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USNRC

5832 SE Riverboat Drive  
Stuart, Florida 3499793 JUN -9 P4:16  
(407) 288-2867  
October 15, 1992

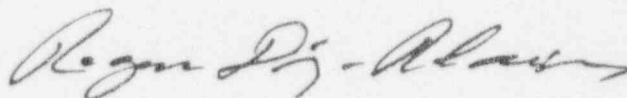
OFFICE OF SECRETARY  
DOCKETING

Mr. Thomas E. Murley  
Director of Nuclear Reactor Regulations  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Murley

By means of this letter and its supporting attachment I am formally requesting that the Florida Power & Light Turkey Point nuclear units not be allowed to start-up, per the rights and criteria defined in 10CFR2.206 of the code of federal regulations until an adequate set of answers or modifications answer the objections and concerns defined in the attachment. I have lived most of my life in Dade County, and my immediate family resides there today. I am a citizen of the United States and a Florida resident, and my concerns have the documented backing of hundreds of South Floridians that have signed a petition for Senator Bob Graham to initiate a congressional investigation of these matters.

Sincerely,



Regino R. Diaz-Robainas

Attachment-4 pages

VIA FAX and US Mail

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02-06843-W-00

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- 1)- On 8/24/92, the day when Hurricane Andrew attacked South Florida, the NRC transcripts of events at Turkey Point includes the following discussion:

"Licensee noted that this Black Start Diesel which can be used as backup if EDG's fail is inoperable at this time due to a lot of oil surrounding the Diesel following an oil tank rupture...A lot of grass is in the intake structure and licensee has to clean the strains every hour to prevent them from clogging up (supplies cooling water to EDG's)..."

The proposed interim Fire Protection system for Unit 4 defined by JNP-PTN-SEMJ-92-034 Rev. 0 dated 9/23/92 uses screen wash pumps which are, by its own description, "normally used to clean collected debris off the intake structures' travelling screens" for fire-protection functions.

Given the documented vulnerability of these systems, the proposed modification reduces the margin of safety for both EDG's required during loss of offsite power and the Fire Protection functions: The former by the nonconservative abolition of EDG component cooling functions, and the latter by depending on unreliable, non-safety related sources as a prime means of fire protection.

- 2)- Then Central Receiving and Health Physics buildings were destroyed during the hurricane. Temporary Diesel pumps used to guarantee the availability of Fire Protection water are housed at the Central Receiving building. The demonstrated vulnerability of this location combined with the intended, interim dependence on this source as a redundant means of fire protection reduce the margin of safety.

- 3)- Critical communication and evacuation mechanisms were completely unavailable during hurricane Andrew for a significant period of time during which the units were still in hot shutdown and requiring the operation of critical cooling equipment without offsite power. The burden of proof lies in demonstrating that this absence of safety will no longer occur during future events.

- 4)- On 8/25/92 FPL Management violated Technical Specification 3.4.9.3 and used "lack of lighting in Containment & support personnel on site" as excuses for this dangerous reduction in the margin of safety. The susceptibility of the old, embrittled Turkey Point reactor vessels has been established and has been an area of concern to previous NRC administrations. The failure to perform license-required surveillances in the absence of alternate technical specification mandated venting of the Reactor Coolant System constitutes a serious reduction of the margin of Safety. It is not clear what the NRC position is with regards

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to arbitrary and subjective implementation by FPL Management of required technical specifications and LCO's during crises. If the Technical Specifications are wrong, they must be revised and plant configuration must be made to comply. Otherwise, the technical specifications must be adhered to. These issues must be resolved prior to another imprudent unit start-up. In addition, the Diesel loading profile must be reviewed such that it assures sufficient lighting for all areas inside containment, or outside, requiring surveillance during emergencies to provide for Nuclear-safety or quality-related purposes. And the availability of enough workers to do the necessary work on site, and support work offsite must be re-evaluated in the light of the massive lay-offs that FPL Management recently conducted. Has the NRC conducted such a review. If so, what are the conclusions and bases for those conclusions? Moreover, the reliability of the Overpressure Mitigation System(OMS) as a whole must be re-evaluated given the documented weaknesses in surveillance, setpoint program, and component reliability. An honest Failure Modes and Effects analysis must be performed prior to start-up, with the consequent modification to plant configuration, to reliably prevent or mitigate an accident of unpredictable magnitude; if a forthright analysis is incompatible with the economics of reconstruction, the nuclear units must remain shut down, and safer, renewable energy structures must be built to replace them. On October 5, the OMS was erroneously actuated, increasing the probability of dangerous thermal shock to the reactor vessel and its piping thru the added risk of a spurious safety injection. Last week, once again, the effect of the haste to start up the unit with insufficient workers under overworked and rushed conditions led to the accident of a worker, operating a crane, falling inside radioactive water in the Reactor cavity.

