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

SUBJECT: Requests discretionary enforcement of Tech Spec 3.4.5.b.2.

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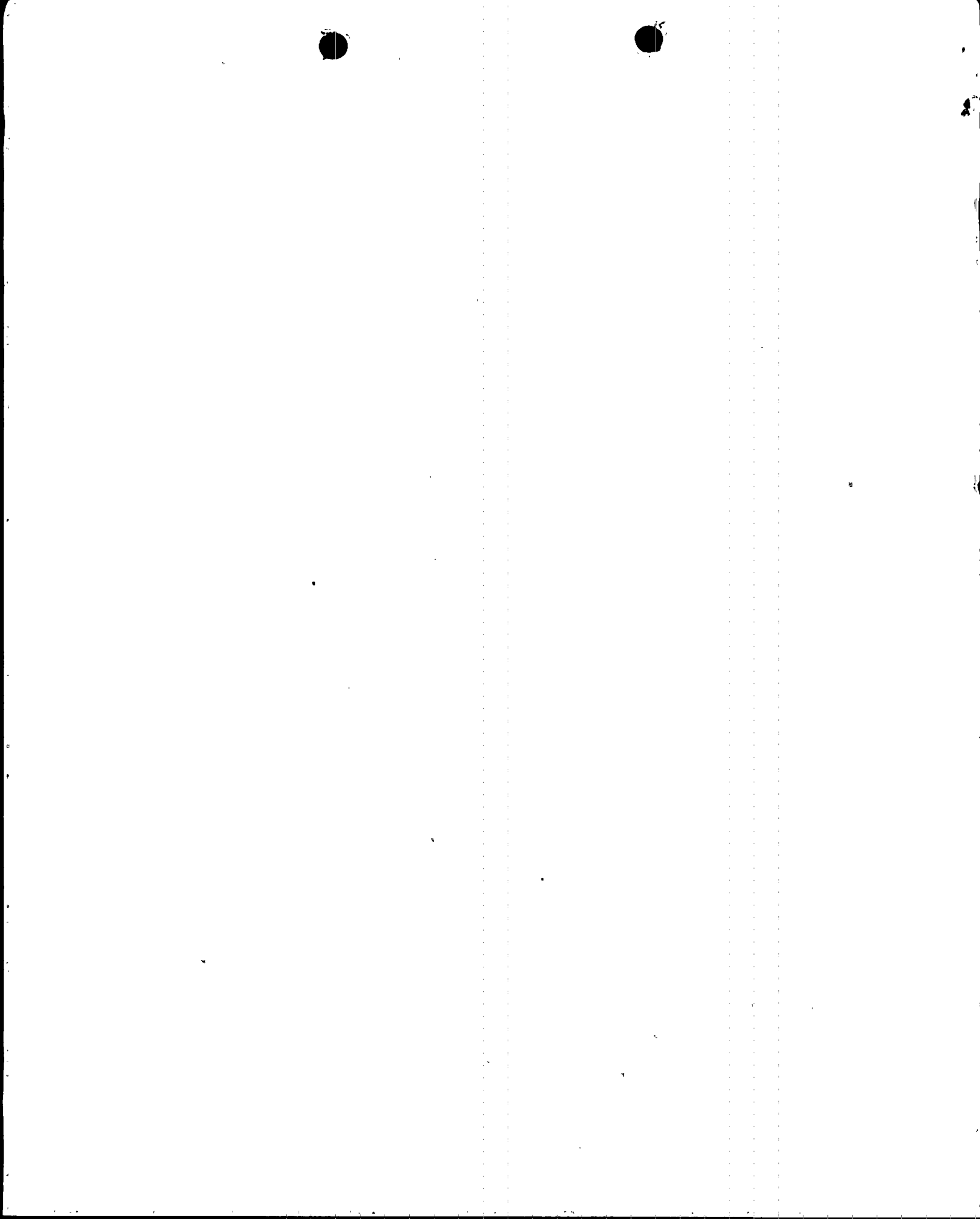
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Stewart D. Ebnetter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta St., N.W., Suite 2900
Atlanta, GA 30323

