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ACCESSION NBR: 9707090304 DOC. DATE: 97/07/01 NOTARIZED: NO DOCKET #
EACIL: 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 AUTHOR AFFILIATION
HOVEY, R.J. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Informs of util intention to conduct graded review of Turkey Point FSAR. Reviews are expected to be completed by 980118.

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10 CFR §50.73

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 50-251
Voluntary Initiative to Review
Final Safety Analysis Report

On October 18, 1996 the NRC published revisions to its "General Statements of Policy for Enforcement Actions," to address issues associated with departures from the Final Safety Analysis Report (FSAR) (51 Fed. Reg. 54,461, October 18, 1996). The purpose of this letter is to inform the NRC of the intent of Florida Power and Light Co. (FPL) to conduct a graded review of the Turkey Point Final Safety Analysis Report (FSAR). A-1

On October 9, 1996, NRC issued a request for information under 10 CFR 50.54(f) regarding the adequacy and availability of design bases information at nuclear plants. FPL responded to this request on February 12, 1997, which included a brief discussion of proposed additional reviews planned for the Turkey Point FSAR.

Turkey Point Units 3 and 4 were originally licensed by the NRC in 1972 and 1973, respectively. The FSAR for Turkey Point consists of five volumes related primarily to the design of safety systems and the accident analyses. Audits and reviews conducted of the FSAR to date have found some discrepancies that are attributed to attention to detail in the use of the document and its updating. None of these discrepancies have been deemed to be safety significant or to affect operation of the Turkey Point Units. To address these discrepancies, FPL plans to perform a graded review of the FSAR. Therefore, the review effort and resources will be expended in those areas of greatest safety significance.

Large portions of the FSAR have recently been extensively reviewed as part of Turkey Point's Thermal Power Uprate project, and would not be expected to contain the types of discrepancies found in previous FSAR review efforts. On the other hand, certain sections of the FSAR have not been reviewed recently and may require more extensive review. FPL plans to prioritize this review according to risk significance of the equipment described in each section. Three priority levels have been established. Priority 1 sections (auxiliary coolant, safety injection, containment spray, emergency containment cooling, emergency 1/0
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containment filtration, chemical and volume control, reactor protection system, engineered safety features actuation systems, electrical systems, and auxiliary feedwater) will be performed first. Priority 2 sections (reactor coolant system, building ventilation systems, sampling systems, regulating systems, fuel handling, steam and power conversion, waste disposal, structures including containment, etc.) will follow, and priority 3 sections will be reviewed last (introduction, site and environment, flooding, fire protection, conduct of operations, and safety analysis).

The review of priority 1 sections and most priority 2 sections will include comparisons against procedures, and validation of key values identified in the FSAR. Chapter 14 (Accident Analysis), has gone through extensive review and changes as a result of the Thermal Power Uprate project. This chapter will be reviewed for consistency as part of this effort. Certain historical Appendices and Sections which have been completely revised, e.g., Sections 6.6 (Containment Isolation) and 9.17 (Instrument Air), are not part of this planned review effort. FPL does not plan to perform any walkdowns of equipment as part of this effort due to previous extensive plant walkdowns to correct plant documentation in the past.

The FSAR review effort will be led by a multi-discipline engineering team and will involve, to various extents, all plant departments. These reviews are expected to be complete by October 18, 1998.

If there are any questions, please contact us.

Very truly yours,



R. J. Hovey
Vice President
Turkey Point Plant

JEK

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

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