FPL

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L-2000-068
10 CFR §50.90

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

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Proposed License Amendments
Laboratory Testing of Nuclear Grade Activated Charcoal
Additional Information

In accordance with 10 CFR §50.90, Florida Power and Light Company (FPL) requested in letter L-99-239, dated November 23, 1999, that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify Technical Specification (TS) 3/4.6.3, Emergency Containment Filtering System, TS 3/4.6.6, Post Accident Containment Vent System, and TS 3/4.7.5, Control Room Emergency Ventilation System. The proposed license amendments were submitted in response to Generic Letter (GL) 99-02, Laboratory Testing of Nuclear-Grade Activated Charcoal, which requires that ASTM D3803-1989 be used for testing both new and used charcoal in engineered safety feature (ESF) applications.

As a result of conversations with your staff, FPL is pleased to provide the following additional information regarding the Control Room Emergency Ventilation System (CREVS). The face velocity of the CREVS charcoal filters is not an overt design parameter. Rather, the design flow rate for the CREVS filters is a volumetric flow rate of 1000 cubic feet per minute.

FPL reviewed the Turkey Point UFSAR and available correspondence on control room habitability to determine if the CREVS charcoal filter face velocity was previously transmitted to the NRC as part of an earlier submittal. No source documents were found that would indicate that the CREVS charcoal filter face velocity was previously docketed. As a result, FPL has prepared the attached tables. These tables summarize the information previously provided to the NRC in our responses to Generic Letter 99-02. The tables also include the requested information on CREVS face velocity.

The following parameters substantiate the 40 fpm CREVS face velocity specified in the attached table:

CREVS Filter Volumetric Flow:	1000 cfm
Number of CREVS Charcoal Cells:	3
Number of Beds in Each Cell:	2
Charcoal Bed Surface Area:	643 in^2 (26.5 in. x 24.25 in.)

Dividing the filter volumetric flow rate by the number of CREVS charcoal cells gives a volumetric flow rate of approximately 334 cfm per cell. Dividing this cell volumetric flow rate by the total charcoal bed surface area for flow in each cell gives the charcoal filter face velocity. Since each charcoal bed has 643 in^2 of surface area for flow, and each cell has a parallel arrangement of two charcoal beds, the total surface area for flow is 1286 in^2 or 8.9 ft^2 per cell. Dividing the cell volumetric flow rate of 334 cfm by this total surface area for flow gives a face velocity, i.e., linear velocity, of approximately 37.5 fpm. This value is rounded up to 40 fpm to account for a worst case combination of dimensional tolerances, and the slight reduction in surface flow area caused by the charcoal bed framing members.

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The above parameters were taken from Section 4.7.5c.1 of the plant technical specifications, and Revision 1 of drawings 5610-M-38-16 and 5610-M-38-19.

Should there be any questions, please contact us.

Very truly yours,

R. J. Hovey
Vice President
Turkey Point Plant

attachment

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Florida Department of Health and Rehabilitative Services

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STATE OF FLORIDA)
) ss.
COUNTY OF MIAMI-DADE)

R. J. Hovey being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

R. J. Hovey

Subscribed and sworn to before me this
9th day of March, 2000.

Cheryl A. Stevenson

Name of Notary Public (Type or Print)

CHERYL A. STEVENSON
MY COMMISSION # CC 564017
EXPIRES: June 19, 2000
Bonded Thru Notary Public Underwriters

R. J. Hovey is personally known to me.

TABLE 1 - CURRENT TS REQUIREMENTS

System Description					Current TS Requirements					
TS Section	System	Bed Thickness (inches)	Credited Efficiency[1] (methyl iodide)	Face Velocity (ft/min)	Test Penetration (methyl iodide)	Safety Factor[2]	Test Standard	Test Temp[2] (°C)	Test RH[2]	Face Velocity[2] (ft/min)
3/4.6.3	ECFS	2	30%	40	N/A[4]	N/A	ANSI N510-1975	130	95%	40
3/4.7.5	CREVS	2	95%	40	≤ 1%	5	ANSI N510-1975	25	70%	40
3/4.6.6	PACVS	1	N/A[3]	14	≤ 10%	N/A	ANSI N510-1975	25	70%	40

[1] Credited as used in the safety analyses

[2] Not a current technical specification requirement

[3] Methyl iodide removal by the PACVS is not credited in the plant dose analyses

[4] Methyl iodide penetration in the ECFS is not tested. Current technical specification only requires elemental iodine testing

TABLE 2 - PROPOSED TS REQUIREMENTS

System Description					Proposed TS Requirements					
TS Section	System	Bed Thickness (inches)	Credited Efficiency[1] (methyl iodide)	Face Velocity (ft/min)	Test Penetration (methyl iodide)	Safety Factor[2]	Test Standard	Test Temp (°C)	Test RH	Face Velocity[2] (ft/min)
3/4.6.3	ECFS	2	30%	40	< 35%	2	ASTM D3803-1989	30	95%	40
3/4.7.5	CREVS	2	95%	40	< 2.5%	2	ASTM D3803-1989	30	95%	40
3/4.6.6	PACVS	1	N/A[3]	14	< 10%	N/A	ASTM D3803-1989	30	95%	40

[1] Credited as used in the safety analyses

[2] Not a proposed technical specification requirement

[3] Methyl iodide removal by the PACVS is not credited in the plant dose analyses