Mr. Stewart D. Ebnetter:

Re: Turkey Point Unit 4
Docket No. 50-251
4B Intake Cooling Water Pump Replacement
Discretionary Enforcement Request

This letter is a request for discretionary enforcement of Technical Specification 3.4.5.b.2,

During the evening of May 13, 1990, a Low ICW pressure alarm was received and a reduction of flow from the Unit 4 Intake Cooling Water (ICW) pump was noted. Immediately thereafter the "C" pump was started and the "B" pump was stopped. Pressure and flow returned to normal. During the day on May 14, 1990 various testing was performed on the "B" pump and an inspection was made of the pump intake by a diver. Subsequent Inservice Tests of the pump still found the "B" pump in the alert range for delta-P.

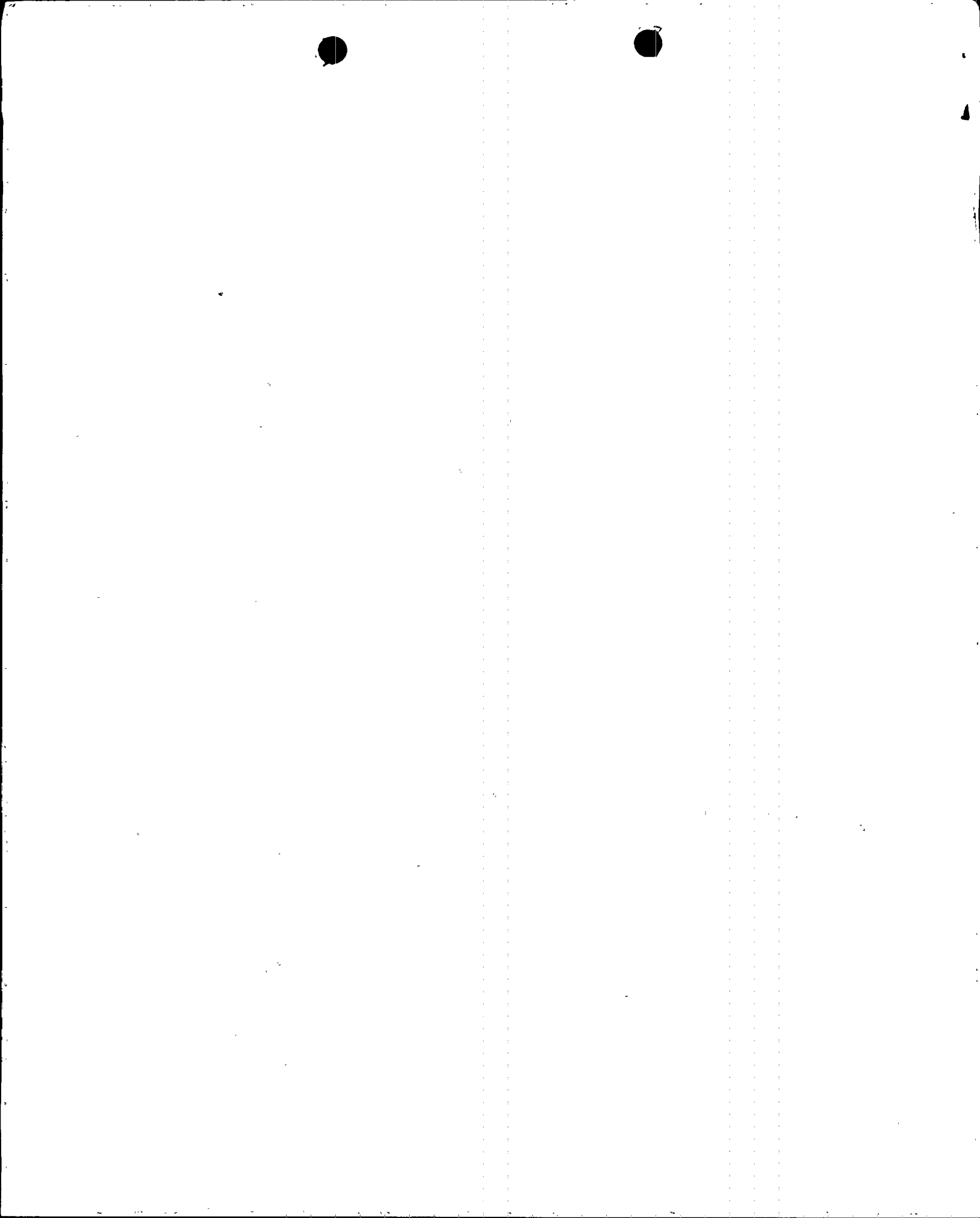
The decision was made to replace the "B" pump because of the rapid change in flow characteristics. The Unit 4 "B" ICW pump was still considered operable but was taken out of service for the replacement starting at 0122 hours Eastern Daylight Time on May 15, 1990. The amount of time required for the replacement is estimated to be 17 hours with 3 to 4 additional hours of post maintenance testing. It is not anticipated that extra time for the replacement will be required.

