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SUBJECT: Submits requested addl info re emergency power sys enhancement program.

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FPL

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DECEMBER 14 1988

L-88-510

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

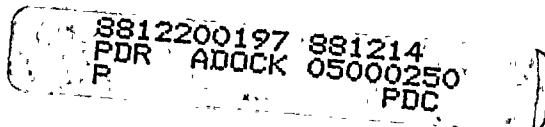
Ref: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Emergency Power System Enhancement Project
TAC Nos. 69023 and 69024

Our previous letter L-88-221, dated May 27, 1988, identified the licensing approach and schedule FPL intends to follow in support of the Emergency Power System Enhancement Project at Turkey Point. As a result of recent discussions with members of the NRC Staff, it was requested that the application of 10 CFR 50.59 and 10 CFR 50.90 to the Enhancement Project and our licensing approach per L-88-221 be clarified. The purpose of this letter is to provide the requested information for your use.

Licensing Approach

The Emergency Power System Enhancement Project will be implemented in two distinct phases consisting of outage and pre-outage activities in order to meet the current Integrated Schedule completion date in 1990. Pre-outage activities will include site preparation; new building construction; placement of equipment and preliminary equipment checkout. Since these activities will not have a significant impact on the operation of existing plant systems, they will be performed under 10 CFR 50.59 as per our normal plant change/modification process. As explained further below, the application of 10 CFR 50.59 is not intended to preclude NRC review of the enhanced electrical system design, but rather to allow FPL to meet the Integrated Schedule completion date in 1990.

Actual modifications to the existing electrical system and tie-in of the new emergency diesel generators will be performed during a dual unit outage currently scheduled for 1990. Since the electrical system modifications will require Technical Specification changes, a formal License Amendment request pursuant to 10 CFR 50.90 will be submitted for NRC approval. In accordance with our letter L-88-221, this License Amendment request will be submitted in April 1989. NRC approval of this License Amendment request is required by October 1989 to support a dual unit outage beginning as early as January 1990. Actual modifications to the existing emergency power system will not take place without the NRC's approval of this License Amendment request.



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Because of the magnitude and complexity of the electrical system modifications and the limited time available for NRC review of the License Amendment request, FPL will also provide the NRC with several submittals in advance of our License Amendment request. These submittals and their content are addressed in L-88-221 and are summarized as follows:

- o Design Report - Explain scope of Enhancement Project and new electrical system configuration. Describe proposed implementation plan.
- o Testing (two submittals) - Explain test programs which will be followed to verify operability of enhanced emergency power system and to qualify new emergency diesel generators.
- o Safety Analysis - Provide results of analyses which demonstrate safety of enhanced emergency power system.

The intent of these submittals is to afford the NRC the opportunity to review the proposed electrical system modifications prior to receipt of our License Amendment request. FPL requests that NRC review of the proposed electrical system modifications be documented via issuance of a Safety Evaluation Report (SER). FPL expects that the NRC would review and approve all proposed electrical system modifications (both outage and pre-outage changes) under this SER.

It is our understanding, based on previous NRC reviews of technical issues (i.e., Auxiliary Electrical Power Upgrade - 1984, and Emergency Diesel Generator Loading - 1986), that an SER can be issued by the NRC Staff to document their review of a technical submittal without direct application under 10 CFR 50.90. To support the current project schedule for submittal of FPL's License Amendment request, issuance of the SER would be needed by April 1989. If the circumstances of this project do not lend themselves to this process, FPL would be willing to work with the NRC Staff to make our licensing submittals conform to the appropriate NRC administrative and schedular requirements.

To date, the Enhancement Project Design Report and our testing submittal associated with emergency diesel generator qualification (Reference L-88-269 and L-88-454 respectively), have been issued for NRC review in accordance with the approach outlined above. Our testing program submittal and safety analysis report are scheduled to be issued by February 15, 1989 and February 24, 1989, respectively.

[illegible]

Q. Now, you said that the defendant was not in the car at the time of the shooting, is that correct?

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Should you have any questions, please contact us.

Very truly yours,



W. F. Conway
Senior Vice President - Nuclear

MJK/DCB/lg
NIL/US-REG1

cc: Malcolm L. Ernst
Acting Regional Administrator,
Region II, USNRC

Senior Resident Inspector,
USNRC
Turkey Point Plant

