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SUBJECT: Provides response to addl info re NRC Generic Ltr 87-02,
 "Verification of Seismic Adequacy of Mechanical Unresolved
 Safety Issue A-46."

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

Subject: St. Lucie Unit 1
Docket No. 50-335
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Verification of Seismic Adequacy of Mechanical
and Electrical Equipment in Operating Reactors
Unresolved Safety Issue (USI) A-46
Generic Letter (GL) 87-02

Re: NRC Letter, Jan A. Norris and L. Raghavan to
Florida Power & Light Company, "Summary of a
Meeting Between FPL and NRC Staff", dated
March 18, 1992.

The purpose of this letter is to provide Florida Power and Light Company's (FPL) schedule for responding to the request for additional information concerning the site specific seismic review program that FPL implemented. FPL will provide the response to the additional information requested in the referenced letter by August 31, 1992. The responses will be based on FPL's site specific program and on the equipment list previously submitted. The walkdowns focused on anchorage reviews, above ground steel tank reviews and seismic interactions reviews for the equipment used.

On February 19, 1987, the NRC issued Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue A-46." This Generic Letter requested that certain licensees verify the seismic adequacy of equipment needed to achieve safe shutdown using seismic criteria not in use when the plants were licensed. FPL letter L-87-217, dated May 15, 1987, (C.O. Woody to U.S. Nuclear Regulatory Commission), responded to the request in GL 87-02 and stated that the concerns raised by GL 87-02 do not apply to FPL sites. FPL letter L-87-401, dated October 1, 1987 (C.O. Woody to U.S. Nuclear Regulatory Commission), provided the supporting information to justify FPL's position that there is inherent safety margin already incorporated into the

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design bases for the St. Lucie and Turkey Point plants due to the geology of Florida which is responsible for low seismic ground motion and the low risk of an earthquake occurring.

On June 2, 1988, FPL met with the Staff to discuss the FPL site specific value/impact analysis. NRC letter dated June 15, 1988 (Gordon E. Edison and E.G. Tourigny to FPL), provided the meeting minutes, which gave FPL a choice of either developing a "scaled-back program" or raising the request for exemption to higher NRC management. The bases for the "scaled back program" option were "...acknowledging the low seismicity of the southern Florida area" and the value/impact analysis that was presented by FPL at the June 2 meeting.

FPL letter, L-88-333, dated August 4, 1988 (W.F. Conway to U.S. Nuclear Regulatory Commission), transmitted FPL's site specific program, its bases documents, the site specific hazard curves and the value/impact analysis. This program incorporated the request to address anchorage issues in a "lesser scope" program made by the Staff during the June 2, 1988 meeting.

On August 4, 1989 (Gordon E. Edison and Jan A. Norris to C.O. Woody), the NRC provided FPL with the results of its review of FPL's site specific seismic review program. The Staff concluded that the program would be acceptable if FPL incorporated six items into the program for pre-walkdown activities and two items for post walkdown activities.

On December 13, 1989 (J.H. Goldberg to U.S. Nuclear Regulatory Commission), FPL provided the revised seismic review program which incorporated five of the six pre-walkdown items and both of the post walkdown items. The one item that FPL did not include in the revised seismic review program was a relay evaluation. The bases for excluding the relay evaluation were 1) relays are not a safety concern based on industry experience especially for low seismic risk areas, 2) FPL takes credit for operator actions to reset any tripped relays and 3) the results of the value/impact analysis constraints. FPL requested a review and acceptance of the program prior to the walkdowns that were scheduled to begin in the 1990 spring refueling outages for St. Lucie Unit 1 and Turkey Point Units 3 and 4.

The equipment walkdowns were completed, as scheduled, for St. Lucie Unit 1 and Turkey Point Units 3 and 4 in the spring of 1990. Equipment was verified to meet the original design bases and as such, no operability concerns were identified. The Seismic Review Team did note several seismic enhancements which would economically harden the plant against damage should an earthquake occur. St. Lucie Unit 1 has completed the identified enhancements. The enhancements at Turkey Point Units 3 and 4 are in process. These seismic enhancements provide a greater margin of safety against damaging earthquakes than was previously available.

Should there be any questions concerning this matter, please contact us.

Very truly yours,



W.H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/RG/vmg

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