

NSRC REGION II
ATLANTA, GEORGIA



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August 16, 1982
L-82-358

Mr. James P. O'Reilly
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
IE Inspection Report 82-19

Our letter (L-82-255) dated June 18, 1982 responded to IE Inspection Report 82-19. In that response, we stated that we would provide an update on the status of the continuous monitors that will sample the air ejector exhaust.

As discussed with your staff on August 2, 1982, we believe the violation should be reconsidered for the reasons discussed with your staff and summarized below. In paragraph 11.1.3 of the Turkey Point Final Safety Analysis Report (FSAR), under the heading of Gaseous Waste, provisions are made for monitoring the air ejector exhaust when there is sampling evidence of a primary to secondary leakage. It says:

"The iodine release via the steam jet air ejectors will be calculated from a weekly sampling for iodine at the air ejector discharge and a concurrently made air flow measurement."

It is our opinion that part of the exception in paragraph 3.9.2.i of the Technical Specifications was related directly to this statement in the FSAR, and that the requirement in Technical Specification 3.9.2.i to comply with AEC Safety Guide 21 only applies to those analyses which are not excepted and discussed individually in Paragraph 3.9.2 a through h.

We recognize that your staff's concern is to correct the moisture problems with the sampling systems in order that this equipment may function properly. The problem has been referred to our Architect Engineer for resolution. As discussed with your staff, the problem is more complex than originally expected. Thus, the Architect Engineer has not yet been able to provide a schedule for the engineering resolution of the problem. They do expect to provide us a schedule in about two weeks, at which time we will supply our completion schedule to you.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PLP/mbd

cc: Harold F. Rei

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