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SUBJECT: Forwards summary of corrective actions implemented by FPL re  
GL 96-06, "Assurance of Equipment Operability & Containment  
Integrity During Design Basis Accident Conditions."

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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 - Closure Summary

NRC Generic Letter (GL) 96-06, "Assurance of Equipment Operability and Containment Integrity During Design Basis Accident Conditions," issued on September 30, 1996, requested licensees to provide 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. Florida Power and Light Co (FPL) provided its response to GL 96-06 by letters L-96-270, dated October 23, 1996, L-97-021, dated January 28, 1997, L-97-086, dated March 24, 1997, and L-98-240, dated September 28, 1998.

The purpose of this letter is to provide a summary of the corrective actions implemented by FPL for Turkey Point Units 3 and 4. The GL 96-06 corrective actions summary is attached.

Should there be any questions, please contact us.

Very truly yours,

R. J. Hovey  
Vice President  
Turkey Point Plant

OIH

Attachment

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

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**Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity  
During Design Basis Accident Conditions," Closure Summary**

By letters L-97-021, dated January 28, 1997 and L-97-086, dated March 24, 1997, Florida Power & Light Co. (FPL) committed to implement facility modifications providing the final resolution of GL 96-06. Implementation of the facility modifications was scheduled for the Fall 1997 Turkey Point Unit 4 Refueling Outage and the Fall 1998 Turkey Point Unit 3 Refueling Outage. FPL has completed implementation of the necessary modifications as scheduled and is requesting closure with respect to GL 96-06.

By letter L-97-021, dated January 28, 1997, FPL made the following two commitments: (1) implement long-term corrective actions to preclude voiding of the containment air coolers, and (2) submit a proposed license amendment to incorporate the methodology of Section III, Appendix F, for use in analysis of isolated piping sections in containment under post accident conditions. By FPL letter L-97-086, dated March 24, 1997, the second commitment was revised to implement modifications in lieu of submitting a proposed license amendment.

Turkey Point completed the installation of new Component Cooling Water (CCW) head tanks, the long-term corrective action to preclude voiding of the containment air coolers. The CCW head tanks provide sufficient static pressure to preclude formation of steam voids in the containment coolers under postulated accident conditions. The head tanks are installed on the containment structures at a nominal height of 144 ft and provide a minimum static pressure of 28 psig at a highest cooler elevation. This head pressure is sufficient to maintain the cooling water sub-cooled in consideration of a maximum cooler water temperature of 270°F. The installation of the head tanks was discussed in detail under FPL Letter L-98-240, dated September 28, 1998, in response to NRC Request for Additional Information - "Resolution of GL 96-06 Issues at Turkey Point 3 and 4," dated July 16, 1998.

With respect to the thermal overpressurization concern, Turkey Point has implemented modifications to eliminate the possibility of pressure boundary failure. FPL Letter L-97-021 identified twelve piping sections which were susceptible to possible thermal overpressurization. The corrective actions for these piping sections included the installation of thermal relief valves, revised valve alignments, and drilling the disc of check valves. Table 1 provides a summary of the various modifications. The relief valve installations are self-explanatory. A change in valve alignment was utilized for the Safety Injection test lines to provide an open flowpath to an existing relief valve. The Unit 4 containment sump pump discharge check valves discs were drilled to provide for pressure relief capability. Note that the function of these check valves is to prevent recirculation through an idle pump and they do not provide containment isolation function.

The necessary modifications have been implemented in resolution of the concerns associated with GL 96-06. The new CCW head tanks preclude the possibility of steam formation in the containment air coolers, and thermal relief capability has been provided for the penetrations of concern.

Table No.1  
Piping Sections provided with thermal relief capabilities

Item	Location	Portion of Piping Between Valve(s) and Valves(s)		Thermal Relief Capability
1	Penetration 9- Pressurized Liquid Space Sample	CV-*-953	CV-*-956B	Installed Thermal Relief Valves
2	Penetration 23 - Containment Sump Discharge	*-4692A *-4692B	CV-*-2822	U3 - Installed Thermal Relief Valve U4 - Drilled Check Valve Disk
3	Penetration 25 - RCP Seal Water Leak/off Excess Letdown	MOV-*-6386	MOV-*-381	Installed Thermal Relief Valves
4	Penetration 47 - Primary Water Supply to Wash Header	*-10-582	*-10-567	Installed Thermal Relief Valves
5	Penetration 55 - Accumulator Sample	CV-*-955C CV-*-955D CV-*-955E	CV-*-956D	Installed Thermal Relief Valves
6	Excess Letdown Piping	CV-*-387	HCV-*-137	Installed Thermal Relief Valves
7-12	Safety Injection Test Line	CV-*-850A CV-*-850B CV-*-850C CV-*-850D CV-*-850E CV-*-850F	*-884A *-884B *-884C *-884D *-884E *-884F	Revised valve alignment to provide open flowpath to existing relief valve

\* Units 3 and 4

