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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250
 AUTH. NAME AUTHOR AFFILIATION
 GOLDBERG, J.H. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Informs that util will not replace, but will retube component cooling water HXs, per Generic Ltr 89-13.

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SEPTEMBER 28 1990

L-90-211

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

Gentlemen:

Re: Turkey Point Unit 3
Docket No. 50-250
Component Cooling Water
Heat Exchanger Replacement

By letter L-90-29, dated January 30, 1990, Florida Power and Light Company (FPL) submitted responses to the NRC regarding Generic Letter 89-13, "Service Water Problems Affecting Safety-Related Equipment". By letter L-89-278 dated July 31, 1989, FPL addressed the overall weaknesses identified by the NRC in Inspection Report 88-32, NRC Maintenance Team Inspection. In these letters FPL informed the NRC of its intention to replace the Unit 3 Component Cooling Water (CCW) heat exchangers as part of an effort to improve the performance and availability of the CCW system.

During the winter-1990 Unit 3 refueling outage, a 100% tube inspection of all three CCW heat exchangers was performed using eddy current testing methods. The testing and inspection process indicated that only 120 of approximately 4875 tubes in these heat exchangers required tube plugging or replacement; overall tube and tube sheet conditions were excellent. Because of the good general condition of the heat exchangers, the success of the chemical injection program and the ease and cost effectiveness of the retubing effort, FPL performed selective retubing in lieu of heat exchanger replacement during the winter outage. FPL plugs rather than replaces tubes in regions of the tube sheet which exhibit high stress and when replacement time is a factor. FPL has replaced 156 tubes, which included a number of tubes which were previously plugged. Only 111 tubes remain plugged in the CCW heat exchangers. The retubing effort proved to be a relatively simple task with no leaks detected during inservice testing. FPL has determined that, as a result of the retubing effort, the heat exchange capability of the retubed heat exchangers are equivalent to that of the new heat exchangers which were replaced on Unit 4 during the last refueling outage of that unit. FPL intends to selectively retube the Unit 3 CCW heat exchangers based on eddy current test results.

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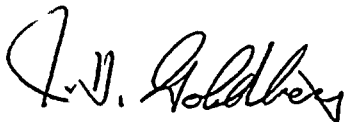
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This action as well as the other actions identified in the letters referenced above (e.g. the chemical injection program, surveillance and maintenance programs, system engineer oversight, etc.), will continue to ensure that the CCW heat exchangers perform their design function.

In summary, FPL does not intend to replace the Turkey Point Unit 3 CCW heat exchangers. FPL will, instead, selectively retube these heat exchangers to ensure that they continue to perform their design function.

Should there be any questions regarding this subject, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. H. Goldberg". The signature is fluid and cursive, with the first name "J." and last name "Goldberg" clearly distinguishable.

J. H. Goldberg
President
Nuclear Division

JHG/JEK/lef

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

