



L-2001-15

JAN 19 2001

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Response to Request for Additional Information for the
Review of the Turkey Point Units 3 and 4
License Renewal Application

By letter dated December 22, 2000, the NRC requested additional information regarding the Turkey Point Units 3 and 4 License Renewal Application (LRA). Attachment 1 to this letter contains the responses to the Requests for Additional Information (RAIs) associated with Subsections 2.3.3.10 Auxiliary Building Ventilation, 2.3.3.11 Control Building Ventilation, and 2.3.3.12 Emergency Diesel Generator Building Ventilation of the LRA.

Should you have any further questions, please contact Liz Thompson at (305)246-6921.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. J. Hovey', with a horizontal line extending to the right from the end of the signature.

R. J. Hovey
Vice President - Turkey Point

RJH/EAT/hlo

Attachment

A084

cc: U.S. Nuclear Regulatory Commission, Washington, D.C.

Chief, License Renewal and Standardization Branch
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Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

Response to Request for Additional Information for the Review of
the Turkey Point, Units 3 and 4, License Renewal Application

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 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.

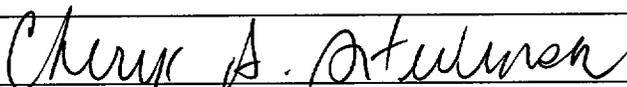


R. J. Hovey

Subscribed and sworn to before me this

19th day of January, 2001.

CHERYL A. STEVENSON
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # CC929876
EXPIRES 6/19/2004
BONDED THRU ASA 1-688-NOTARY1



Name of Notary Public (Type or Print)

R. J. Hovey is personally known to me.

ATTACHMENT 1
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
DATED DECEMBER 22, 2000 FOR THE REVIEW OF THE
TURKEY POINT, UNITS 3 AND 4,
LICENSE RENEWAL APPLICATION

Section 2.3.2.10 **Auxiliary Building Ventilation**

RAI 2.3.3.10-1:

In the Turkey Point, Units 3 and 4 license renewal application (LRA) Table 3.4-10 "Auxiliary Building and Electrical Equipment Room Ventilation," several component categories e.g., housings for dampers, diffusers, fans, and exhaust hoods, louvers, sealant materials, and bird screen for plant stack, if provided, are not included within the scope of license renewal (LR) or subject to an aging management review (AMR) program. Provide justification for their exclusion.

FPL RESPONSE:

Auxiliary Building and Electrical Equipment Room Ventilation fans and dampers, including their housings, were evaluated to determine whether these components should be included in an aging management review. The evaluation determined that several of these components, e.g. the Auxiliary Building Supply and Exhaust fans and their associated dampers, support license renewal system intended functions that satisfy the scoping criteria in 10 CFR 54.4 and are within the scope of license renewal. However, fans and dampers were determined to be active components and not subject to an aging management review consistent with 10 CFR 54.21(a)(1)(i) and the guidance of NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Revision 2, Appendix B.

There is one louver (Auxiliary Building Penthouse filter louver) and two exhaust hoods (Radioactive and Cold Chemistry laboratories) associated with the Auxiliary Building Ventilation system. These components were evaluated and determined not to be within the scope of license renewal because they do not support any license renewal system intended functions that satisfy the scoping criteria in 10 CFR 54.4. Diffusers are installed at the supply duct outlets. However, they do not perform any license renewal system intended functions; therefore, diffusers do not require an aging management review.

Sealant materials in the scope of license renewal are addressed as structural components and require an aging management review as described in subsection 3.6.2.4 (page 3.6-42) and listed in Table 3.6-3 (page 3.6-58) of the LRA.

There are no bird screens associated with the plant vent stack.

RAI 2.3.3.10-2:

Drawing No. 0-ABVAC-01, "Auxiliary Building Ventilation," excludes exhaust ductwork as follows from the scope of LR and an AMR program. Provide justification for its exclusion:

Exhaust ductwork:

- Ductwork from dampers MO-3419 and MO-3420 to plant stack, [A2 and C2].
- Ductwork containment purge, radwaste building, Unit 4 spent fuel pool (SFP) and new fuel storage area to plant stack, [A4 and B4].

