

# CATEGORY 1

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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  
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HOVEY,R.J. Florida Power & Light Co.  
RECIP.NAME RECIPIENT AFFILIATION  
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SUBJECT: Provides rev to 120-day response to GL 96-06, "Assurance of Equipment Operability & Containment Integrity During Design-Basis Accident Conditions."

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L-97-086  
10 CFR 50.54(f)

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

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 251  
NRC Generic Letter 96-06  
ASSURANCE OF EQUIPMENT OPERABILITY  
AND CONTAINMENT INTEGRITY  
DURING DESIGN BASIS ACCIDENT CONDITIONS

This letter provides a revision to the Florida Power & Light Company (FPL) 120-day response, L-97-021 dated January 28, 1997, to NRC Generic Letter (GL) 96-06, "ASSURANCE OF EQUIPMENT OPERABILITY AND CONTAINMENT INTEGRITY DURING DESIGN BASIS ACCIDENT CONDITIONS." The GL requested that within 120 days of September 30, 1996, FPL submit a written summary report stating the actions taken in response to the GL, the conclusions that were reached relative to susceptibility for waterhammer and two-phase flow in the containment air cooler cooling water system and overpressurization of piping that penetrated containment, the basis for continued operability, and the corrective actions implemented or planned to be implemented. The purpose of this letter is to provide a revision to FPL's corrective actions.

In response L-97-021, dated January 28, 1997, FPL described in detail that voiding could occur in the Turkey Point component cooling water system during a Loss Of Offsite Power/Loss of Coolant Accident, and that, 12 containment penetration piping sections have a thermal overpressure concern. In both cases, FPL was able to conclude that the affected systems remain functional/operable using the criteria of ASME Section III, Appendix F, "Rules for Evaluation of Service Loadings with

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Level D Service Limits," as provided for in GL 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability."

With respect to voiding, FPL discussed several potential system modifications (L-97-021, pg. 9 of 10 para. 1.) to preclude void formation. FPL continues to commit to the schedule for these modifications as described in L-97-021 (pg. 9 of 10, para. 2.).

With respect to thermal overpressurization of isolated piping, FPL committed to submit a proposed license amendment to incorporate into the Updated Final Safety Analysis Report (UFSAR), the methodology of Section III, Appendix F for use in analyzing isolated piping sections in containment under post accident conditions. The proposed license amendment was scheduled to be submitted by April 30, 1997.

During FPL's evaluation of GL 96-06, consideration was given to the implementation of several system modifications to resolve the GL issues of thermal overpressurization of isolated piping. FPL has further considered system modifications (e.g., rupture disks, accumulators, or thermal relief valves) and is committing to implement modifications in response to GL 96-06 in lieu of the previous commitment to submit a proposed license amendment incorporating the methodology of ASME Section III, Appendix F into the Turkey Point UFSAR. This strategy would restore affected piping and supports to the criteria stated in the Turkey Point UFSAR.

With respect to completing modifications at the first practical opportunity, the Turkey Point Unit 3 Spring 1997 Refueling Outage commenced on March 3, 1997. It is not prudent to implement modifications during this outage since the design packages must be prepared, material procured, construction activities planned, scheduled and implemented. This process cannot be performed in an effective and controlled manner prior to the restart from the Spring 1997 Refueling Outage. Based on the imminent completion of the Unit 3 Refueling Outage, implementation of the thermal overpressurization modifications are scheduled for the Fall 1998 Unit 3 Refueling Outage.



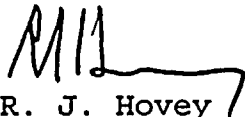
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Similar modifications are scheduled for the Fall 1997 Unit 4 Refueling Outage.

FPL considers the operability determinations, in which the interim criteria stated in Appendix F, of Section III of the ASME Code were used, to be valid for the next Turkey Point Unit 3 operating cycle and for the current Unit 4 operating cycle.

Very truly yours,



R. J. Hovey  
Vice President  
Turkey Point Plant

RJH/MSD

Attachment

cc: L. A. Reyes, Regional Administrator, Region II, USNRC  
T. P. Johnson, Senior Resident Inspector, USNRC,  
Turkey Point Plant



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STATE OF FLORIDA       )  
                                  ) ss.  
COUNTY OF DADE       )

R. J. Hovey being first duly sworn, deposes and says:

That he is Vice President, Turkey Point 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.

MIL

R. J. Hovey

Subscribed and sworn to before me this

24<sup>th</sup> day of March, 1997.

James E. Knorr  
James E. Knorr

Name of Notary Public (Type or Print)

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

My Commission expires 434300  
Commission No. January 22, 1999

R. J. Hovey is personally known to me.

