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SUBJECT: Lists util commitments re emergency power sys enhancement
 outage, per 900717 meeting.

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OCT 05 1990
L-90-352

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
Emergency Power System Enhancement Outage

On July 17, 1990, Florida Power & Light Company (FPL) met with the NRC to discuss the planning and status of the Emergency Power System (EPS) enhancements dual unit outage at the Turkey Point Plant. At this meeting FPL discussed the current project status, the 10 CFR 50.59 review of the plant configuration during the outage, the plan for performing the modifications, the spent fuel pool cooling configuration during the modifications, and configuration control during the outage. Following discussion of the above items, FPL committed to submit the following information:

1. A list of the Technical Specifications that will be in effect while both reactor cores are defueled;
2. A list of equipment that will be functional while both cores are unloaded and all emergency diesel generators are out-of-service, and
3. A description of the Configuration Control Program that will be in effect during the outage.

This information is included in Attachments 1 through 3 to this letter. Responses to certain questions raised during the July 17, 1990 meeting are included in Attachment 4.

FPL is developing a plant procedure (procedure TP-645) which will include specified additional equipment, beyond the equipment identified in attachment 2, that will be functional while both cores are unloaded and all emergency diesel generators are out-of-service. This additional equipment will provide a higher degree of redundancy and/or diversity than required by the governing 10CFR50.59 evaluation.

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Revision of the items included in Attachments 2 and 3, and procedure TP-645, requires the review of the Plant Nuclear Safety Committee, and Plant Manager approval. Additionally, the following occurrences will be reported to the NRC Resident Inspector:

- a. Loss of all spent fuel pool cooling to a spent fuel pool and the subsequent heatup of the pool water to greater than the high temperature setpoint;
- b. Unavailability of two blackstart diesels to supply power to the spent fuel pool cooling system, and
- c. Loss of offsite power capability to the spent fuel pool cooling system.

When both units are defueled, FPL will commence implementation of the revised Technical Specifications, issued August 28, 1990, by Amendments 137 and 132 to Facility Operating Licenses DPR-31 and DPR-41. Those Technical Specifications that are required to be applicable "at all times" (identified in Attachment 1), including related portions of Technical Specification 1.0 "Definitions", 2.0 "Safety Limits and Limiting Safety System Settings", 5.0 "Design Features", and 6.0 "Administrative Controls", will be implemented and be in effect at that time. The remaining specifications, (those that are specific to modes 1 through 6), will be implemented prior to entry into mode 6 following defueled operation, but no later than August 28, 1991.

Should you have any questions regarding the information included in this letter, please contact us.

Yours truly,


K. N. Harris
Vice President
Turkey Point Nuclear

KNH/GS/cml

Attachments

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

DESCRIPTION OF ATTACHMENTS

- ATTACHMENT 1 TECHNICAL SPECIFICATIONS IN EFFECT WHILE BOTH
CORES ARE DEFUELED
- ATTACHMENT 2 EQUIPMENT THAT WILL BE FUNCTIONAL WHILE BOTH CORES
ARE UNLOADED AND ALL EMERGENCY GENERATORS ARE OUT
OF SERVICE
- ATTACHMENT 3 DESCRIPTION OF THE CONFIGURATION CONTROL PROGRAM
THAT WILL BE IN EFFECT WHILE BOTH CORES ARE
UNLOADED AND ALL EMERGENCY DIESEL GENERATORS ARE
OUT OF SERVICE
- ATTACHMENT 4 RESPONSES TO NRC QUESTIONS FROM JULY 17, 1990
STATUS MEETING ON THE EMERGENCY POWER SYSTEM
ENHANCEMENT DUAL UNIT OUTAGE

