



L-2001-33

FEB 16 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 January 17, 2001, 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 associated with Subsection 2.3.3.8, Instrument Air, Subsection 2.4.2.8, Emergency Diesel Generator Buildings, and Subsection 2.4.2.10, Fire Rated Assemblies of the LRA.

Should you have any further questions, please contact E. A. 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 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
Project Manager - Turkey Point License Renewal
Project Manager - Turkey Point

U.S. Nuclear Regulatory Commission, Region II

Regional Administrator, Region II, USNRC
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Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

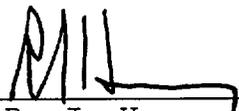
Response to Request for Additional Information for the Review of
the Turkey Point, Units 3 and 4, License Renewal Application

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

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

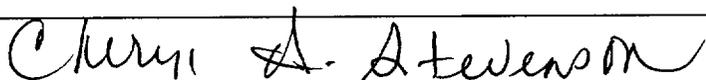
That he is Vice President - Turkey Point of Florida Power and
Light Company, the Licensee herein;

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
16th day of February, 2001.



Name of Notary Public (Type or Print)

R. J. Hovey is personally known to me.

CHERYL A. STEVENSON
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # CC929876
EXPIRES 6/19/2004
BONDED THRU ASA 1-200-NOTARY1

ATTACHMENT 1
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
DATED JANUARY 17, 2001 FOR THE REVIEW OF THE
TURKEY POINT UNITS 3 AND 4,
LICENSE RENEWAL APPLICATION

SUBSECTION 2.4.2.8 EMERGENCY DIESEL GENERATOR BUILDINGS

RAI 2.4.2.8-1:

The discussion of emergency diesel generators on pages 5E-4 and 5E-5 in the UFSAR Appendix 5E - Missile Protection Criteria, states that several safety related components, including the Unit 3 EDG fuel oil storage tank, associated solenoid valves, both Unit 3 diesel fuel transfer pumps, and associated piping are not missile protected. It further states that if the transfer pumps become non-functional due to external missile damage, the fuel oil day tanks contain sufficient inventory to allow operation of the Unit 3 EDGs until a mobile fuel oil tank could supply additional fuel oil to the EDGs. It is also possible to cross-connect the Unit 4 transfer pumps and diesel fuel storage tanks to the Unit 3 EDG day tanks. However, according to the drawings submitted with the LRA (3-EDG-03 and 4-EDG-03), neither the truck fill piping nor the Unit 4 cross-tie piping are safety related (labeled as quality group D on the drawing). Thus, it could be postulated that a design basis tornado could damage enough equipment to preclude supplying additional fuel to the Unit 3 EDGs. Estimating that a Unit 3 EDG loaded at 1000 kW uses about 75 gallons of fuel per hour, there is enough fuel in the skid tank (275 gal) and the day tank (4,000 gal) for approximately 56 hours. Following a major storm, the EDG may need to run for a much longer period of time. Please provide the basis for excluding the equipment and piping described above from the scope of license renewal.

FPL RESPONSE:

Each Unit 3 Diesel Oil Day Tank has an alternate fill connection, as described in Section 9.15.1.2.1.3 of the UFSAR, (see drawings 3-EDG-03 and 3-EDG-04, coordinate F-5) which can be used to fill the Diesel Oil Day tanks from a mobile fuel oil tank unit in the unlikely event the normal fill path is unavailable. These alternate Diesel Oil Day Tank fuel oil fill connections satisfy the missile protection criteria of the Turkey Point Units 3 and 4 FSAR, Appendix 5E, and should be included in the scope of license renewal since they are relied upon to insure a supply of fuel oil for operation of the Unit 3 EDGs in the unlikely event that a tornado missile disables the normal oil supply. License renewal boundary drawings 3-EDG-03 and 3-EDG-04 should show the Diesel Oil Day Tank alternate fill lines, including valves 3-70-245, 246, 247, 248, 249

and 250 and associated piping and fittings, within the scope of license renewal.

