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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
 AUTH. NAME: BOHLKE, W. H. AUTHDR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Describes seismic program to comply w/Suppl 4 to GL 88-20,
 "IPEEE for Severe Accident Vulnerabilities," per NRC 920625
 ltr. Implementation for both policy statement on severe
 accidents & USI A-46 employ similar methodologies.

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NOTES: NRR RAGHAVAN, L 05000250
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FPL

AUG 31 1992

L-92-222
10 CFR 50.54(f)

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

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
St. Lucie Units 1 and 2
Individual Plant Examination of
External Events (IPEEE) for
Severe Accident Vulnerabilities
Generic Letter (GL) No. 88-20, Supplement 4

Gentlemen:

GL 88-20, Supplement 4, issued on June 28, 1991 requested that licensees submit a description of their proposed program for completing an IPEEE to identify vulnerabilities to severe accidents. Florida Power and Light Company (FPL), by letter L-91-336 dated December 23, 1991, provided IPEEE Program Plans for St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4. In letter L-91-336, FPL proposed alternative methods to those described in GL 88-20, Supplement 4 and in NUREG 1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities", to satisfy the intent of the IPEEE for seismic events.

By NRC letter dated June 25, 1992, the NRC stated that the methods proposed by FPL to satisfy the intent of the IPEEE are acceptable with the exception of seismic events. By letter L-91-336, dated December 23, 1991 FPL proposed using the results of the proprietary FPL site-specific Seismic Program associated with Unresolved Safety Issue (USI) A-46 (Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors") to resolve the seismic aspects of GL 88-20. The NRC's June 25, 1992 letter stated that a determination on the acceptability of the FPL Seismic Program could not be made since specific information on the program had not been provided in FPL's December 23, 1991 response. The staff requested that FPL submit a description of the program.

FPL's Seismic Program was submitted to the NRC on August 4, 1988 (FPL Letter L-88-333) and later revised in response to NRC comments, on December 13, 1989 (FPL Letter L-89-441).

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FPL is resolving the outstanding issues regarding this program with the NRC. Attachment 1 compares the program elements requested by GL 88-20, Supplement 4/NUREG-1407 with the elements in FPL's Seismic Program. By letter dated August 17, 1989, from Gordon E. Edison and Jan A. Norris to C. O. Woody, the NRC accepted FPL's Seismic Program as proprietary under 10 CFR 2.790. Since Attachment 1 describes the FPL Seismic Program, we request that it also be withheld from public disclosure in accordance with 10 CFR 2.790. An affidavit supporting this request is attached.

In the NRC's June 25, 1992 letter, the staff commented that the purpose of the IPEEE is different than that of USI A-46 and that the scope of the IPEEE is broader than that of USI A-46. FPL's position on these subjects follows.

The purpose of the IPEEE is to implement the Policy Statement on Severe Accidents. The Policy Statement, in turn, has as its purpose, reduction in the risk of occurrence of a severe accident involving substantial damage to the reactor core if cost effective modifications can be made to reduce the risk. IPEEE/GL 88-20 Supplement 4 (for Reduced Scope Plants) allows licensees to demonstrate that a seismically adequate equipment path exists to safely shut down the reactor if there is an earthquake at the Safe Shutdown Earthquake (SSE) level.

The purpose of USI A-46 is to verify the seismic adequacy of mechanical and electrical equipment in older plants at the SSE level to design criteria not in use when the plants were originally licensed. The equipment in a path which can be used for safe shutdown must be chosen and specified. GL 87-02 implements USI A-46 by allowing licenses to demonstrate that such an equipment path exists using equipment verified to be seismically adequate.

While the stated purposes of the Policy Statement on Severe Accidents and USI A-46 are different, the implementation methodology (for Reduced Scope Plants) is the same, i.e., to verify that an equipment path exists, using seismically adequate equipment, to safely shut down the reactor if there is an earthquake at the SSE level.

If evaluations are made using a review level earthquake (RLE) above the SSE, the scope of the IPEEE can be broader than for USI A-46 because non-design basis accidents are to be considered. These include seismically induced loss of coolant accidents (LOCAs), fires, floods, high energy line breaks (HELBs) and mitigating systems to address these seismically induced accidents.