TECHNICAL SPECIFICATIONS IN EFFECT WHILE BOTH CORES ARE DEFUELED

<u>TECH. SPEC.</u>	<u>TITLE</u>
RTS 3/4.3.3.1	RADIATION MONITORING FOR PLANT OPERATIONS
RTS 3/4.3.3.3	ACCIDENT MONITORING INSTRUMENTATION (HIGH RANGE - NOBLE GAS EFFLUENT MONITORS - PLANT VENT STACK AND UNIT 3 FUEL PIT EXHAUST)
RTS 3/4.3.3.4	FIRE DETECTION INSTRUMENTATION
RTS 3/4.3.3.5	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION
RTS 3/4.3.3.6	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
RTS 3/4.4.7	REACTOR COOLANT SYSTEM CHEMISTRY
RTS 3/4.4.9.1	PRESSURE/TEMPERATURE LIMITS - REACTOR COOLANT SYSTEM
RTS 3/4.4.9.2	PRESSURE/TEMPERATURE LIMITS - PRESSURIZER
RTS 3/4.7.7	SEALED SOURCE CONTAMINATION
RTS 3/4.7.8.1	FIRE SUPPRESSION SYSTEMS - FIRE WATER SUPPLY AND DISTRIBUTION SYSTEMS
RTS 3/4.7.8.2	FIRE SUPPRESSION SYSTEMS - SPRAY AND/OR SPRINKLER SYSTEMS
RTS 3/4.7.8.3	FIRE SUPPRESSION SYSTEMS - FIRE HOSE STATIONS
RTS 3/4.7.8.4	FIRE SUPPRESSION SYSTEMS - FIRE HYDRANTS AND HYDRANT HOSE HOUSES
RTS 3/4.7.9	FIRE RATED ASSEMBLIES

TECHNICAL SPECIFICATIONS IN EFFECT WHILE BOTH CORES ARE DEFUELED

<u>TECH. SPEC.</u>	<u>TITLE</u>
RTS 3/4.9.7	CRANE TRAVEL - SPENT FUEL STORAGE AREAS
RTS 3/4.9.11	WATER LEVEL - STORAGE POOL
RTS 3/4.9.12	HANDLING OF SPENT FUEL CASK
RTS 3/4.9.14	SPENT FUEL STORAGE
RTS 3/4.11.1	LIQUID EFFLUENTS CONCENTRATION
RTS 3/4.11.2	GASEOUS EFFLUENTS DOSE RATE
RTS 3/4.11.3	SOLID RADIOACTIVE WASTES
RTS 3/4.11.4	TOTAL DOSE
RTS 3/4.12	RADIOLOGICAL ENVIRONMENTAL MONITORING

ATTACHMENT 2

ADDITIONAL EQUIPMENT THAT WILL BE FUNCTIONAL
WHILE BOTH CORES ARE UNLOADED AND
ALL EMERGENCY DIESEL GENERATORS ARE OUT OF SERVICE

ELECTRICAL POWER SOURCES

EQUIPMENT	REQUIREMENT
Startup Transformer Main Auxiliary Transformer	1 out of 2 functional per unit
"C" Bus Transformer	1 out of 2 functional for the site
4160 Volt "C" Bus Switchgear	1 out of 1 functional per unit
Blackstart Diesels	2 out of 5 functional for the site
Trailer Mounted Diesel	1 out of 1 functional for the site
Safety Related Train of 4160 Volt AC Power	1 out of 2 functional per unit
Safety Related Train of 480 Volt AC Power	1 out of 2 functional per unit
Safety Related Train of 120 Volt AC Power	2 out of 4 functional per unit
Safety Related Train of 125 Volt DC Power	1 out of 2 functional per unit

SPENT FUEL COOLING/SUPPORT SYSTEMS

EQUIPMENT	REQUIREMENTS
Intake Cooling Water Pumps	1 out of 3 functional per unit
Component Cooling Water Pumps	1 out of 3 functional per unit
Component Cooling Water Heat Exchangers	1 out of 3 functional per unit
Spent Fuel Cooling Pumps (100% flow)	1 out of 2 functional per unit
Backup Spent Fuel Cooling Pump (15% flow)	1 out of 1 functional per unit
Spent Fuel Cooling Heat Exchanger	1 out of 1 functional per unit
Diesel Fire Pump Screen Wash Pump	1 out of 2 functional for the site
Refueling Water Purification Pump Primary Water Pump Demineralized Water System Diesel Fire Pump	1 out 4 sources available per unit

OTHER PLANT EQUIPMENT REQUIREMENTS

EQUIPMENT	REQUIREMENTS
Control Room Ventilation/Isolation	functional while conducting fuel handling activities in SFP
Control Room Air Conditioning	1 out of 3 air conditioning units and 2 out of 3 air handling units functional
Spent Fuel Pool Building Ventilation System	1 out of 1 train per unit
Auxiliary Building Ventilation System	1 out of 2 trains while conducting fuel handling activities in the Unit 4 SFP
Fire Detection and Protection Equipment	Functional in new fuel and adjacent fire areas
Communications	As required by the FSAR Appendix 9.6A and the Emergency Plan

