

September 16, 2021

L-2021-182



U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Re: Turkey Point Unit 3  
Docket Nos. 50-250  
Summary of Commitment Revisions-Emergency Diesel Generator Fuel Oil Storage Tank  
Cleaning Inspection Commitment Revisions

References:

1. L-98-012, FPL letter dated Feb 02, 1998, "Revised Proposed License Amendments and Request for Additional Information (RAI) – Diesel Fuel Storage Systems."
2. NRC letter dated June 9, 1998, "Turkey Point Units 3 and 4- Issuance of Amendments Regarding Diesel Fuel Oil Storage and Transfer System (TAC Nos. M97376 and M97377)"

The purpose of this letter is to provide a summary of commitment revisions associated with the Turkey Point Unit 3 Emergency Diesel Fuel Oil Fuel Storage and Transfer System. The commitments were evaluated and revised using the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitment Changes. Enclosure 1 provides the original commitments. Enclosure 2 provides the revised commitments. Enclosure 3 provides the corresponding justification for revising these commitments.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Hess, Turkey Point Licensing Manager, at 305-246-4112.

Sincerely,

A handwritten signature in blue ink, appearing to be 'RJH', with a long horizontal line extending to the right.

Robert J. Hess  
Licensing Manager  
Turkey Point Nuclear Plant

Enclosures

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

## **Enclosure 1 to L-2021-188**

### **Turkey Point Units 3 Emergency Diesel Generator Fuel Oil Storage Tank Cleaning Inspection and PM Commitment Updates Original Commitments**

1. "The proposed three temporary stationary tanks will be mobile trailer rectangular style tanks (43 ft long, 11 ft high, 8 ft wide) having a capacity of approximately 19,000 gallons each. These tanks will be WORKSAFE™, or equivalent, Bi-Level steel tanks, with cross style internal bracing with an approximate empty weight of 21,000 lbs." [Ref 1, Attachment 1, Page 8 of 9]
2. "These trailer/tanks are provided with tie-down capability and will be secured by temporary measures to withstand winds of at least 120 mph." [ Ref 1, Attachment 1, Page 8 of 9]
3. "The temporary storage tanks will be located inside the protected area in the vicinity of the Nuclear Plant Central Receiving Facility. The temporary tanks will be located greater than fifty (50) feet from safety related or safe shutdown components or circuits. This does not produce any threat to fire protection or safe shutdown capability and therefore represents a configuration that is bounded by existing fire hazards analysis." [Ref 1, Attachment 2, Page 3 of 4.]
4. "A dedicated mobile tanker staged inside the protected area to transfer fuel from the temporary storage tanks to the permanent day/skid tank system. The mobile tanker will have an integral transfer pump to facilitate movement of fuel to either of the two truck fills at the Unit 4 EDG building or day tank truck fills (auxiliary fill station) at the Unit 3 EDGs." [Ref 1, Attachment 1, Page 8 of 9]
5. "In the event of a hurricane, the mobile tanker along with hoses portable pumps, filters, etc., would be garaged inside the onsite Central Facility which is designed to withstand winds of at least 120 mph." [Ref 1, Attachment 1, Page 9 of 9]
6. "Manual actions required to provide a 7-day supply of fuel to the EDGs can easily be accomplished in the 17 hours of EDG operation provided by the 3880-gallon capacity of a single EDG day and skid tank." [Ref 1, Attachment 2, Page 2 of 4]
7. "Combing the excess available from the Unit 4 storage tanks and the nominal volume of the Unit 3 day and skid tanks give a total of 12,480 gallons (4300 x2 + 3880) of available fuel to either of the Unit 3 EDGs." [ Ref 1, Attachment 2, Page 2 of 4]

## **Enclosure 2 to L-2021-188**

### **Turkey Point Units 3 Emergency Diesel Generator Fuel Oil Storage Tank Cleaning Inspection and PM Commitment Updates Revised Commitments**

1. "The proposed three temporary stationary tanks will be 45 ft. long, 11 ft. high, 8.5 ft. wide; having a capacity of approximately 21,000 gallons each. These tanks are Adler FRAC Tanks are made of steel and with an approximate empty weight of 29,500 lbs. each."
2. "Engineering Evaluation (EC 294570) determined that the temporary tanks are capable of withstanding winds of 120 mph without being secured by tie-down temporary measures."
3. "The temporary storage tanks will be located, at the Turkey Point Fossil side, at an extension of the Turkey Point Nuclear site protected area, just beyond the Nuclear/Fossil boundary fence. The temporary tanks will be relocated in an area greater than fifty (50) feet from safety related or safe shutdown components or circuits. This new location does not produce any threat to fire protection or safe shutdown capability and therefore represents a configuration that is bounded by existing fire hazards analysis."
4. "A pumping truck will be provided inside the protected area to transfer fuel from the temporary storage tanks to the permanent day/skid tank systems. This truck will have hoses of sufficient length to pump fuel between the Unit 3 Diesel Oil Storage Tanks and the temporary storage tanks as well as to transfer fuel from the temporary tanks to the Unit 3 EDG Day Tank Alternate fill Station located at the north side of the unit 3 EDG Building. The pumping truck will also facilitate movement of fuel to either of the two fills at the Unit 4 EDG building."
5. "In the event of a hurricane, the pumping truck along with hoses etc., would be garaged inside the onsite FLEX building which is designed to withstand winds of at least 120 mph."
6. "Manual actions required to provide a 7-day supply of fuel to the EDGs can easily be accomplished in the 17 hours of EDG operation provided by the normal operating band of 3790 gallons combined capacity of a single EDG day and skid tank."
7. "Combining the excess available from the Unit 4 storage tanks and the nominal volume of the Unit 3 day and skid tanks give a total of 12,390 gallons ( $4300 \times 2 + 3790$ ) of available fuel to either of the Unit 3 EDGs."

