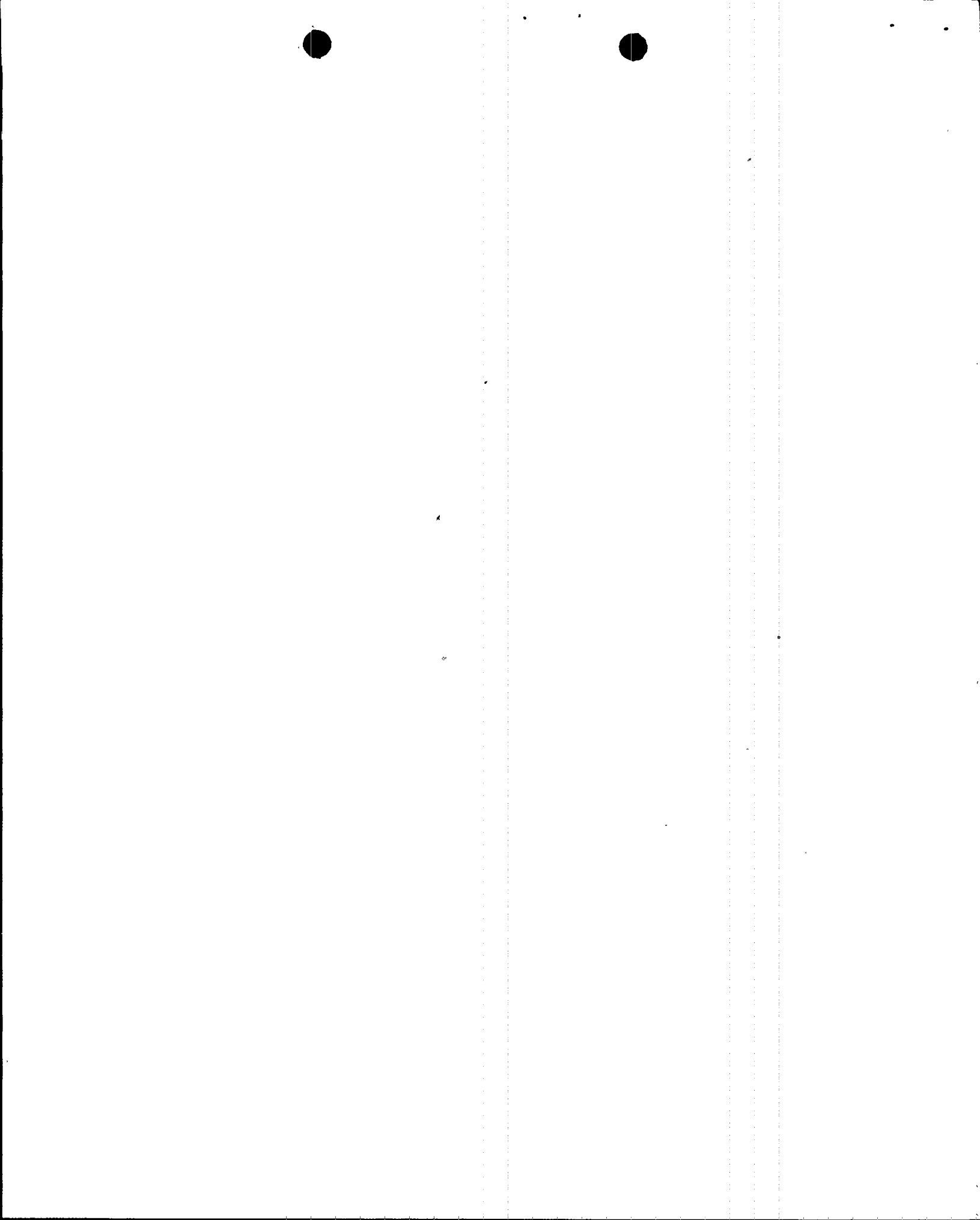
Affiant further states that the foregoing statements are true and accurate to the best of his knowledge and belief, and he hereby acknowledges that he has executed this Affidavit as his own free act and deed.

  
Keyren H. Cotter

Subscribed and sworn to before me this 30th day of April, 1984.

  
Notary Public

My Commission Expires: BETTIE HARRIS  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES 8/17/84  
ST. LOUIS COUNTY



STATE OF FLORIDA

COUNTY OF DADE

}  
} SS.


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

That he is a Group 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.

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Enclosure 1 is proprietary, and therefore, exempt from public disclosure in accordance with Section 9.5 (4) of the NRC "Rules of Practice", Title 10, Code of Federal Regulations, per Attachment 1 of the basic letter provided by Combustion Engineering, Inc.