FPL RESPONSE:

As described in subsection 2.3.3.10 (page 2.3-29) of the LRA, the license renewal system intended function of Auxiliary Building Ventilation is to provide adequate heat removal to ensure proper operation of safety related equipment in the Auxiliary Building. The pressure boundary of the ventilation system within the Auxiliary Building is relied upon to exhaust the ventilation air out of the building. The pressure boundary of the ductwork outside the Auxiliary building (exhaust ductwork from dampers MO-3419 and MO-3420 to plant stack, [A2 and C2]) is not required to support the license renewal system intended function and therefore does not meet the scoping criteria of 10 CFR 54.4 and is not in the scope of license renewal.

The Radwaste Building and the Unit 4 Spent Fuel Pool and New Fuel Storage Area Ventilation systems, including the ductwork to the plant vent stack, do not support any license renewal system intended functions that satisfy the scoping criteria of 10 CFR 54.4. Therefore, these systems (including exhaust ductwork to the plant vent stack) are not within the scope of license renewal as shown in Table 2.2-1 (page 2.2-2) of the LRA. The only license renewal intended function for Containment Purge is containment isolation as described in subsection 2.3.2.3 (page 2.3-15) of the LRA (see drawings 3-CP-01 and 4-CP-01). Therefore, the exhaust ductwork from the outboard containment isolation valves to the plant vent stack is not within the scope of license renewal and does not require an aging management review.

Section 2.3.2.11 **Control Building Ventilation**

RAI 2.3.3.11-1:

In the Turkey Point, Units 3 and 4 license renewal application (LRA) Table 3.4-11 "Control Building Ventilation," several component categories e.g., housings for dampers, diffusers, fans, and exhaust hoods, louvers, and sealant materials, are not included within the scope of license renewal (LR) or subject to an aging management review (AMR) program. Provide justification for their exclusion.

FPL RESPONSE:

Control Building Ventilation fans and dampers, including their housings, were evaluated to determine whether these components should be included in an aging management review. The evaluation determined that several of these components e.g. the Control Room Supply fans and their associated dampers, support license renewal system intended functions that satisfy the scoping criteria of 10 CFR 54.4 and are within the scope of license renewal. However, fans and dampers were determined to be active components and not subject to an aging management review consistent with 10 CFR 54.21(a)(1)(i) and the guidance in NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Revision 2, Appendix B.

Control Building Ventilation does not include any exhaust hoods or louvers (see drawing 0-CBVAC-01). Diffusers are installed at the supply duct outlets. However, they do not perform any license renewal system intended functions; therefore, diffusers do not require an aging management review.

Sealant materials in the scope of license renewal are addressed as structural components and require an aging management review as described in subsection 3.6.2.4 (page 3.6-42) and listed in Table 3.6-5 (page 3.6-66) of the LRA.

RAI 2.3.3.11-2:

Clarify whether sealant materials at Turkey Point, Units 3 and 4 used to maintain the main control room envelope (MCRE) at positive pressure with respect to the adjacent areas in order to prevent the unfiltered inleakages inside MCRE, are included in the scope of LR and subject to an AMR, and if so, provide the relevant information to complete Table 3.4-11 of the LRA. If the sealants are not considered subject to an AMR, provide justification for their exclusion.

FPL RESPONSE:

Sealant materials are used to maintain the main control room at positive pressure with respect to adjacent areas. These sealant materials are included within the scope of license renewal as structural components and subject to an aging management review. These sealant materials are described in subsection 3.6.2.4 and listed in Tables 3.6-5 (page 3.6-66) and 3.6-12 (page 3-6-81) of the LRA.

RAI 2.3.3.11-3:

Describe the areas that constitute the MCRE. Verify that all control room ventilation system (CRVS) components (including air handling units and fan coil units with their associated ductwork, and control valves, air intake, and exhaust fan with purge ductwork inside MCRE) which are relied on to perform the safety related cooling and filtration functions (in order to maintain control room habitability (CRH) and meet General Design Criterion (GDC) 19 requirements) are identified to be within the scope of LR and subject to an AMR on Drawing Nos. 0-CBVAC-01, 0-CBVAC-02, and 0-CBVAC-03 and in Table 3.4-11 of the LRA. If a component is not considered subject to an AMR, provide justification for its exclusion.

