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MCDONALD, D. G. PWR Project Directorate 2

SUBJECT: Responds to G Sparks & IAEA request re spent fuel pit overhead door seal replacement. Replacement door does not violate IAEA safeguards program.

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

Dear Mr. McDonald:

Re: Turkey Point Unit 4
Docket No. 50-251
Information for the IAEA

As requested by Mr. Gene Sparks and the IAEA, the attachment to this letter provides information describing the Unit 4 spent fuel pit overhead door seal replacement. It is our understanding that this work does not violate the IAEA safeguards program in place for Unit 4.

Should you require additional information regarding this subject, please contact us.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/SAV/gp

Attachment

cc: Mr. Gene Sparks, USNRC, Washington, D. C. M.S. 88155
Harold F. Reis, Esq.

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ATTACHMENT

Description of Unit 4 Spent Fuel Pit Overhead Door Seal Replacement

The spent fuel pool sliding door seal is an inflatable rubber air seal system intended to provide a weather seal in order to preclude the intrustion of rainwater and dirt into the spent fuel pit.

Due to maintenance difficulties and interferences with the sliding door, the existing air seal has significantly deteriorated and must be replaced. In addition, lack of accessibility makes it impractical to re-install a seal system such as the existing one. This description addresses the replacement of the existing air seals with a system of brush and rubber compression seals. The new system will not require any air supply or deflation interlocks with the door motor. Therefore, the possibility of damage to the seal system is greatly reduced.

The brush and rubber seals shall provide an effective barrier against the intrusion of water, dust, dirt and other deleterious items into the spent fuel pit area. The new seals shall retain their design properties in extreme weather environment. The new seals should also provide a seal against air infiltration such that the monitoring of radioactive releases is not affected. This seal does not perform a safety related function.

There are no specific door seal requirements in the Turkey Point Units 3 and 4 Final Updated Safety Analysis Report. The Cask Drop and Fuel Handling accident analysis and spent fuel pool boiling scenario assume all releases will be discharged to the atmosphere. Therefore, no credits are taken for seal integrity under accident conditions.

A protective tarp shall be positioned prior to commencement of any work so that no dirt, dust or other deleterious items fall into the spent fuel pool.