Technical Specification 3.4.5.b.2 states the following:

- "b. During power operation the requirements of 3.4.5.a., above may be modified to allow any one of the following components to be inoperable provided the remaining systems are in continuous operation. ...
- 2. One intake cooling water pump may be out of service for a period of 24 hours."

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It should be noted that a 7 day LCO for two pumps with independent power supplies is contained in the draft Revised Technical Specifications as submitted to the NRC on June 5, 1989. The Revised Technical Specifications for one ICW pump out of service are as follows:

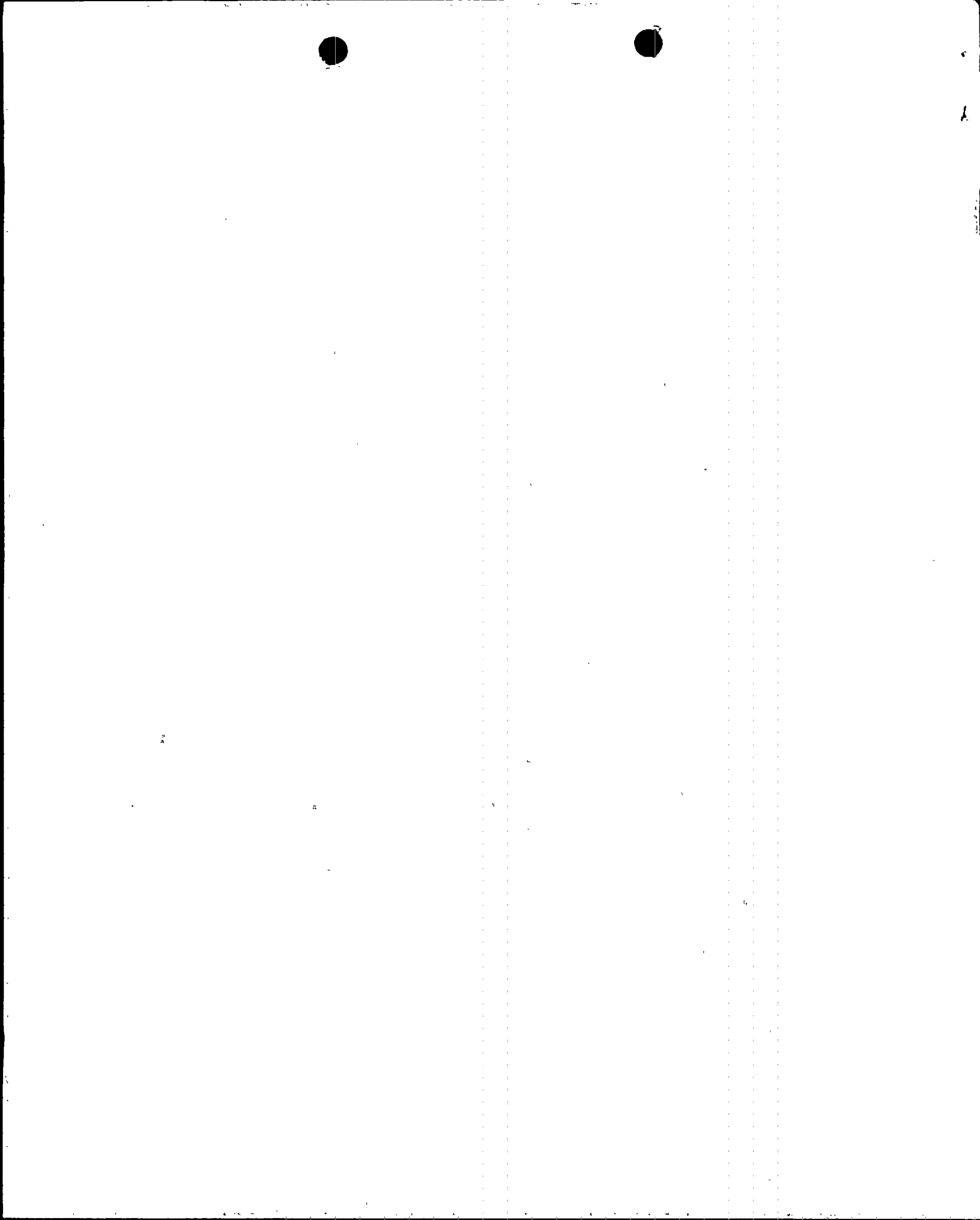
"3.7.3 ACTION

- a. With only two ICW pumps with independent power supplies OPERABLE, restore the inoperable pump to OPERABLE status within 7 days or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

The revision allows operation with two operable ICW pumps for 7 days provided they are powered from independent power supplies. The current Technical Specification allows operation with two ICW pumps for up to 24 hours. Turkey Point plant has three 100% capacity ICW pumps, two of these pumps are powered from independent power supplies ("A" ICW pump from the 4A 4160 Volt bus and "C" ICW pump from the 4B 4160 Volt bus) and the remaining pump ("B") is a standby pump normally powered from the 4B bus. The safety analysis requires one ICW pump to remove design basis heat loads. Operability of two ICW pumps from independent power supplies provides redundancy and assurance that at least one pump is operable assuming a single failure. The existence of a third pump provides additional assurance of pump availability.