5)- There exists a disturbing scarcity of information regarding monitored radiation/contamination/exposure data from 8/24/92 until today. Has there been any radioactive release, or any kind of venting that may have resulted in such release? Or, does the NRC not have enough reliably recorded data, due in some cases to equipment problems, to make a determination? These questions must be answered clearly prior to any contemplated, prudent startup.

6)-The proposed interim Fire Protection system for Unit 4 violates Appendix R technical specifications such as 3.7.8.1 which constrain limiting conditions for operation(LCO's). The

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interim Raw Water Fire Protection system consists of an unreliable and pseudo-redundancy: On the one hand, a RWT-2 crippled by lack of automatic level control or indication and requiring manual operation and local only monitoring to maintain proper tank level, a questionable proposition at best during hurricanes or other events coupled to a newly purchased electric fire pump of unclear specifications and procurement process, hurriedly replacing the original pump which is in turn aligned, but not in a fully restored manner, to the Fire Protection header. On the other hand, three temporary diesel pumps, for which no licensing credit is taken due, perhaps, to vulnerability of location, unassured power supplies and a history of braker coordination problems, paralleled with the screen wash pumps discussed in (1). The latter have a very vulnerable 6" hose connection to the main header manual hose streams which restricts flows in the neighborhood of 500 gpm, a nonconservative reduction from the previous NRC declared standard of 750 gpm.

In a related concern, why are FPL Management Safety Evaluations being used in place of Engineering Packages, complete with drawing, instructions, surveillance and functional test requirements, procurement documentation, and failure modes & effects analyses, to implement radically altered plant configurations that are in contradiction, or at best tenuous conformance to Plant technical specifications and design bases?

7)- Why is FPL not being required to request a License Amendment, or as a minimum, involve the NRC in the review of unreviewed safety questions, as required by the code of federal regulations? Why are Safety Evaluations being used, instead, to short-circuit the process of reviewing unanalyzed interim plant configurations, prior to startup? Why are the mitigation functions not being addressed by evaluations such as the Interim Fire Protection Safety Evaluation issued by FPL? Why, in such evaluations, are not specific surveillance requirements, functional testing, etc. not specified for equipment whose nature and configuration has changed to perform quality or nuclear-safety related functions? Are there other such cases which bring into question the margin of safety of our people? This pattern represents a violation of 10CFR50.59 requirements.

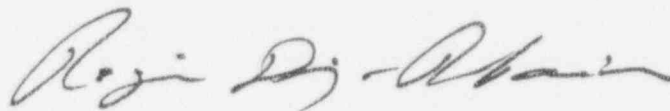
8)- The performance of Turkey Point Unit 4 in the period ranging from September 29 until today raises serious concerns about the ethics and prudence of current FPL Management which must be answered prior to any future startups. In an irresponsible haste to start the unit, and after claiming in the press that it did not immediately need the power it would provide, FPL Management failed to perform critical start-up

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surveillance tests and procedures on the Reactor Coolant system, and in the Feedwater equipment needed to ascertain adequate levels of water in the Steam Generators leading to serious difficulties in cooling down the primary system after the inevitable manual or automatic trip that resulted from the the loss of feedwater. This occurred while the unit was significantly past critical, and reinforces our worries regarding management irresponsibility discussed in item #4.

For these reasons, and on the weight of my professional judgment as a former Senior Engineer and Lead Engineer at FPL, and on my educational qualifications with a Master of Science in Electrical Engineering, and on the regulatory bases defined in 10CFR Part 2.206, I urge the Nuclear Regulatory Commission to prevent FPL Management from starting either Turkey Point nuclear unit until the above issues have been properly resolved. I have a community interest in this matter as I have resided in Dade county for most of my life, and members of my immediate family still reside here.



Regino R. Diaz-Robainas