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EBNETER,S.D. Region 2, Ofc of the Director

SUBJECT: Documents util 890718 request & justification for discretionary enforcement re intake cooling water sys.

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FPL

July 19, 1989
L-89-266

Mr. Stewart D. Ebneter
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Dear Mr. Ebneter

Re: Turkey Point Unit 4
Docket No. 50-251
Intake Cooling Water System
Request for Discretionary Enforcement

On July 18, 1989, during discussions with the NRC Region II and Headquarters Staffs, Florida Power & Light Company (FPL) requested NRC approval to isolate the 4A intake cooling water (ICW) header to allow cleaning of the 4A ICW basket strainer. The NRC subsequently approved discretionary enforcement for a period of time not to exceed one hour. The NRC requested that FPL keep the Turkey Point NRC Resident Inspector informed of the plant status during backwash of the 4A strainer. The purpose of this letter is to document FPL'S request and the justification for the discretionary enforcement, as well as to identify the circumstances which led to the discretionary enforcement.

At 2:25 PM on July 16, 1989, with Unit 4 in Mode 1, the 4B ICW header was declared inoperable due to low flow conditions. Technical Specification 3.4.5.b allows the unit to remain at power for 24 hours with one ICW header out of service before placing the unit in hot standby, and further allows the unit to remain in hot standby for 48 hours before going to cold shutdown. Unit 4 shutdown was initiated at 3:25 AM on July 17, 1989 and the unit came off line at 5:52 AM. The unit entered Mode 4 at 12:30 AM on July 18, 1989. Troubleshooting of the ICW System indicated that the disk for the 4-50-308 valve may be separated from the upper shaft.

Examination and repair of the 4-50-308 valve requires isolation of the 4B ICW header. Although no degraded flow conditions were indicated for the 4A ICW header, to ensure the maximum flow capability, FPL determined that backwash of the 4A ICW strainer was prudent. However, with the 4B ICW header at reduced flow (approximately 8200 gpm) and therefore, technically inoperable, NRC approval was required to isolate the 4A ICW header and backwash the strainer.





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At approximately Noon on July 18, 1989, FPL contacted the NRC Senior Resident Inspector to discuss the situation with him and about 3:30 PM FPL contacted NRC Region II to request approval for the proposed action.

FPL had determined that the proposed action was justified based on:

1. the short duration (less than one hour) that the 4A ICW header would be isolated with the 4B header in a degraded flow condition, and

2. an engineering calculation that indicated that the 4B ICW header flow was adequate to remove the existing operational component cooling water heat loads, and

3. an engineering calculation that indicated sufficient time to restore flow through the 4A ICW header in the event that flow through the 4B ICW header was instantaneously lost while cleaning the 4A strainer, such that the limiting components in the component cooling water system would not be affected, and

4. the stationing of operators to immediately restore flow in the 4A ICW header in the unlikely event of loss of flow in the 4B ICW header.

This justification was reviewed by the Turkey Point Plant Nuclear Safety Committee.

FPL appreciates the prompt consideration given by the NRC Residents and the Region II and Headquarters Staffs in this matter.

Very truly yours,

C.O. Woody
Acting Senior Vice President - Nuclear

COW/PLP/vmg

cc: Document Control Desk, USNRC
Senior Resident Inspector, USNRC Turkey Point Plant