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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 PLUNKETT, T.F. AUTHOR AFFILIATION Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC Bulletin 93-002, "Debris Plugging of ECC Suction Strainers." Requested actions performed & procedures GOP-503, GOP-301 & 0-SMM-051.3 to control mats provided.

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FPL

P.O. Box 029100, Miami, FL, 33102-9100

JUN 08 1993

L-93-140
10CFR50.54 (f)

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
NRC Bulletin 93-02
Debris Plugging of Emergency Core Cooling Suction Strainers

NRC Bulletin 93-02, issued May 11, 1993, requested that licensees take appropriate compensatory measures and corrective actions for fibrous air filters or other temporary sources of fibrous material, not designed to withstand a LOCA, which are installed or stored in containment. In accordance with the bulletin, Florida Power and Light Company provides the attached response relative to the Turkey Point Nuclear.

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

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/CLM/cm

Attachment

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

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PDR ADDCK 05000250
Q PDR

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STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Nuclear, of Florida Power and 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.

T. F. Plunkett
T. F. Plunkett

Subscribed and sworn to before me this

8th day of June, 1993.

Gillian Dale Herbenick
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of
Dade, State of Florida

My Commission expires
Commission No. _____



T. F. Plunkett is personally known to me.

ATTACHMENT

**FLORIDA POWER AND LIGHT
TURKEY POINT UNITS 3 AND 4**

NRC BULLETIN 93-02

Debris Plugging of Emergency Core Cooling Suction Strainers

Florida Power and Light Company (FPL) provides the following information relative to Turkey Point Units 3 and 4 in response to NRC Bulletin 93-02:

Requested Action

Identify fibrous air filters or other temporary sources of fibrous material, not designed to withstand a LOCA, which are installed or stored in your primary containment. Take any immediate compensatory measures which may be required to assure the functional capability of the ECCS. Take prompt action to remove any such material. Because of the low probability of a LOCA event, the staff considers removal of this material at the next shutdown, or within 120 days, whichever comes first, to be sufficiently prompt. If the facility is currently in a shutdown, you are requested to remove such material prior to restart.

FPL Response

Air filters normally installed in Turkey Point's containments are designed to withstand a LOCA, without being washed into the containment recirculation sump. One temporary source of fibrous material has been stored in containment while the unit is operating. High efficiency particulate (HEPA) filters are used during outages when the primary manways to the steam generators are open; these filters are very heavy, and have been stored in containment during operation. The filter elements have now been removed from both containments, and affected procedures have been revised to ensure that these filter elements are removed as part of the normal containment closeout process.

Other temporary sources of fibrous material include rags, wood (for instance, scaffolding), and temporary filters (sometimes attached to the inlet of the containment coolers). All such materials are removed from containment in accordance with procedure 0-SMM-051.3, Containment Closeout Inspection. Two Quality Control Holdpoints are imposed, one to ensure that the closeout inspection is completed prior to establishing containment integrity, and one to ensure that all material not permanently installed is removed or stored properly prior to entering Mode 2.

General Operating Procedure GOP-503 directs the restart of the plant from Mode 5 up to Mode 3. GOP-503 requires the performance of the Containment Closeout Inspection (directed by 0-SMM-051.3) as a prerequisite. GOP-301 directs the restart of the plant from Mode 3 up to Mode 1. GOP-301 requires the completion of 0-SMM-051.3 as a prerequisite, meaning that all loose material identified during the closeout inspection must be either removed or stored properly.

Step 6.3.1 of 0-SMM-051.3 requires that "all items have been removed from containment that could be washed to the containment recirculation sumps" Only those items "deemed incapable of being washed into the recirculation sump," are allowed to be stored inside containment, and proper storage is defined in step 6.3.5.

Step 6.3.8 of 0-SMM-051.3 requires verification that "no temporary filter medium is attached to the inlet of the containment coolers." This step has been enhanced to ensure removal of any such temporary filter media from containment, and step 6.3.9 has been added to ensure removal of the HEPA filter elements discussed above.

Reporting Requirements

1. Within 30 days of the date of the bulletin, a written response stating whether the actions requested above have been or will be performed. If the use of such material is identified, this written response shall also include the locations and quantity of use, any immediate compensatory measures taken, and the current schedule for removal of the material.
2. Within 30 days of completion of the requested actions, a report confirming completion.
3. If an addressee proposes not to take the actions requested in this bulletin, provide to the NRC staff, within 30 days of the date of this bulletin, your proposed alternative course of action and a justification for any deviations from the requested actions.

FPL Response

The actions requested have been performed. No additional temporary sources of fibrous material have been identified. Procedures GOP-503, GOP-301, and 0-SMM-051.3 provide adequate controls of such material.





FPL

Inter-Office Correspondence

To: E. J. Weinkam Location: Turkey Point Nuclear
From: Quality Assurance Date: 6-3-93
Subject: Independent Verification per QI 18 QAD 10 Requirements Copies: IV File

As requested by Regulation and Compliance, we have performed a commitment verification of completed corrective action statements contained in the subject document. These specific statements were selected for verification based upon their specificity and vulnerability to direct challenge. These statements are indicated in the attached "marked-up" text.

Document Reviewed: L-93-140
Debris Plugging of ECCCS Stopped

- 1) Number of statements reviewed: 3
- 2) Statements acceptable as written based on objective evidence? (Y/N)
- 3) If statement(s) not acceptable, explain: _____
- 4) Other comments (if applicable) _____

The detailed results of our review were conveyed to the cognizant Regulation and Compliance Engineer. A complete file of verification results is available in our office.

[Signature]
Quality Assurance Engineer

/law

Attachment

APPROVED:

[Signature]
C. V. Rossi
Supervisor - QA
Regulatory Performance