Both operating ICW pumps are normally lined up to the two headers supplying flow to three Component Cooling Water heat exchangers. Each pump has a design flow of 16,000 gallons per minute which can remove a nominal accident heat load of 120 million BTU/hr with a Intake Canal Water temperature of 95 degrees F. The Unit 4 "A" and "C" ICW pumps meet the acceptance criteria for operability based on the last Inservice Test completed on May 8, 1990.

Due to difficulties which could be encountered during the replacement effort, an extension beyond the presently required 24 hours is requested. No further complications are expected. However, since the pump replacement and post maintenance testing process is complex, an extension to a total Limiting Condition for Operation (LCO) of 7 days is requested. The work effort to replace the pump will continue until completion for 24 hours per day and completion of the effort is expected prior to the end of the 24 hour LCO. However, consistent with the draft Revised Technical Specifications, if the "B" ICW pump is not returned to an operable status by 0122 hours on May 22, 1990, Unit 4 will be placed in hot standby within 6 hours.



Based upon the above analysis and the expedited replacement of the "B" ICW pump, the plant will not be placed in a condition that compromises the health and safety of plant personnel or the general public.

Very truly yours,



K. N. Harris
Vice President - Turkey Point

JHG/JEK/jek

cc: Document Control Desk, USNRC
Dr. G. E. Edison, Project Manager, NRR, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

