

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Submits response to GL 98-02, "Loss of Reactor Coolant Inventory & Associated Potential Loss of Emergency Mitigation Functions While in SD Condition."

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L-98-258  
10 CFR 50.4  
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 50-251  
Response to Generic Letter 98-02


On May 28, 1998, the NRC issued Generic Letter (GL) 98-02, "Loss of Reactor Coolant Inventory and Associated Potential for Loss of Emergency Mitigation Functions While In a Shutdown Condition," to request that all licensees assess the susceptibility of their residual heat removal (RHR) and emergency core cooling (ECC) systems to common-cause failure as a result of reactor coolant system (RCS) draindown while in a shutdown condition, and to provide information that will enable the NRC staff to verify whether licensees comply with NRC regulatory requirements and conform with current licensing bases. This letter provides the Florida Power and Light Company response to GL 98-02 for Turkey Point Units 3 and 4.

GL 98-02 Required Information Item (1) requested licensees to perform an assessment of whether the ECC systems include certain design features, such as a common pump suction header, which can render the systems susceptible to common-cause failure as a result of events similar to the Wolf Creek RCS drain-down event of September 17, 1994. Turkey Point is designed with a common pump suction header for the ECC systems, and is therefore, susceptible to common cause failure, assuming events similar to the Wolf Creek event occur (i.e. loss of command and control in the control room, operation of systems outside Technical Specification limits, failure to follow written procedures).

The Turkey Point RHR system design has specific design features, specifically, interlocked motor operated valves, which minimize the potential of diverting RCS fluid to the Refueling Water Storage Tank during hot shutdown. A review for potential drain-down pathways revealed the credible drain-down scenarios are limited to flowpaths containing valves provided with open-permissive interlocks which prevent inadvertent operation. Administrative controls are placed on system components, work control processes and control room activities, which significantly reduce the potential for an event similar to the Wolf Creek event. Based on the Turkey Point features described above and the administrative controls in place, the safety-related function of the RHR and ECC systems during hot shutdown is assured.

This response is provided pursuant to the requirements of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f).

Very truly yours,

  
R. J. Hovey  
Vice President  
Turkey Point Plant

OIH

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

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Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
L-98-258

STATE OF FLORIDA            )  
                                      ) ss.  
COUNTY OF MIAMI-DADE    )

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

That he is Vice President, Turkey Point Plant, for the Nuclear Division of Florida Power & 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.

  
\_\_\_\_\_  
R. J. Hovey

STATE OF FLORIDA

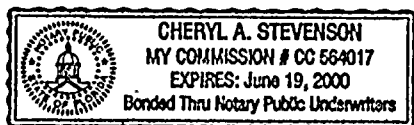
COUNTY OF MIAMI-DADE

Sworn to and subscribed before me

this 16<sup>th</sup> day of November, 19 98

by R. J. Hovey, who is personally known to me.

  
\_\_\_\_\_  
Name of Notary Public - State of Florida



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(Print, type or stamp Commissioned Name of Notary Public)



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