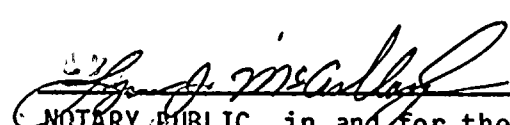


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J. W. Williams, Jr.

Subscribed and sworn to before me this

3 day of MAY, 1984



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

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. FEB 14, 1988  
BONDED THRU GENERAL INS. UND.

My commission expires 2-14-88





May 3, 1984  
L-84-120

Office of Nuclear Reactor Regulation  
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U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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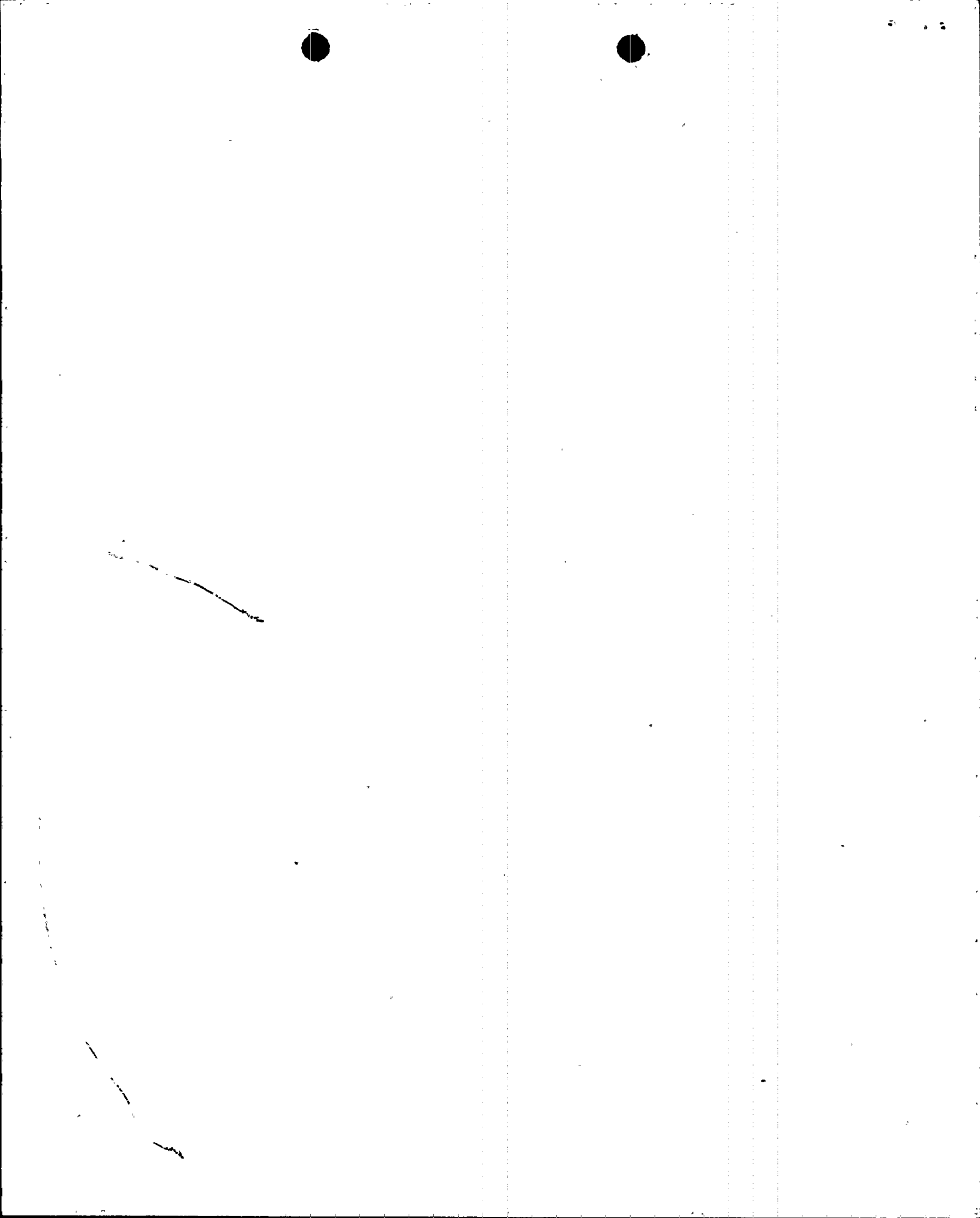
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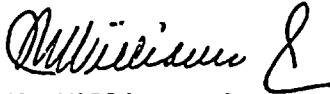
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