L-92-222
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Since the RLE is equal to the SSE for Reduced Scope Plants, (GL 88-20, Supplement 4, Appendix 3) these non-design basis accidents do not need to be addressed, nor does the adequacy of Seismic Category I piping systems and structures and components need to be addressed.

On the basis of the above, it is FPL's position that the FPL Seismic Program adequately meets both the IPEEE and USI A-46 generic letters. FPL has conducted a search for vulnerabilities, in the context of GL 88-20 Supplement 4 at Turkey Point Units 3 and 4 and St. Lucie Unit 1 by implementing the FPL Seismic Program and will do so for St. Lucie Unit 2 in September 1992.

Very truly yours,



W. H. Bohlke
Vice President
Nuclear Engineering
and Licensing

WHB/rcs

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

W. H. Bohlke being first duly sworn, deposes and says:

That he is Vice President, Nuclear Engineering and Licensing of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



W. H. Bohlke

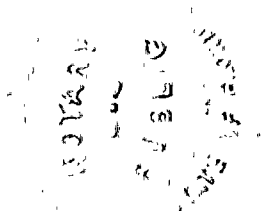
Subscribed and sworn to before me this

31 day of August, 1992.

Susan M. Fey Susan M. Fey

NOTARY PUBLIC, in order and for the County of Palm Beach, State of Florida

My Commission expires _____
Notary Public, State of Florida
My Comm. Exp. Feb. 18, 1995
Bonded thru PICHARD Ins. Agency
Comm. No. 084807



AFFIDAVIT

State of Florida
County of Palm Beach


W. H. Bohlke being first duly sworn, deposes and says the following:

1. I am the Vice President Nuclear Engineering and Licensing of Florida Power and Light (FPL) Company, the Licensee herein.
2. Attachment 1 submitted with letter L-92-222 describes details of FPL's Seismic Program. By letter dated August 17, 1989 to FPL from the NRC's St. Lucie and Turkey Point Project Managers, this program was accepted as proprietary to be withheld from public disclosure per 10CFR2.790 and accordingly Attachment 1 is to be withheld from public disclosure per 10CFR2.790.
3. The statements made in this affidavit are true and correct to the best of my knowledge, information, and belief.
4. I am authorized to execute this affidavit on behalf of the said Licensee



W. H. Bohlke

Subscribed and sworn to before me this 31 day of August 1992.


Notary Public, In and for the
County of Palm Beach,
State of Florida

My Commission expires: _____

Notary Public, State of Florida
My Comm. Exp. Feb. 18, 1995
Bonded thru PICHARD Ins. Agency

Comm. No. 084807



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ATTACHMENT 1

THIS ATTACHMENT IS SUBMITTED AS PROPRIETARY UNDER THE PROVISIONS 10-CFR 2.790

COMPARISON OF CRITERIA CONTAINED IN GENERIC LETTER (GL) 88-20 SUPPLEMENT 4/NUREG-1407 WITH FPL (PROPRIETARY) SITE SPECIFIC SEISMIC ISSUE RESOLUTION PROGRAM (FPL SEISMIC PROGRAM)

ITEM	GENERIC LETTER (GL) 88-20 SUPPLEMENT 4/NUREG-1407	FPL SEISMIC PROGRAM	PROPOSED MODIFICATIONS TO FPL SEISMIC PROGRAM TO ADDRESS GL 88-20 SUPPLEMENT 4/NUREG-1407
A Operational Criteria			
1 Equipment to Achieve and Maintain Hot Shutdown			
a) Instruments & Control b) Chemical & Volume Control c) Heat Removal Capability d) Electrical Power Supply	The GL & NUREG Do Not Contain Any Specific Equipment Lists But They: 1) Refer to the Objective of Achieving & Maintaining Hot Shutdown 2) Refer to the Objective of Addressing Reactor Subcriticality 3) Refer to the Objective of Addressing Early Emergency Core Cooling	The FPL Seismic Program Contains Specific Equipment Lists for Equipment to Achieve & Maintain Hot Shutdown per Items a) through d) inclusive and to address reactor subcriticality and early emergency core cooling.	1) None - See Discussion Below a) FPLs Seismic Program also Assumes Loss of Off Site Power Due to the Seismic event & the Resulting Need to use the Plant Emergency Power Systems. b) The GL & NUREG do not Specify Loss of Off Site Power. c) FPL Considers its Program to be More Conservative and an enhancement to the GL and NUREG.
2 Initial Plant Status	Full Power Operating Conditions	Same	1) None
3 Maximum Maintenance of Hot Shutdown	72 Hours	8 Hours	1) None - See Discussion Below a) FPLs Programs to Implement the Station Blackout Rule Provide for no more than 8 Hours at Hot Shutdown & have been Accepted by NRC/SER. b) 8 Hours is Consistent with FPLs Plant Technical Specifications.
4 Consideration of Non-Design Basis Accidents	Not Requested for Reduced Scope Plants	None	1) None - See Discussing Below a) Reduced Scope Plants do not have to consider seismically induced LOCAs, fires, floods, HELBS and mitigating systems.
5 Consideration of Failures	1) Passive Mechanical and NSSS 2) Non-Seismic 3) Human	None	1) None - See Discussion Below a) Cannot be justified due to technical and economic considerations.

