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

SUBJECT: Forwards response to NRC 930512 telcon request for addl info re 920225 application for amends to Licenses DPR-31 & DPR-41 covering OL expiration date.EPRI cleanliness control requirements incorporated into quality instructions.

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FPL

JUL 13 1993

L-93-159
10 CFR 50.90

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
Request for Additional Information (RAI) -
Proposed License Amendments
Operating License Expiration Date

By letter L-92-31, dated February 25, 1992, Florida Power and Light Company (FPL) submitted a request to amend Turkey Point Units 3 and 4 Technical Specifications. In a conference call between the NRC and FPL on May 12, 1993, the staff requested additional information to support the technical review of the proposed license amendments. The response to these NRC questions is enclosed.

Should there be any questions, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

Enclosure

TFP/RJT/rt

cc: S. D. Ebneter, Regional Administrator, Region II, USNRC
R. C. Butcher, Senior Resident Inspector, USNRC, Turkey Point
W. A. Passetti, Florida Department of Health and Rehabilitative Services

A001
1/1

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 Plant, 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

Subscribed and sworn to before me this
13th day of July, 1993.

Julia F Wingate
Julia F. Wingate
Name of Notary Public (Type or Print)

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

My Commission expires September 22, 1995
Commission No. 145106

T. F. Plunkett is personally known to me.

OFFICIAL NOTARY SEAL
JULIA F. WINGATE
MY COMMISSION NUMBER
CC 145106
MY COMMISSION EXPIRES
SEPTEMBER 22, 1995

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNITS 3 AND 4

RESPONSE TO NRC QUESTIONS

ON THE

PROPOSED LICENSE AMENDMENTS:
OPERATING LICENSE EXPIRATION DATE

RESPONSE TO NRC QUESTIONS

In a conference call between the NRC and FPL on May 12, 1993, the staff requested additional information to support the technical review of the proposed license amendments. The response to these NRC questions is enclosed.

Question:

Provide a description of the As Low As Reasonably Achievable (ALARA) Program and initiatives in place to insure radiation dose rates are kept to a minimum. The response should include details regarding the following areas: (a) Cobalt Reduction Program; (b) Zone coordinators; (c) Robotics; (d) Future dose goals; (e) Dose reduction features that have been implemented; and (e) use of ultra-fine filters.

Response:

Turkey Point has an aggressive ALARA program which has been very effective in reducing plant radiation exposure. This program will continue to be aggressive in the future in order to keep radiation exposures As Low As Reasonably Achievable.

Some of the major initiatives in place are listed below and will be used to assure that our future exposure goals of 275 man-rem for a single outage year and 475 man-rem for a dual outage year are realized. The dose reduction features that have been implemented are as follows:

ALARA ZONE COORDINATORS

One of the most effective ALARA tools we have employed over the last five years is the use of ALARA Field Coordinators during scheduled outages. The duties of these personnel are listed below:

1. Observe daily work in the field and document observations with regard to:

   a. Work in progress,
   b. Unnecessary exposure,
   c. Unplanned work,
   d. Rework, and
   e. Suggestions for work improvement.

2. Review daily exposures - actual versus estimated on all Radiation Work Permits (RWP's).

3. Assist in conducting pre-job briefings.

4. Observe, assist and approve mock-up briefings.

5. Perform post-job ALARA reviews.

6. Develop ideas/methods to accomplish work while expending less exposure.

The results of the Zone Coordinator's observations have been incorporated into the operating and maintenance procedures. Since 1991, Health Physics has reviewed and provided input into approximately 140 plant procedures. The majority of these changes have come from data received and improvements recommended by the ALARA Zone Coordinators. The use of the zone coordinators has helped FPL identify where we were expending unnecessary exposure. As a result, the man-rem estimates for a "standard" refueling outage are more accurate and our exposure totals much lower.

