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NOV 21 1985

Florida Power and Light Company

✓ ATTN: Mr. J. W. Williams, Jr.

Group Vice President

Nuclear Energy Department

P. O. Box 14000

Juno Beach, FL 33408

Gentlemen:

SUBJECT: 10 CFR 50.59 EVALUATION FOR LIMIT SWITCH SETTINGS OF RESIDUAL HEAT
REMOVAL VALVE MOV-872, TURKEY POINT UNITS 3 AND 4 (DOCKET NOS.
50-250 AND 50-251)

We have received your letter of August 5, 1985, (L-85-301) with an attached 10 CFR 50.59 evaluation for limit switch settings of residual heat removal valve MOV-872 at Turkey Point Unit 4. Your response did not resolve our concerns related to the changes that were made on this valve in the past. The dependence that is placed on the alternate low-head safety injection (LPSI) header does not appear to be consistent with the absence of a description of this header in the FSAR and the statement in your letter that "no credit is taken for the availability of this alternate flow path."

We recognize the validity of the position stated in your letter that the Emergency Core Cooling System (ECCS) is not designed to accommodate all single passive failures, such as the normal Residual Heat Removal (RHR)/LPSI header. We are concerned, however, that sufficient flow would not be available to effect normal reactor cooldown or adequate post-(Loss of Coolant Accident (LOCA) cooling if the normal RHR/LPSI header cannot be used. This possibility is anticipated in the Turkey Point Off-Normal Operating Procedure 3208.1 and in Emergency Operating Procedure 20001. Consequently, we want to know why a 10 CFR 50.59 review was not made before a safety-related valve (MOV-812) was throttled to 25% flow.

Inasmuch as this problem was identified in January 1985, I propose that further efforts be expedited to resolve the issues listed in the enclosure to this letter. I request that someone from your staff be prepared to respond to these issues with Mr. W. P. Kleinsorge, of the NRC Region II office, at the Turkey Point site during the January, 1986 outage. Direct arrangements for this meeting may be made between Florida Power and Light Company and Mr. Kleinsorge (404) 331-5584.

Sincerely,

Original Signed by
Roger D. Walker

Roger D. Walker, Director
Division of Reactor Projects

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Enclosure: (See page 2)

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Enclosure:

Concerns Related to Throttling and
Unthrottling Valve MOV 872 at
Turkey Point 4

cc w/encl:

- ✓ C. M. Wethy, Vice President
Turkey Point Nuclear Plant
- ✓ C. J. Baker, Plant Manager
Turkey Point Nuclear Plant
- ✓ R. J. Acosta, Plant QA Superintendent

bcc w/encl:

- ✓ NRC Resident Inspector
Document Control Desk
State of Florida
W. Kleinsorge
J. Blake

RII

W. Kleinsorge:ls
09/15/85

RII

J. Blake
09/30/85

RII

AR Herdt
09/16/85

RII

AF Gibson
09/16/85

RII

VB Brownlee
10/14/85

ENCLOSURE

CONCERNS RELATED TO THROTTLING AND UNTHROTTLING
VALVE MOV-872 AT TURKEY POINT UNIT 4

1. What was the basis for installing the alternate RHR/LPSI Header?
2. Upon loss of recirculation flow path, why is credit taken for the high head safety injection (HPSI) header rather than the alternate RHR/LPSI header?
3. Why were Abnormal Operating Procedure 3208.1 and Emergency Operating Procedure 20001 based on the use of the alternate RHR/LPSI header rather than on the HPSI header?
4. Were the effects on normal shutdown and on the post LOCA ECCS capability analyzed before valve MOV 872 was throttled in March, 1978 or unthrottled in April, 1984? If such analyses were made, were they also pertinent to Unit 3?
5. Considering that part of the flow path which includes the alternate header also includes a recirculation line, how does the setting of Valve MOV-872 preclude runout of the RHR pumps?