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SUBJECT: Supplements util response to USI A-46 re anchorage of  
 CST & RWST at plant.

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**FPL**

**JUN 20 1996**

**L-96-164**

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-001

Subject: Turkey Point Plant Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Generic Letter 87-02, USI A-46  
Tank Anchorage

Florida Power and Light (FPL) Letter No. L-93-155, dated July 15, 1993, transmitted "Final Report of Plant Specific Seismic Adequacy Evaluation of Turkey Point Units 3 and 4 to Resolve Unresolved Safety Issue (USI) A-46 and Generic Letter (GL) 87-02." The purpose of this letter is to supplement FPL's response to USI A-46 regarding anchorage of the Condensate Storage Tanks (CST's) and Refueling Water Storage Tanks (RWST's) at the Turkey Point Plant.

Using the beyond design basis criteria in USI A-40 and USI A-46, calculations initially performed for the CST's (Items 12 and 13 in the above report) and the RWST's (Items 14 and 15 in the above report) indicated a limiting High Confidence Low Probability Failure (HCLPF) seismic capacity of the tanks of .11g which was less than the Maximum Hypothetical Earthquake (MHE) value for Turkey Point of .15g. As a result, these tanks were considered "outliers" in the above report.

During an NRC audit and site inspection performed at the Turkey Point Plant site on December 4 through 8, 1995, FPL agreed to provide further calculations regarding these tank anchorages. Accordingly, additional calculations were completed on December 17, 1995, indicating limiting HCLPF seismic capacities of .21g and .20g for the CST's and RWST's, respectively. However, the methodology used in these more recent calculations was different than that used originally, and questions were raised by the NRC regarding the appropriateness of certain assumptions and methods used in the analysis. As a result, refined analyses were performed using the methodology presented in the "British Paper" by Holmes and Martin as a basis, which is consistent with the original calculations in the April 30, 1993, report. The calculations conservatively determine the anchorage capacities based on the different anchorage failure modes (bond strength, bearing stress, shear cone failure, and bar strength). The lowest capacities with corresponding failure mode assumptions were then utilized in the HCLPF calculations. Based on these calculations the limiting HCLPF seismic capacities for the CST's and RWST's were determined to be .153g and .152g, respectively. Thus, the seismic capacities of the CST's and RWST's for Turkey Point Units 3 and 4 meet the design basis seismic acceleration requirement of .15g ground acceleration for the MHE, and it is FPL's position that these tanks are no longer "outliers" with regard to USI A-46.

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Should you have any questions regarding this response, please contact me.

Very truly yours,

  
for W. H. Bohlke  
Vice President  
Nuclear Engineering and Licensing

WHB/spt

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