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 FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
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SUBJECT: LER 88-026-02:on 881107,Units 3 & 4 outside final safety
 analysis rept design basis re hurricane flood.

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SEPTEMBER 8 1989

L-89-330
10 CFR 50.73

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Reportable Event: 88-26 Revision 2
Date of Event: November 7, 1988
Units 3 and 4 Outside the Final Safety Analysis Report
Design Basis with Regard to Hurricane Flood Protection

The attached Licensee Event Report Revision is being submitted pursuant to the requirements of 10 CFR 50.73 to provide an update on the subject event.

Very truly yours,

C. O. Woody
for Acting Senior Vice President - Nuclear

COW/JRH/cm

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Turkey Point Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 2 5 0										PAGE (3) 1 OF 0 5								
TITLE (4) Units 3 and 4 Outside the Final Safety Analysis Report Design Basis with Regard to Hurricane Flood Protection																												
EVENT DATE (5)			LER NUMBER (6)					REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)																	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES					DOCKET NUMBER(S)														
1	1	0	7	8	8	0	2	6	0	2	0	9	0	8	8	9	Turkey Point Unit 4					0 5 0 0 0 2 5 1						
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																									
5			20.402(b)					20.406(c)					50.73(a)(2)(iv)					73.71(b)										
POWER LEVEL (10)			20.406(a)(1)(i)					50.38(c)(1)					50.73(a)(2)(v)					73.71(c)										
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			20.406(a)(1)(iii)					50.73(a)(2)(i)					50.73(a)(2)(vii)															
			20.406(a)(1)(iv)					50.73(a)(2)(ii)					50.73(a)(2)(viii)(A)															
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			20.406(a)(1)(vi)					50.73(a)(2)(iv)					50.73(a)(2)(ix)															
LICENSEE CONTACT FOR THIS LER (12)																												
NAME Ed Lyons, Regulation and Compliance Engineer															TELEPHONE NUMBER													
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															3 0 5 2 4 6 - 6 7 3 1													
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																												
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																												

On November 7, 1988, at approximately 1900, with Unit 3 in cold shutdown and Unit 4 defueled, it was determined that Units 3 and 4 were outside their design basis with regard to hurricane flood protection. The Final Safety Analysis Report states, "The unit is designed for a hurricane tide to an elevation of +20 feet with wave run-up to an elevation of 22.5 feet on the east side of the unit." The following conditions were identified by a Quality Assurance auditor:

- 1) The diesel oil transfer pumps are mounted at elevation 19.0 feet without flood protection.
- 2) A section of a flood protection wall, approximately 8 feet in length, between the Emergency Diesel Generator (EDG) building and the Unit 3 switchgear enclosure, has been temporarily removed as a portion of a plant modification.
- 3) The stoplogs on the east face of the Auxiliary Building provide protection only to elevation 20 feet. Items 1 and 2 above were caused by design error. Item 3 was caused by the lack of plant drawings that clearly identify stop log details. As an interim corrective action in the event of a hurricane warning, a temporary flood protection dike will be erected using sandbags and polyethylene sheet. As long term corrective actions, plant modifications will be performed to provide flood protection for the above concerns.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF THE EVENT

On November 7, 1988, at approximately 1900, with Unit 3 in cold shutdown and Unit 4 defueled, it was determined that Units 3 and 4 were outside their design basis with regard to hurricane flood protection. Appendix 5A of the Final Safety Analysis Report (FSAR) states, "The unit is designed for a hurricane tide to an elevation of +20 feet with wave run-up to an elevation of 22.5 feet on the east side of the unit." (All elevations are referenced from mean low water level.) The following concerns were identified by a Quality Assurance auditor on October 19, 1988, and subsequently evaluated by FPL's Nuclear Engineering Organization.

- 1) The diesel oil transfer pumps are located adjacent to the northeast corner of the Emergency Diesel Generator (EDG) building at elevation 19.0 feet. No flood protection is provided for these pumps.
- 2) A section of wall approximately 8 feet in length between the EDG building and the Unit 3 switchgear enclosure has been temporarily removed as a portion of a plant modification. This wall serves as a flood protection barrier. The modification package identifies this wall as a flood wall and provides requirements to restore the wall following implementation of the modification, but does not provide compensatory measures in the event of a hurricane. The modification package was prepared by a FPL contractor. The wall was removed in approximately mid-June, 1988.
- 3) The stoplogs on the east face of the Auxiliary Building provide protection only to elevation 20 feet. Based on interviews with plant personnel, it appears that these stop logs were originally constructed of wood. At some point in time, the wood stop logs were replaced with diamond plate. However, the plate did not provide protection to the correct height. Plant drawings provide details for the channels that the stop logs fit into, but do not provide details on the stop logs themselves. It is believed that the wood stop logs were replaced with plate because the wood became warped or rotted.

