



L-2001-113
10 CFR 54

MAY 3 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 March 23, 2001, FPL provided responses to Requests for Additional Information (RAIs) associated with Section 2.1, Scoping and Screening Methodology, and Subsections 2.3.1, Reactor Coolant Systems, 2.3.2.2, Containment Spray, 2.3.3.3, Spent Fuel Pool Cooling, 2.3.3.4, Chemical and Volume Control, 2.4.1, Containments, and 2.4.2.4, Cooling Water Canals of the Turkey Point Units 3 and 4 License Renewal Application (LRA). Based on review of our responses, the NRC requested additional information regarding FPL's response to RAI 2.1-2 related to "seismic II over I." Accordingly, Attachment 1 to this letter contains a supplemental response to RAI 2.1-2.

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 long horizontal line extending to the right.

R. J. Hovey
Vice President - Turkey Point

RJH/EAT/hlo

Attachment

Aool

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

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Project Manager - Turkey Point

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Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

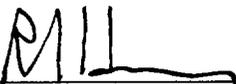
Response to Request for Additional Information for the Review of
the Turkey Point Units 3 and 4, License Renewal Application

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;

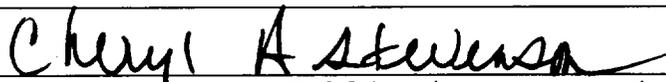
That he has executed the foregoing document; that the statements
made in this document are true and correct to the best of his
knowledge, information and belief, and that he is authorized to
execute the document on behalf of said Licensee.



R. J. Hovey

Subscribed and sworn to before me this
3rd day of May, 2001.

CHERYL A. STEVENSON
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # CC929876
EXPIRES 8/19/2004
BONDED THRU ASA 1-888-NOTARY



Name of Notary Public (Type or Print)

R. J. Hovey is personally known to me.

ATTACHMENT 1
SUPPLEMENTAL RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION 2.1-2 FOR THE REVIEW OF THE
TURKEY POINT UNITS 3 AND 4, LICENSE RENEWAL APPLICATION

RAI 2.1-2:

In Section 2.1.1.3 of the LRA, the applicant states that although Turkey Point Units 3 and 4 were not originally licensed for "seismic II over I" (i.e., consistent with the seismic criteria and guidance in RG 1.29, "Seismic Design Classification"), that "seismic II over I" was nonetheless "considered" for license renewal scoping.

The staff's position is that "Seismic II over I" piping systems, structures, and components whose failure could prevent safety-related systems and structures from accomplishing their intended functions are within the scope of license renewal. However, the staff recognizes that the criteria defining the term "seismic II over I" is bound by the CLB for each facility.

Therefore, the applicant is requested to submit the definition of the "seismic II over I" criteria considered by the applicant in preparing the LRA for Turkey Point Units 3 and 4, and the bases for the application of such criteria to satisfy 10 CFR 54.4(a)(2) requirements, consistent with the CLB of the facility.

In addition, clarify whether the scope of the systems discussed in Chapter 3 of the LRA includes any "Seismic II over I" piping. If so, clarify how the aging management programs for those piping systems, including their supports, have been addressed. Specifically, state whether the same aging management programs discussed in tables included in LRA Section 3 also apply to those "Seismic II over I" piping components.

FPL SUPPLEMENTAL RESPONSE:

At the public meetings between FPL and NRC staff on March 20, 2001, and between Southern Nuclear Company (SNC) and NRC staff on March 29, 2001, the NRC staff requested FPL to provide a discussion of other potential non-safety related/safety related interactions (flooding, spray, jet impingement, and pipe whip) in addition to "seismic II over I". Accordingly, the following is provided as a supplement to FPL's response to RAI 2.1-2 transmitted with letter L-2001-49 dated March 22, 2001.

As indicated in Subsection 2.1.1.3 (page 2.1-7) of the Turkey Point License Renewal Application (LRA), the Turkey Point Integrated Plant Assessment (IPA) methodology addressed the potential for non-safety related/safety related interactions. These interactions include flooding, spray, jet impingement, and pipe whip due to postulated failures of non-safety related piping, and these interactions are explicitly addressed in the Turkey Point Current Licensing Basis (CLB).

With regard to flooding due to postulated failures of non-safety related piping, Appendix 5F of the Turkey Point UFSAR discusses internal flooding protection. As indicated in Section 5F-1 of this appendix, FPL performed reviews of the susceptibility of safety-related systems to flooding from failure of non-Category I (seismic) systems. These reviews considered failure of non-Category I (seismic) systems or components simultaneous with a loss of offsite power. Appendix 5F also indicates that the NRC issued a Safety Evaluation Report dated September 4, 1979, which concluded that a sufficient level of protection from flooding due to postulated failure of non-Category I (seismic) systems for equipment important to safety is provided. Since failure of the non-safety related piping is assumed in the flooding evaluation, the piping does not fall within the scope of license renewal. However, the design features required to accommodate the effects of flooding (i.e., curbing, platforms, sumps, and sump pumps) are included in the scope of license renewal. Sump pumps included in the scope of license renewal for flood protection are identified on LRA Table 3.4-7 (page 3.4-41). Structural components included in the scope of license renewal for flood protection are identified with intended function 8 (see LRA Table 3.6-1 on page 3.6-49) in Tables 3.6-2 (page 3.6-50) through 3.6-20 (page 3.6-103).

For spray, jet impingement, and pipe whip effects due to postulated failures of non-safety related piping, protection of safety related systems is provided by the use of pipe whip restraints and internal barriers (see Turkey Point UFSAR Section 5.4). Similar to the flooding evaluation, failure of the non-safety related piping is assumed, therefore, the piping does not fall within the scope of license renewal. However, the design features required to accommodate the effects of spray, jet impingement, and pipe whip (i.e., pipe whip restraints and internal barriers) are included in the scope of license renewal. Structural components included in the scope of license renewal for spray, jet impingement, and pipe whip effects are identified with intended function 11 (see LRA Table 3.6-1 on page 3.6-49) in Tables 3.6-2 (page 3.6-50) through 3.6-20 (page 3.6-103).

In the case of "seismic II over I", or the potential for non-safety related piping to fall and prevent a safety function, FPL's review of the Turkey Point CLB and seismic capability of non-safety related piping systems concluded that non-safety related piping must be supported in a manner to prevent it from falling on safety related components. Thus, the pipe supports for this piping were included within the scope of license renewal. This review also concluded, however, that the piping did not fall within the scope of license renewal (see FPL's response to RAI 2.1-2 transmitted with letter L-2001-49 dated March 22, 2001). At the SNC and NRC public meeting on March 29, 2001, the following points were made:

- No experience data exists of welded steel pipe segments falling due to a strong motion earthquake
- Falling of a piping system is extremely rare and only occurs when there is a failure or unzipping of the supports
- These observations apply to new or aged pipe

These points are supported by EPRI document EPRI NP-6041-SL, NUREG CR-6239, and statements made at the March 29, 2001 meeting by Dr. John D. Stevenson, (a recognized industry expert on seismic design) who also was involved with the Turkey Point Generic Safety Issue (GSI) A-46 evaluation. Accordingly, falling of non-safety related piping segments should not be considered, and postulation of such an event is hypothetical and not supported by empirical evidence.

Based on the above, the consequences of postulated failures of non-safety related piping on safety related functions are accommodated by the Turkey Point design, and these design considerations were appropriately addressed in license renewal scoping. Thus, FPL maintains that "seismic II over I" piping segments do not perform an intended function defined by 10 CFR 54.4(a)(2), and therefore are not within the scope of license renewal.