ROBOTICS

Turkey Point has employed the use of mechanized tooling (robotics) and remote tooling effectively during recent years and will continue to do so in the future. The most significant exposure savings has come from the use of automatic eddy current testing equipment. Over the past three refueling outages, Turkey Point has tested 100% (nominal) of the tubes in the steam generators and received on an average approximately 12 man-rem while accomplishing this task. We have also successfully used remote tooling for radwaste handling, remote welding operations (conoseals and RTD welding) and underwater vacuuming operations.

CLEANLINESS CONTROL

EPRI cleanliness control requirements are incorporated into Quality Instructions at FPL nuclear sites. As a standard work practice FPL includes cleanliness control in Plant Work Orders (PWOs). Quality Instruction QI-2-PTN-3, Fluid Systems Cleanliness, required controls in maintenance procedures and packages. These controls will result in reduced cobalt in the reactor coolant system.

TEMPORARY SHIELDING

The process of obtaining authorization to use temporary shielding in safety related areas has been streamlined. Previously, a 10 CFR 50.59 evaluation and stress analysis was performed for each temporary shielding installation. Turkey Point now has a Temporary Shielding Specification (SPEC-C-003) which simplifies the authorization for the use of temporary shielding. The process now takes 1 to 2 days to receive an authorization compared to 2 or more days previously and incorporates all engineering and regulatory requirements. The Temporary Shielding Specification has resulted in a more effective use of shielding.

CONTAINMENT COATING UPGRADES

During the Turkey Point 1991 dual unit outage FPL began re-painting both containment buildings. This effort has resulted in easier and faster area decontamination which in turn will reduce exposures during future outages. The program to upgrade the coatings in the entire plant is still in progress with the majority of the auxiliary building complete.

COBALT SOURCE REDUCTION PROGRAM

The goal of ALARA is to provide low cobalt valves "on the shelf" for use when normal requirements force the changeout of a component.

The Cobalt Source Reduction Manual was completed in January 1993. The purpose of this program is to minimize the source of cobalt and mitigate the effects of cobalt that remains in the system. To date, a cobalt free replacement valve for MOV-3-866A has been purchased and approved for installation.

Identification of valves containing stellite has been completed and is included in the Cobalt Source Reduction Manual.

If a listed component is being replaced, FPL will ask the vendor if a non-cobalt hard faced unit is available. If the non-cobalt component is available, then consideration will be given to ordering this component. If a non-cobalt component is not available, then FPL will determine if an acceptable alternative method is available.

INCREASE FILTRATION (REDUCE PARTICLE SIZE RETENTION SPECIFICATION) OF CVCS FILTERS

Turkey Point is presently considering increasing CVCS filtration. FPL is comparing the possible dose reduction versus increased cost and dose from shortened filter change-out cycles.

There are concerns that increasing filtration would increase the frequency of filter changeout thus increasing the solid waste inventory. This cost must be weighed against the possible dose savings brought about by the reduction in radioactive "CRUD" products.

Turkey Point is currently using sub-micron filters in the refueling cavity water during refueling outages. These filters have been effective in improving water clarity and post "drain down" contamination levels as well as ensuring that a significant amount of primary coolant has been filtered.

SUMMARY

FPL observed a dose reduction during the Turkey Point Units 3 and 4 1991 dual unit outage as a result of the implementation of these dose reduction features. During this outage, the Resistance Temperature Devices (RTD) bypass manifolds were successfully removed. Total dose received was approximately 130 man-rem, among the lowest in the industry to-date. Radiation levels inside the bio-wall in the vicinity of the RTDs have been reduced approximately two-fold. Estimated man-rem savings for subsequent refueling outages is approximately 50 man-rem per outage.

The past refueling outages for Turkey Point Units 3 and 4 were performed with total exposures of 212 and 194 man-rem, respectively. In addition, the site man-rem total of 325 for 1992 was the lowest total since Turkey Point began dual unit operation. These exposure values indicate FPL trends towards reducing the dose limit at Turkey Point to as low as reasonably achievable.