ATTACHMENT 3

DESCRIPTION OF THE CONFIGURATION CONTROL PROGRAM THAT WILL BE IN EFFECT WHILE BOTH CORES ARE UNLOADED AND ALL EMERGENCY DIESEL GENERATORS ARE OUT OF SERVICE

A Configuration Control Program is being developed for the period when both cores are defueled and the Emergency Diesel Generators are out of service. The program is implemented through plant procedure TP-645, "Defueled Operations Without Emergency Diesel Generators."

The procedure will cover outage operating limitations, applicable technical specifications, minimum equipment requirements, operating checklists, and log sheets to verify equipment availability. The plant clearance system will be used during the outage and updated system status drawings will be maintained in the control room. Planned configuration changes will be reviewed by the Plant Supervisor - Nuclear (PSN) and the Configuration Control Team, which includes members from the key plant departments.

The responsibilities of plant organizations/personnel will be as follows:

The Outage Management Organization is responsible for overall management of the dual unit outage, direction of pre-outage and outage activities, supervising the Configuration Control Team, and the performance of other activities in accordance with the current administrative procedure for outage management.

The Configuration Control Team is responsible for reviewing outage work to assure that the requirements of the Safety Evaluation are being maintained.

The Plant Supervisor - Nuclear (PSN) is responsible for minimum equipment configurations, informing shift personnel of plant configurations, control of plant switchyard activities, compliance with applicable Technical Specifications, performing plant procedures and surveillances to verify equipment operability/functionality, and verifying minimum shift complement in accordance with the Technical Specifications.

Plant System Engineering is responsible for implementing the System Engineer activities for the Dual Unit Outage, which include maintaining cognizance of activities occurring on specified plant systems, providing marked-up drawings to the Control Room, providing a written summary of testing and configuration changes to the PSN and Outage Shift Manager, providing advanced warning to the PSN of potential configuration conflicts, and maintaining the Control Room Configuration Control Book current.

Operations and other necessary plant personnel will be trained to the requirements of this procedure prior to the plant being in the defueled condition with both Emergency Diesel Generators out of service. Further, changes to the dual unit outage Configuration Control Program as implemented via this procedure require review by the Plant Nuclear Safety Committee and Plant Manager approval.

ATTACHMENT 4

RESPONSES TO NRC QUESTIONS FROM JULY 17, 1990 STATUS
MEETING ON THE EMERGENCY POWER SYSTEM ENHANCEMENT
DUAL UNIT OUTAGE

Question #1 What controls will be placed on work performed in the Switchyard?

Response #1 Switchyard access while all Emergency Diesel Generators are out of service will be conducted in accordance with plant procedure TP-651, "Control and Access of Turkey Point Switchyard." This procedure establishes controls for switchyard access, and the completion of an Access Form explaining reason for access and a detailed description of the work to be performed. The request for access is approved by the Plant Supervisor - Nuclear.

Question #2 Has a breaker coordination study been done regarding use of the blackstart diesels as backup power supplies to the nuclear units in the event of a loss of offsite power?

Response #2 A breaker coordination study is currently underway to verify the capabilities of the blackstart diesels to provide back up power to the C buses on the nuclear units in the event of a loss of offsite power. This work will be completed prior to removing the Emergency Diesel Generators from service.

Question #3 What will the operational staffing levels be during the dual unit outage?

Response #3 Operational staffing levels during the dual unit outage will be maintained in accordance with the Technical Specifications (Revised Technical Specifications Table 6.2-1)

Question #4

What is the makeup of the configuration control team?

Response #4

The configuration control team is comprised of key plant departmental representatives from operations, engineering, construction, technical staff, procedures, training, security, system protection, transmission and distribution, and licensing, and is headed by outage management. Additionally, the team will be relying heavily on the plant system engineers to review the planned system configurations and, along with operations, verifying the system configurations in the field.

Question #5

What standards or criteria is FPL using in the design and construction of the modifications?

Response #5

The design standards and criteria for the Emergency Power Enhancement are discussed in detail in our response to NRC Questions 1 and 2 in our June 4, 1990 submittal (FPL letter number L-90-196)

