



JUL 18 2001

L-2001-162  
10 CFR 54

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

By letter dated January 19, 2001 (L-2001-15), FPL provided responses to 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. Based on the review of our responses, the NRC requested additional information regarding FPL's responses to RAIs 2.3.3.10-1, 2.3.3.11-1, 2.3.3.11-3, and 2.3.3.12-1 related to these ventilation systems. Accordingly, Attachment 1 to this letter contains supplemental responses to these four RAIs.

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 to the right from the end of the signature.

R. J. Hovey  
Vice President - Turkey Point

RJH/EAT/hlo

Attachment

A001

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

18<sup>th</sup> day of July, 2001.

Olga Hanek  
\_\_\_\_\_

Olga Hanek  
\_\_\_\_\_  
Name of Notary Public (Type or Print)



R. J. Hovey is personally known to me.

**ATTACHMENT 1  
SUPPLEMENTAL RESPONSE TO  
REQUESTS FOR ADDITIONAL INFORMATION,  
TURKEY POINT UNITS 3 AND 4,  
LICENSE RENEWAL APPLICATION**

**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 SUPPLEMENTAL RESPONSE:**

The response below supercedes the response to RAI 2.3.3.10-1 transmitted in FPL letter L-2001-15 dated January 19, 2001. This response is being revised to specifically address housings for dampers, fans, and condensing units. The revised response is provided below.

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. 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 54 - The License Renewal Rule," Revision 2, Appendix B. However, in response to NRC Draft Open Item 2.3.3.10-1, housings for dampers and fans have been included in the aging management review for the Auxiliary Building and Electrical Equipment Room Ventilation. Changes to Table 3.4-10 as a result of the above are as follows:

**TABLE 3.4-10  
AUXILIARY BUILDING AND ELECTRICAL EQUIPMENT ROOM VENTILATION**

Component/ Commodity Grouping	Intended Function	Material	Environment	Aging Effects Requiring Management	Program/ Activity
<b>Internal Environment</b>					
Auxiliary building ventilation supply and exhaust fan housings	Pressure boundary	Carbon steel	Air/gas	Loss of material	Systems and Structures Monitoring Program
Damper housings	Pressure boundary	Carbon steel	Air/gas	Loss of material	Systems and Structures Monitoring Program
<b>External Environment</b>					
Auxiliary building ventilation supply fan housings	Pressure boundary	Carbon steel	Outdoor	Loss of material	Systems and Structures Monitoring Program
Auxiliary building ventilation exhaust fan housings	Pressure boundary	Carbon steel	Indoor - not air conditioned	Loss of material	Systems and Structures Monitoring Program
Damper housings	Pressure boundary	Carbon steel	Indoor - not air conditioned	Loss of material	Systems and Structures Monitoring Program

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 are not safety related and 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 are not safety related and 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 and listed in Table 3.6-3 of the LRA.

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

**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 SUPPLEMENTAL RESPONSE:**

The response below supercedes the response to RAI 2.3.3.11-1 transmitted in FPL letter L-2001-15 dated January 19, 2001. This response is being revised to specifically address housings for dampers, fans, chillers, and condensing units. The revised response is provided below.

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. 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 54 - The License Renewal Rule," Revision 2, Appendix B. However, in response to NRC Draft Open Item 2.3.3.11-1, housings for dampers and fans have been included in the aging management review for Control Building Ventilation. Changes to Table 3.4-11 as a result of the above are as follows:

**TABLE 3.4-11  
CONTROL BUILDING VENTILATION**

<b>Component/ Commodity Grouping</b>	<b>Intended Function</b>	<b>Material</b>	<b>Environment</b>	<b>Aging Effects Requiring Management</b>	<b>Program/ Activity</b>
<b>Internal Environment</b>					
Control room recirculation supply fan housings	Pressure boundary	Carbon steel	Air/gas	None	None required
Damper housings	Pressure boundary	Carbon steel-galvanized	Air/gas	None	None required
<b>External Environment</b>					
Control room recirculation supply fan housings	Pressure boundary	Carbon steel	Indoor - air conditioned	None	None required
Damper housings	Pressure boundary	Carbon steel - galvanized	Outdoor Indoor - air conditioned	None	None required

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 are not safety related and 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 and listed in Table 3.6-5 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 SUPPLEMENTAL RESPONSE:**

The response below supercedes the response to RAI 2.3.3.11-3 transmitted in FPL letter L-2001-15 dated January 19, 2001. This response is being revised to specifically address housings for chillers. The revised response is provided below.

The Main Control Room Envelope 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 Control Room Ventilation System components required to maintain control room habitability 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 of the LRA except supports for HVAC equipment, which are addressed in Table 3.6-5 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 54 - The License Renewal Rule," Revision 2, Appendix B. However, in response to NRC Draft Open Item 2.3.3.11-1, housings for dampers and fans have been included in the aging management review for Control Building Ventilation. Changes to Table

3.4-11 are provided in the supplemental response to RAI 2.3.3.11-1.

- 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 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. However, in response to NRC Draft Open Item 2.3.3.11-2, housings for condensing units have been included in the aging management review for Control Building Ventilation. Changes to Table 3.4-11 as a result of the above are as follows:

**TABLE 3.4-11  
CONTROL BUILDING VENTILATION**

<b>Component/ Commodity Grouping</b>	<b>Intended Function</b>	<b>Material</b>	<b>Environment</b>	<b>Aging Effects Requiring Management</b>	<b>Program/ Activity</b>
<b>Internal Environment</b>					
Condensing unit housings	Pressure boundary	Carbon steel	Air/gas	Loss of material	Systems and Structures Monitoring Program
<b>External Environment</b>					
Condensing unit housings	Pressure boundary	Carbon steel	Outdoor	Loss of material	Systems and Structures Monitoring Program

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 2.3.3.12-1:**

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 SUPPLEMENTAL RESPONSE:**

The response below supercedes the response to RAI 2.3.3.12-1 transmitted in FPL letter L-2001-15 dated January 19, 2001. This response is being revised to include hoods. The revised response is provided below.

The license renewal boundary drawings depict mechanical pressure boundaries within the scope of license renewal. The ventilation fans and associated dampers, hoods 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 functions. 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 of the LRA.