FPL RESPONSE:

The MCRE consists of the Control Room, including the Control Room offices, rack area, kitchen, and lavatory, and the Mechanical Equipment Room as shown on drawing 0-CBVAC-01. Both rooms are considered part of the envelope because both are serviced and pressurized by the Control Room ventilation air handlers through common ductwork. The boundaries of the envelope are the floors, walls, ceilings, dampers, doors, penetration seals and ductwork of the two rooms.

All CRVS components required to maintain CRH are within the scope of license renewal and include air handling units, condensing units, ductwork, supply fans, recirculation filters, dampers and supports. Of these components, those which require an aging management review are listed in Table 3.4.11 (page 3.4-58) of the LRA except supports for HVAC equipment, which are addressed in Table 3.6-5 (page 3.6-66) of the LRA. The justification for the components which do not require an aging management review is provided below:

- Fans and dampers were determined to be active components and not subject to an aging management review consistent with 10 CFR 54.21(a)(1)(i) and the guidance of NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Revision 2, Appendix B.
- Filter elements do not require an aging management review because they are replaced based on performance testing, and therefore are not considered to be long-lived in accordance with NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," Revision 2, and in accordance with the NRC resolution of License Renewal Issue No. 98-12, "Consumables" (NRC Letter C. I. Grimes to D. J. Walters (NEI), dated March 10, 2000).

- The condensing units are self-contained packaged units, which are replaced in total when necessary. Therefore, these units are considered to be active components and as such are not subject to an aging management review.

Drawings 0-CBVAC-02 & 0-CBVAC-03 are for the Computer and Cable Spreading Room HVAC and the DC Equipment/Inverter Rooms HVAC, respectively and do not show equipment required for control room habitability.

RAI 2.3.3.11-4:

Drawing No. 0-CBVAC-01 of the LRA, "Control Building Ventilation Control Room HVAC," does not highlight the exhaust damper (D-19) with the associated housing and ductwork [B5] as part of the LR scope. Provide justification for its exclusion.

FPL RESPONSE:

Exhaust damper D-19 is not required to maintain the MCRE. Automatic isolation of the upstream damper D-14 provides for maintaining the MCRE, and hence the license renewal boundary is established at D-14.

RAI 2.3.3.11-5:

The exhaust fan housings and associated ductwork for the battery rooms were not highlighted in Drawing No. 0-CBVAC-03 of the LRA, "Control Building Ventilation DC Equipment/Inverter Rooms HVAC," [A4 through A5] in the LR scope or in an AMR program. Provide justification for their exclusion.

FPL RESPONSE:

As described in Section 9.9.2 of the Turkey Point UFSAR, the DC Equipment/Inverter Room HVAC provides cooling to the equipment in the inverter rooms, the DC equipment rooms and the battery rooms. The battery rooms roof ventilators supplement the DC Equipment/Inverter Room HVAC to improve the ambient conditions in the battery rooms, but are not relied upon to maintain the temperatures in a range compatible with equipment operation. Therefore, the battery roof ventilators are not required to support the license renewal system intended function and are not within the scope of license renewal.

Section 2.3.2.12 **Emergency Diesel Generator Building Ventilation**

RAI 2.3.3.12-1:

The housings for the exhaust (vent) fans, associated dampers and ductwork, and hoods for the diesel generator rooms (4A/B) and diesel oil transfer rooms (4A/B) were not highlighted in Drawing No. 4-EDVAC-01 of the LRA, "Emergency Diesel Generator Building HVAC." Also, these component categories were not listed in Table 3.4-12, "Emergency Diesel Generator Building Ventilation." Provide justification for their exclusion.

FPL RESPONSE:

The license renewal boundary drawings depict mechanical pressure boundaries within the scope of license renewal. The ventilation fans and associated dampers and ductwork in the diesel generator rooms (4A/B) and diesel oil transfer rooms (4A/B) are classified non-safety related and are not relied upon to perform or support any license renewal system intended function. Adequate ventilation for the diesel oil transfer rooms is provided by natural circulation. Safety related ventilation for the 4A and 4B diesel generator rooms is provided by the diesel generator radiator fans which are evaluated as part of the Emergency Diesel Generators and support systems described in subsection 2.3.3.15 (page 2.3- 35) of the LRA.