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SUBJECT: Discusses util 860827 & 0924 commitments for administrative implementation of 7-day limiting condition for operation in Modes 1-4 for emergency diesel generators in addition to Tech Spec requirements. Work scope listed.

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MARCH 04 1987

L-87-102

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

Gentlemen:

Re: Turkey Point Units 3&4
Docket Nos. 50-250 & 50-251
Emergency Diesel Generators

By letters dated August 27, 1986 (L-86-348) and September 24, 1986 (L-86-387), FPL committed to administratively implement a 7 day limiting condition for operation (LCO) in Modes 1, 2, 3, and 4 for the Turkey Point Plant emergency diesel generators (EDGs), in addition to the current Technical Specification 3.7.2.b requirement for notification. Revised technical specifications incorporating a 7 day LCO for the EDGs were submitted to the NRC on November 28, 1986. The current technical specification has no out-of-service time limit.

During the upcoming Turkey Point Unit 3 Cycle 11 refueling outage, we will be performing extensive preventative maintenance on the two EDGs. The scope of work includes:

- (1) Removal and replacement of the exhaust chamber assembly (new component).
- (2) Removal and replacement of the power packs (new components, 20 each EDG).
- (3) Removal and replacement of overspeed trip housing in the upper deck head.
- (4) Removal and replacement of camshaft drive housing in the upper deck head.
- (5) Removal and replacement of cylinder head cover frame assembly (left and right banks).
- (6) Removal and replacement of water expansion tank and lube oil cooler including a core change-out.
- (7) Protection relays and metering circuit calibration.
- (8) Instrument calibrations including pressure and temperature switches and indicators.

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Figure 6 shows the effect of the initial concentration of the monomer on the polymerization rate. The reaction rate increases with increasing initial concentration of the monomer. This is due to the fact that the higher the initial concentration of the monomer, the more active species are present in the system.

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$$\frac{d}{dt} \left(\frac{\partial L}{\partial \dot{x}} \right) = \frac{\partial L}{\partial x}, \quad \frac{d}{dt} \left(\frac{\partial L}{\partial \dot{y}} \right) = \frac{\partial L}{\partial y}$$
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1. On the 11th of January, 1900, I received from Mr. J. H. Adams, of the U. S. Fish Commission, a letter containing the following information:

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific information required.

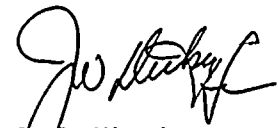
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- (9) Overall generator, voltage regulator, engine control panel, immersion heaters, soakback pump motor, air start compressor motors, and fuel prime pump motor maintenance.
- (10) Required post-maintenance testing.

We estimate that the maintenance, post-maintenance testing, and surveillance testing will take approximately 14 days (working two 12-hour shifts per day) to complete for each EDG. This estimate includes contingency time should additional maintenance be required in the event either one of the EDGs fails to satisfy the acceptance criteria. Because of our commitment to administratively implement a seven 7 day LCO for the EDGs, we request your concurrence to exceed that limit on a one time basis to enable us to perform the planned maintenance. FPL fully understands the importance of minimizing EDG out-of-service times, and will make every effort to complete the work as expeditiously as possible. We will keep the Resident Inspector informed of the status of the work as it progresses. This work will enhance the reliability of the EDGs.

If you have any questions regarding this request, please call us.

Very truly yours,



C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/pm

cc: Dr. J. Nelson Grace, Region Administrator, USNRC Region II
Mr. D. R. Brewer, USNRC Senior Resident Inspector, Turkey Point Plant