CAUSE OF THE EVENT

- 1) Item 1 above was caused by inadequate design in that no provisions are made for flood protection of the diesel oil transfer pumps.
- 2) Item 2 above was caused by a design oversight. It was recognized that the wall was a flood barrier, however, the modification package did not provide for compensatory measures in the event of a hurricane warning.
- 3) Item 3 above was caused by a lack of plant drawings that provide clear details of the stop logs.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
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Turkey Point Unit 3	05000250	88	026	02	03	OF	05

TEXT (If more space is required, use additional NRC Form 366A's) (17)

ANALYSIS

A technical assessment of the three concerns was performed by FPL's Nuclear Engineering Organization. This assessment includes a technical evaluation of the required flood protection (stoplog heights) for openings on the east side of the Auxiliary Building. This evaluation concluded that the plant was designed to provide flood protection to an elevation of +20 feet for hurricane tide, with wave run-up to an elevation of +22 feet on the east side of the Auxiliary Building and +22.5 feet for the Intake Cooling Water pumps. A review of original plant calculations for hurricane flooding indicated that the maximum probable hurricane tide would occur at elevation 18.3 feet and the maximum wave run-up would occur at elevation 21 feet for the east side of the Auxiliary Building. Additionally, wave run-up to 22.5 feet was predicted for the area of the intake structures. The plant grade is at elevation 18 feet. Following is an assessment of each of the three concerns.

1) Flood protection not provided for the diesel oil transfer pumps.

The diesel oil transfer pumps are located adjacent to the northeast corner of the EDG enclosure. The pumps are mounted on a 1 foot tall concrete pedestal which would place the base of the pumps at elevation 19 feet. The pump motors are located 6 inches above the base, which would make the pump vulnerable to any wave run-up or water surge that exceeds elevation 19.5 feet. The maximum water stage for a maximum probable hurricane at Turkey Point is to elevation 18.3 feet. Thus, the pump motors are in no danger of being immersed, but could experience splashing from wave run-up. Since the pumps are designed for outside service, they should be unaffected by conditions short of immersion. Furthermore, the fuel transfer pumps are located in an area of the plant where wave run-up is not a significant concern. Any wave run-up would be significantly retarded and dampened due to the numerous structures located east of the pumps.

2) Temporary removal of a portion of flood protection wall.

In the event of a hurricane warning (which is issued prior to a hurricane striking the coast) plant emergency procedures require installation and inspection of the flood protection stoplogs. The required stoplog which abuts the subject wall would not be able to be installed due to the absence of the wall. Although plant procedures do not provide specific actions to be taken when a stoplog cannot be installed, it is reasonable to assume that this condition would be noted and compensatory measures initiated. If compensatory measures could not be completed prior to the maximum probable hurricane flood at elevation 18.3 feet, some localized flooding could occur. The effect of this potential flooding is not known.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

- 3) Stoplogs on the east side of the Auxiliary Building provide protection to only 20 feet.

Results from the original wave run-up analysis indicate that the maximum wave run-up at the east face of the Auxiliary Building would be to elevation 21 feet. This value was obtained without modeling any barriers or ground elevation changes between the intake structure and the Auxiliary Building. A review of the existing configuration east of the Auxiliary Building shows numerous barriers and an elevated roadway (elevation 19 feet, 1 inch) between the Auxiliary Building and the intake structure. It is assumed that the barriers and the elevated roadway would retard and reduce wave run-ups from that of the original model, however, it is not known to what extent this would occur.

CORRECTIVE ACTIONS

- 1) A safety evaluation was prepared by FPL's Nuclear Engineering Organization. This evaluation delineates requirements for temporary flood protection of the diesel oil transfer pumps. The safety evaluation requires that, in the event of a hurricane warning, temporary flood protection dikes be constructed using sandbags and polyethylene sheet. This is a short term action until the permanent action identified in corrective action 8 below can be completed.
- 2) The modification package which removed the flood protection wall has been revised to provide instructions and details for the erection of a temporary flood barrier in the event of the issuance of a hurricane warning during implementation of the modification.
- 3) Emergency Plan Implementing Procedure, EPIP-20106, was revised to require the erection of a temporary flood barrier, in the event of a hurricane warning, as described by corrective action 1.
- 4) The Engineering Contractor responsible for preparation of the modification package has issued a memo to appropriate personnel identifying this event and the need to provide compensatory measures when a modification requires breaching a flood barrier.
- 5) The Engineering Contractor responsible for preparation of the modification package revised its procedure for preparation of Turkey Point engineering packages to require compensatory measures be provided when a modification requires breaching a flood barrier.
- 6) The flood protection wall which was removed was restored following completion of the modification, as required by the modification package.
- 7) Flood protection stop logs on the east face of the Auxiliary Building were modified to provide protection to elevation 22 feet. Based upon a subsequent evaluation concerning material adequacy, engineering is re-evaluating the other flood protection stop logs around the north, south, and west sides of the plant. Preliminary results of calculations indicate that some stop logs may require modification. An engineering package will be issued if any modifications are required.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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- 8) Permanent flood protection will be provided for the diesel oil transfer pumps. This action will be completed during the dual unit outage for the EDG Upgrade Project, due to extensive unavailability of the EDGs during the construction period. The EDG Upgrade Project is on the Integrated Schedule.
- 9) A drawing identifying the network of flood protection barriers, and a drawing identifying the flood protection stop log sections and details for the east face of the Auxiliary Building have been prepared and placed in the FPL Drawing Control System via a Design Equivalent Engineering Package (DEEP).
- 10) An FSAR change package was issued to clarify the design basis hurricane flood elevations and to show the network of barriers for external flood protection. The FSAR change package will be included in Revision 8 of the FSAR to be issued in July 1990.

ADDITIONAL INFORMATION

Similar events: none