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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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SUBJECT: Responds to commitment re reverse testing of containment  
 isolation valves per IRs 50-250/90-13 & 50-251/90-13.

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JUL 16 1990

L-90-264  
10 CFR 50, App. J.

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

Gentlemen:


Re: Turkey Point Units 3 and 4  
Docket No. 50-250 and 50-251  
Response to NRC Inspection Report Number 50-250/251-90-13 Regarding Licensees Commitment For  
Action Plan/Justification Concerning Reverse Testing of Containment Isolation Valves

On May 18, 1990, during the exit meeting for NRC Inspection 50-250/251-90-13, Florida Power and Light (FPL) agreed to provide the NRC with a corrective action plan (attachment 1) for reverse testing of gate valves within 60 days. The plan addresses penetrations 16 and 53 for Unit 3 only and penetrations 11, 47, 54A and 54B for both units. This action plan also addresses an evaluation of testing requirements for additional leak paths for manual valves between the containment and the first isolation valve.

On May 18, 1990, during the same exit meeting, FPL agreed to correct the position of a containment spray nozzle determined to be out of alignment with the other containment spray nozzles or to provide justification for leaving in its current configuration. This condition was evaluated and determined to not represent any adverse spray or hydraulic concerns with respect to the system function in 1983. Although the condition was determined not to represent an adverse condition, potential actions to correct the misalignment are being reviewed and a final disposition of the problem will be presented in the response to Non-Conformance Report 90-0188. The response is scheduled to be issued by Engineering by September 30, 1990.

Should you have any questions, please contact us.

Very truly yours,

  
K. N. Harris  
Vice President  
Turkey Point Plant Nuclear

KNH/DPS/ds

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

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Attachment 1

**Turkey Point Units 3 & 4  
Reverse Testing of Containment  
Isolation Valves**

- References :
- 1) NRC Inspection Report 90-13, dated June 13, 1990
  - 2) REA TPN-86-067
  - 3) FPL Engineering Evaluation JPN-PTP-SEMJ-89-022, dated June 1, 1989
  - 4) FPL memo JPN-PTP-89-1769, dated July 6, 1989
  - 5) FPL memo JPN-PTN-90-3903, dated July 10, 1990

Per the requirements of Reference 1, this correspondence outlines the action plan for resolution of the remaining NRC concerns regarding reverse testing of containment isolation valves. There are two components of the NRC's concerns as summarized below:

- Item 1) Reverse testing of gate valves. The NRC, per Reference 1, has accepted the conclusions reached by References 3 & 4 with respect to reverse testing of butterfly and diaphragm valves. The NRC did not accept the evaluation conclusions regarding reverse testing of gate valves and therefore additional actions are required. This affects penetrations 11, 16, 47, 53, 54A and 54B for Unit 3 and penetrations 11, 47, 54A and 54B for Unit 4.
- Item 2) An additional leak path through the valve packing and bonnet seals of manual valves located outside containment between the containment wall and the isolation valve potentially exists and may not be tested by Local Leak Rate Testing (LLRT).

The action plan to respond to the above items is described as follows:

Item 1:

- A) The gate valves identified above for penetrations 16 and 53 (for Unit 3 only) in Item 1 will be replaced during the next Unit 3 refueling outage (scheduled for August/December, 1992) with valves that allow for reverse testing. This item requires a Plant Change / Modification (PC/M) and associated procurement activities.
- B) For the remaining penetrations (11, 47, 54A, and 54B for both units), Engineering will provide further evaluations as required on a penetration by penetration basis. This evaluation is scheduled to be completed by December, 1991. If a conclusion is made that plant modifications are required, Engineering will inform the plant and provide the appropriate documentation for any modifications. References 3 and 4 provide sufficient basis (for penetrations 11, 47, 54A and 54B only) to demonstrate compliance with 10 CFR 50 Appendix J requirements.

Item 2:

Engineering will perform a review on a penetration by penetration basis for potential leak paths through the valve packing and the bonnet seals. This review will encompass all penetrations within the NRC's concern profile and identify any recommended upgrades. This review is scheduled to be completed by December, 1991.

