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ACCESSION NBR: 9101030140 DOC. DATE: 90/12/27 NOTARIZED: NO DOCKET #
 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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RECIP. NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Requests NRC approval for change to emergency action level table in EPIP 20101, "Duties of Emergency Coordinator," to permit use of table w/Category 12 to more closely match sys configurations during extended outage.

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L-90-368
10 CFR 50.54 (q)
10 CFR 50.4

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
10 CFR 50.54(q) Change to the Emergency Plan

In accordance with the provisions of 10 CFR 50.54(q), Florida Power and Light (FPL) requests NRC approval for a change to the Emergency Action Level table in Emergency Plan Implementing Procedure 20101, "Duties of Emergency Coordinator." This procedure change was discussed with NRC staff personnel on December 10, 1990, at which time the NRC asked for this formal request to be forwarded.

Beginning approximately December 29, 1990, both Unit 3 and Unit 4 will be fully defueled in order to upgrade the emergency power systems (EPS). A procedure change is necessary to permit the use of an Emergency Action Level (EAL) table with a Category 12 that more closely matches the system configurations of Turkey Point during this extended outage and still meet the intent of 10 CFR 50.47(b)(4).

During the design implementation period, both emergency diesels will be disabled in accordance with FPL's design implementation requirements. Because of this, the table will not include a specific action level for the loss of the emergency diesels as outlined in the guidance of Appendix A of NUREG 0654. A procedure change to EPIP 20101 EAL table Category 12 will be issued for use during the EPS project. Category 12 part 2 (b), now based on the loss of emergency diesels, will be changed to require the declaration of an Unusual Event upon the loss of all power to the spent fuel pool cooling system and a subsequent heatup of the spent fuel pool to a temperature in excess of 130 degrees F. After fuel off load into the spent fuel pools, the ambient temperature in the pools is expected to level off at just below 120 degrees F. The Turkey Point Spent Fuel Pools are analyzed and licensed to function with a boiling pool with makeup water supplied. Category 12 part 2(b) of EPIP 20101 EALs will be restored to its present form prior to entering mode 6 (refueling) after the completion of the EPS enhancement project.

This procedure change does not present an undue risk to the public health and safety. The FPL 10 CFR 50.59 evaluation of the interim system configurations and Temporary Procedure TP-645, "Defueled Operations," require additional systems and equipment to be functional during the outage. The redundancy and/or diversity provided by the additional systems (not required by Technical Specifications), will provide additional assurance that no safety concern exists.

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The Emergency Classification Table, and its use, was discussed with local county Emergency Preparedness personnel prior to the beginning of the EPS enhancement outage.

Should there be any questions, please contact us.

Very truly yours,



T. F. Plunkett
Vice President
Turkey Point Plant Nuclear

TFP/JEK/jk

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