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 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

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 RECIP.NAME RECIPIENT AFFILIATION
 EBNETER,S.D. Region 2, Ofc of the Director

SUBJECT: Documents request & justification re discretionary enforcement to extend out of svc time for CSP 4A.

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L-89-292

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

Dear Mr. Ebnetter:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
4A Containment Spray Pump
Request for Discretionary Enforcement

On August 9, 1989, during discussions with the NRC Region II Staff, Florida Power & Light Company (FPL) requested NRC approval to extend the allowed out of service time for the 4A containment spray pump. The NRC subsequently approved discretionary enforcement for a 48 hour period. 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.

The 4A containment spray pump had been refurbished during the last Unit 4 refueling outage and subsequent testing showed acceptable performance. The results of the May 30, 1989 monthly surveillance test, however, showed an increase in shaft vibration into the alert range, and as a result, the frequency of testing was increased. On August 8, 1989, at 9:30 a.m., the pump was taken out of service for balancing and alignment. Following this activity, the pump was retested. The testing identified vibration beyond the acceptance criteria and the pump was declared inoperable. An event response team (ERT) was formed and actions were taken to restore the pump to service. The ERT concluded that motor replacement was required and that insufficient time remained in the allowed out of service period to accomplish the replacement. The repairs were expected to take 24 hours and six additional hours were needed for testing. Because the required spare parts for the motor replacement were available, management was confident that the repairs could be completed and the pump tested within an additional 48 hour period. Accordingly, following a review of the safety aspects of the situation, a decision was made to request NRC approval of an extension of the allowed out of service time.

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Extending the allowed out of service time from 24 hours to 72 hours is considered acceptable for the following reasons:

1. The 72 hour time period is consistent with industry practice as evidenced by the requirements of the Standard Technical Specification for Westinghouse Pressurized Water Reactors (NUREG-0452, draft Rev. 5). Specification 3.6.2.1 allows one of two containment spray systems to be inoperable for a period of seven days before shutdown is required provided other containment cooling components are operable.
2. The Final Draft of the Turkey Point Revised Technical Specifications issued by the NRC on March 14, 1989 provides a 72 hour allowed out of service time. This specification was included in our June 5, 1989 license amendment request to adopt the revised technical specifications.
3. Before taking the 4A containment spray pump out of service for maintenance, the 4B containment spray pump was tested to demonstrate operability as required by existing Technical Specification 3.4.2.b.2. The pump results were satisfactory.
4. During the 48 hour extension, the three emergency containment coolers and the 4B containment spray pump will not be taken out of service for maintenance.

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

Very truly yours,

R. J. Acosta
for

C. O. Woody
Acting Senior Vice President - Nuclear

COW/PLP/gp

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