## **Enclosure 3 to L-2021-188**

### **Turkey Point Units 3 Emergency Diesel Generator Fuel Oil Storage Tank Cleaning Inspection and PM Commitment Updates Justification for Revising Commitments**

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1. The revised commitment documents the updated style of tanks to be used for storage of the Diesel oil fuel. The original commitment documents the dimensions, the style, the capacity and the weight of the tanks. These tanks when in place, would each have a footprint of approximately 43 ft. by 8.5 ft., capacity of 21,000 gallons and an empty weight of 29,500 lbs. Based on the dimensions, style, capacity and weight, the Adler FRAC style steel Tanks are found to be equivalent to the previously approved temporary stationary style WORKSAFE™ steel tanks.
2. The Adler FRAC tanks have an empty weight of 29,500 lbs. The tanks are constructed with only a rear set of wheels requiring to be hitched to a truck in order to be moved. EC 294570 determined that the tanks, even empty, are capable of withstanding winds up to 120 mph. Furthermore, if each tank is filled to approximately halfway with only 10,000 gal of fuel, the weight is increased by 68,000 lbs. for a total weight of 97,500 lbs. per tank. Thus, there is reasonable assurance that the tanks will not be moved even in the event of inclement weather even without temporary tie-down measures.
3. The revised commitment relocates the temporary tanks in the vicinity of the neighboring FPL Turkey Point Fossil Units 1 and 2, in an area just north of the Turkey Point Unit 3 Emergency Diesel Generator building. For the duration of the 10-year surveillance, this area will have a temporary fence erected around it and security personnel will be stationed at this location, and as such, this location will be considered an extension of the Turkey Point Nuclear Plant Protected Area (PA). The relocation of the temporary tanks in the vicinity of the Fossil plant is less than the previous location of the Central receiving area, which was at least 1,000 ft. away. However, relocation of the temporary tanks will still be at least 50 ft. away from any safety-related or fire safe-shutdown components or circuits. Since the new location is outside of the normal PA, and thus outside of any existing fire zones for the plant, the new location does not represent any threat to fire protection or safe shutdown capability and therefore represents a configuration that is bounded by existing fire hazards analysis.
4. The revised commitment eliminates the need to have a mobile fuel transfer tanker due to the proximity of the temporary tankers to the EDGs. Instead, a fuel transfer system shall be available that can directly connect between the temporary tankers and the EDG fuel supply lines as necessary. The vendor will provide a pumping truck with hoses of sufficient length to pump the fuel between the Unit 3 DOST and the temporary tankers as well as to transfer fuel to either of the two truck fills at the Unit 4 EDG building or day tank truck fills (auxiliary fill station) at the Unit 3 EDGs.

## **Enclosure 3 to L-2021-188**

### **Turkey Point Units 3 Emergency Diesel Generator Fuel Oil Storage Tank Cleaning Inspection and PM Commitment Updates**

#### **Justification for Revising Commitments**

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5. The revised commitment identifies the FLEX building, as the robust structure for storing the pumping truck in the event of a hurricane, which is designed to withstand winds of at least 120 mph. By changing the garage location, there is no additional risk added if the pumping truck is garaged at the FLEX building which meets Seismic Category I requirements.
6. The revised commitment ensures that manual actions required to provide a 7 day supply of fuel to the EDGs can easily be accomplished in the 17 hours of EDG operation even with lower than the top-off levels of the EDG Day and skid tanks, but within the normal operating band of a combined capacity of 3,790 gallons. With Unit 3 EDG running at rated capacity of 2500 KW with the lower levels (of combined capacity of 3,790 gallons), the run time of 17 hours continues to be met.
7. The revised commitment updates the combined capacity of the EDG Day and skid tanks to reflect the lowering of the top-off levels from 3880 to 3790 gallons. The changed commitment has not no impact on the run time of 55 hours for the Unit 3 EDG (assuming fuel oil transfer from Unit 4) prior to reaching the Technical Specification minimum volume for Unit 4 fuel oi storage tanks.