Additional diesel fuel oil supply capability to the Unit 3 Diesel Oil Storage and Day Tanks is provided through a cross-connect line from Unit 4 EDG Diesel Oil Transfer and the normal and alternate truck fill connections as shown on drawing 3-EDG-03, coordinates B-7 and B-1. These alternate oil supply lines provide additional flexibility and redundancy and are used for diesel fuel oil fill and transfer during normal plant operation. However, these lines are not within the scope of license renewal because they do not perform or support any system intended functions that satisfy the scoping criteria of 10 CFR 54.4.

The aging management review for the Emergency Diesel Generators and Support systems, which includes the EDG Diesel Oil Day Tank alternate fill line components, is discussed in Section 3.4 of the LRA. The specific components that require an aging management review are listed in the LRA, Table 3.4-15 as follows:

- a) Page 3.4-84 for Carbon steel valves and piping/fittings with fuel oil and air/gas internal environments.
- b) Page 3.4-84 for stainless steel fittings (fill hose connection) with air/gas internal environment.
- c) Page 3.4-86 for carbon steel valves and piping fittings with outdoor and indoor - not air conditioned external environments.
- d) Page 3.4-86 for stainless steel fittings (fill hose connection) with outdoor external environment.

SUBSECTION 2.4.2.10 FIRE RATED ASSEMBLIES

RAI 2.4.2.10-1:

Fire rated assemblies include fire barriers (Thermo-lag), fire doors, fire dampers, penetration seals, and electrical conduit seals. Because of longstanding issues with Thermo-lag, the licensee has a corrective action program in place to restore all Thermo-lag barriers to comply with Appendix R, and is scheduled to have all corrective actions completed by December 31, 2001. Table 3.6-12 of the LRA indicates that Thermo-lag in an outdoor environment is subject to aging affects (loss of material) and will be managed under the Fire Protection Program (UFSAR Appendix 9.6A). However, Appendix 9.6A does not provide details on how the Thermo-lag fire barriers will be monitored or inspected for aging effects. Please explain how the restored Thermo-lag barriers will be monitored for aging effects.

FPL RESPONSE:

As described in Appendix B, Section 3.2.8 (page B-56) of the License Renewal Application, Thermo-lag fire barriers are visually inspected on a periodic basis utilizing administrative procedures to detect weathering degradation that could lead to the aging effect of loss of material. These visual inspections look for material degradation such as leaching, peeling and delamination that could result in loss of material.

RAI 2.4.2.10-2:

Fire assemblies are described in UFSAR Appendix 9.6A, Sections 3.11-3.15. Section 3.11.2.1a) states that "...Thermo-lag thickness per engineering design output" provides a fire barrier with a minimum fire rating of 3 hours. Since Thermo-lag in outdoor applications can suffer loss of material, is this loss of material taken into consideration when determining the correct amount of Thermo-lag to apply in order to provide a minimum fire rating of 3 hours for the extended life of the plant?

FPL RESPONSE:

Thermo-lag fire barrier materials are designed, tested and installed to meet the required fire rating. As described in Appendix B, Section 3.2.8 (page B-56) of the License Renewal Application, visual inspection of Thermo-lag in outdoor environments per the Fire Protection Program provides for early detection of any Thermo-lag weathering that could lead to loss of material, before the fire rating of the barrier is affected.

SUBSECTION 2.3.3.8 INSTRUMENT AIR

RAI 2.3.3.8-1:

LRA Drawing 4-IA-01 shows "Instrument Air Compressor No.4S" connected to the instrument air header. The instrument air header is identified as being within the scope of license renewal, but not the compressor and associated piping. There is no discussion of this compressor in the UFSAR Section 9.17. Please describe the function of compressor No. 4S and the basis for excluding the compressor and associated piping from the scope of license renewal.

FPL RESPONSE:

The 4S instrument air compressor was originally installed to increase available instrument air capacity for units 3 and 4. Subsequent to the 4S compressor installation, Instrument Air was upgraded to include two electric and two diesel compressors (3CM, 4CM, 3CD and 4CD) supplying both units.

The 4S instrument air compressor is no longer in use and has been identified for abandonment. Valve 4-40-775 is administratively tagged closed pending formal abandonment of this equipment.