ITEM	GENERIC LETTER (GL) 88-20 SUPPLEMENT 4/NUREG-1407	FPL SEISMIC PROGRAM	PROPOSED MODIFICATIONSTO FPL SEISMIC PROGRAM TO ADDRESS GL 88-20 SUPPLEMENT 4/NUREG-1407
B Programmatic Criteria			
1 Licensee Staff Participation	Requested	Included	1) None
2 Perform Pre-Walk Down Investigations	Requested	Included	1) None
3 Provide a Success Path For Equipment	Requested	Included	1) None
4 Provide an Alternative Success Path for Equipment	Requested	Not Included	1) None - See DiscussionBelow a) FPLs Seismic Program Provides that Concerns Related to Equipment in the Success Path will be Checked in the Other Train of Equipment.
5 Outliers	Requested to be Evaluated Per SQUG/GIP Procedures	Evaluated Per Normal Plant Procedures Addressing Potentially Non-Conforming Conditions	1) None - See DiscussionBelow a) FPL is not a Member of SQUG & does not have Access to the (Proprietary) GIP Procedures. b) FPL Staff have been Trained to Use Normal Plant Procedures & an Infrastructure is in Place to Process Potentially Nonconforming Conditions up to & Including Reporting to the NRC If Required.
6 Peer Review	Requested	Included	1) None

ITEM	GENERIC LETTER (GL) 88-20 SUPPLEMENT 4/NUREG-1407	FPL SEISMIC PROGRAM	PROPOSED MODIFICATIONSTO FPL SEISMIC PROGRAM TO ADDRESS GL 88-20 SUPPLEMENT 4/NUREG-1407
C Technical Criteria			
1 Seismic Input	Safe Shutdown Earthquake (SSE) Ground Response Spectra & In- Structure Spectra	Same	1) None
2 Wrench Tightness Checks For Anchor Bolts	Not Requested	Not Included	1) None
3 Relay Chatter Evaluation	Not Requested	Not Included	1) None
4 Soils Review	Not Requested	Not Included	1) None
5 Equipment Fragilities	Requested to be Evaluated Per SQUG/GIP Procedures	Evaluated Per SSRAP Bounding Spectra Procedures	1) None - See Discussion Below a) FPL is not a Member of SQUG & Does Not Have Access to the (Proprietary) GIP Procedures b) The SSRAP Bounding Procedures are in the Public Domain c) SSRAP Provided Oversight & Peer Review of the GIP d) SSRAP had NRC Membership
6 Containment & Containment Systems Review	Not Requested	Not Included	1) None
D Documentation Criteria			
1 Walkdown Documentation Format Per EPRI NP-6041	Format for "Reduced Scope Plants"	Included	1) None
E Other Issue Resolution Criteria			
1 Seismic Adequacy of Decay Heat Removal Equipment (USI A-45)	Requested	Included (See Item A.1.c.)	1) None
2 Seismic Spatial Systems Interactions (USI A-17)	Requested (Piping/Tubing/ Structures)	Included	1) None
3 Seismic Design Criteria For Large Tanks (USI A-40)	Not Requested	Included	1) This Item Only Included at Turkey Point Units 3 & 4, & St. Lucie Unit 1. 2) St. Lucie Unit 2 is Exempted Per NUREG - 1233 (September 1989)
4 Seismic Interaction of Westinghouse In-Core Flux Mapping System Components	Requested	Not Included	1) This Issue will be Included in the Resolution of GL 88-20 as a Separate Item from the FPL Seismic Program.

