

September 30, 1986

Docket Nos. 50-250
and 50-251

Mr. C. O. Woody, Group Vice President
Nuclear Energy Department
Florida Power and Light
Post Office Box 1400
Juno Beach, Florida 33408

Dear Mr. Woody:

Subject: Modification of Commission Order Dated July 15, 1985

Reference: TAC Numbers 62182 and 62183

The Nuclear Regulatory Commission's (NRC) Order of February 23, 1984, relating to the Turkey Point Plant, confirmed your commitments to implement those post-TMI related items set forth in Supplement 1 to NUREG-0737 which included Regulatory Guide (RG) 1.97 requirements. Section IV of the Order allows for extensions of time for completing items detailed in the Order for good cause shown.

By letter dated May 10, 1985, you modified the implementation schedules confirmed by that Order. By Order dated July 15, 1985, the Commission confirmed the modified implementation schedules which indicated that implementation of the RG 1.97 requirements for Unit 4 would be completed by the end of Cycle 11 refueling which was completed in early September of this year. Your letter dated August 15, 1986, indicated that the wide range Excore Neutron Detection system requires calibration at 100% power. You further indicated that this calibration would be completed within 14 days of achieving steady state 100% power operation. The time at power is required to allow core parameters to stabilize prior to the calibration.

In addition, your letters dated May 10, 1985, and December 31, 1985, indicated that the details and schedules for replacement of the Area Radiation Monitoring (ARM) System would be provided after startup of Unit 4 from the Cycle 11 refueling outage. Your letter of January 26, 1984, provided an evaluation report that updated your submittal from the requirements of RG 1.97, Revision 2, to the requirements of Revision 3. This update included Item E2, Area Radiation - Radiation Exposure Rate, which is provided by the ARM system. You indicated that the existing ARM system had a range of 10^{-1} to 10^3 MR/HR which was less than the required range of 10^{-1} to 10^4 . Your justification for the reduced range was:

"Range does not comply; however, fixed area radiation monitors located at areas important to safety will not be useful to an operator carrying a portable high range area detector on the trip to, at, or from the area important to safety."

DISTRIBUTION

Docket File	E. Jordan
NRC PDR	B. Grimes
Local PDR	J. Partlow
PAD#2 Rdg	N. Thompson
H. Denton/R. Vollmer	
T. Novak	T. Barghart (8)
C. Rossi	ACRS (10)
ORAS	OPA
D. Miller	SECY
D. McDonald	LFMB
OGC-Bethesda	Gray File

B610140080 860930
PDR ADOCK 05000250
P PDR

Your evaluation did not recognize that the qualification requirement for radiation monitors had changed from qualified to non-qualified instruments. The NRC staff's safety evaluation dated March 4, 1985, of your submittal addressing the implementation of instrumentation systems for RG 1.97, Revision 3, did not accept the justification provided for the reduced range of your installed non-qualified ARM system.

Your May 10, 1985, letter accepted the recommendations of the staff. For Item E2, you committed to install a new qualified area radiation monitoring system and indicated that you would provide the schedule for installing this system.

The Commission's July 15, 1985, Order was based on your schedules provided in the May 10, 1985, letter. However, the Order did not include the exception for the new ARM system implementation. Your December 31, 1985, letter requested an extension for providing an implementation schedule. Numerous problems, including procurement and delivery of system components, have been identified in obtaining a qualified ARM system. Bechtel Corporation, your contractor, also identified the change in the requirements of RG 1.97 from qualified to non-qualified instruments.

Your August 15, 1986, letter requests that the Order dated July 15, 1985, be modified to allow FPL to provide a schedule for the implementation of a non-qualified new ARM system (Item E2) by December 31, 1986.

Turkey Point Nuclear Plant, Units 3 and 4, have an installed non-qualified system that provides direct readout in the control room with an existing range of 10^{-1} to 10^3 MR/HR. This system will remain in operation until the new system has been declared operational. The installed system provides continuous readout through meters located in the control room. Operators would relay such information to the emergency response facilities via telephone links or manual entry into the Safety Assessment System (SAS) computers.

The staff has determined that you have provided a sound rationale for the needed schedular relief for the wide range Excore Neutron Detection System and the ARM system; a best effort is being expended to complete RG 1.97 requirements; you have proceeded expeditiously to meet the requirements; delays caused were beyond your control; and the short duration required for the calibration of the excore detectors and the use of the existing ARM system in the interim time support the schedular extension. Therefore, based on our evaluation, the staff has concluded that in accordance with Section V of the Commission's Order of July 15, 1985, the schedule for completion of these items is modified as follows:

Mr. C. O. Woody

- 3 -

The wide range Excore Neutron Detection System shall be calibrated within 14 days of achieving steady state 100% power operation for Unit 4 after startup from the current refueling outage.

An implementation schedule for the new non-qualified ARM system which will be capable of meeting the ranges specified in RG 1.97 shall be provided by December 31, 1986.

Sincerely,

Thomas M. Novak, Acting Director
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

cc: See next page

* See previous concurrence

*
LA:PAD#2
DMiller
9/12/86

*
PM:PAD#2
DMcDonald:hc
9/12/86

*
PD:PAD#2
LRubenstein
9/18/86

*
OGC
SRurns
9/24/86

13c-9/30
AD:PLA
TNovak
9/30/86

Mr. C. O. Woody

- 3 -

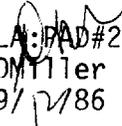
The wide range Excore Neutron Detection System shall be calibrated within 14 days of achieving steady state 100% power operation for Unit 4 after startup from the current refueling outage.

An implementation schedule for the new non-qualified ARM system which will be capable of meeting the ranges specified in RG 1.97 be provided by December 31, 1986.

Sincerely,

Thomas M. Novak, Acting Director
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

cc: See next page


LA:PAD#2
DMiller
9/21/86


DMcDonald:hc
9/21/86


LRubenstein
9/18/86


OGC
SBurns
9/24/86
AD:DPLA
TNovak
9/ /86

Mr. C. O. Woody
Florida Power and Light Company

Turkey Point Plant

cc:

Harold F. Reis, Esquire
Newman and Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

Administrator
Department of Environmental
Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

Mr. Jack Shreve
Office of the Public Counsel
Room 4, Holland Building
Tallahassee, Florida 32304

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
Suite 2900
101 Marietta Street
Atlanta, Georgia 30323

Norman A. Coll, Esquire
Steel, Hector and Davis
4000 Southeast Financial
Center
Miami, Florida 33131-2398

Martin H. Hodder, Esquire
1131 NE, 86th Street
Miami, Florida 33138

Mr. C. M. Wethy, Vice President
Turkey Point Nuclear Plant
Florida Power and Light Company
P.O. Box 029100
Miami, Florida 33102

Joette Lorion
7269 SW, 54 Avenue
Miami, Florida 33143

Mr. M. R. Stierheim
County Manager of Metropolitan
Dade County
Miami, Florida 33130

Mr. Chris J. Baker, Plant Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
P.O. Box 029100
Miami, Florida 33102

Resident Inspector
U.S. Nuclear Regulatory Commission
Turkey Point Nuclear Generating Station
Post Office Box 57-1185
Miami, Florida 33257-1185

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Mr. Allan Schubert, Manager
Office of Radiation Control
Department of Health and
Rehabilitative Services
1317 Winewood Blvd.
Tallahassee, Florida 32301

Intergovernmental Coordination
and Review
Office of Planning & Budget
Executive Office of the Governor
The Capitol Building
Tallahassee, Florida 32301