

February 26, 1985

Docket Nos. 50-250  
and 50-251

Mr. J. W. Williams, Jr., Vice President  
Nuclear Energy Department  
Florida Power and Light Company  
Post Office Box 14000  
Juno Beach, Florida 33408

<u>Distribution</u>	Docket file
NRC PDR	LPDR
ORB#1 RDG	Gray file (4)
HThompson	CParrish
DMcDonald	EJordan
PMcKee	OELD
ACRS (10)	DBrinkman
TBarnhart (8)	JPartlow
WJones	OPA, CMiles
RDiggs	

Dear Mr. Williams:

Reference: TAC Nos. 56805 and 56808

SUBJECT: SPENT FUEL STORAGE FACILITY EXPANSION

*Posted  
Bases Change to  
SER Supporting Amat.  
105 to DPR-41*

By letter dated November 21, 1984, the Commission issued Amendment No. 111 to Facility Operating License No. DPR-31 and Amendment No. 105 to Facility Operating License No. DPR-41 for the Turkey Point Plant Units 3 and 4, respectively, which allowed expansion of the spent fuel storage facilities. Copies of the supporting Safety Evaluation and Notice of Issuance and Final Determination of No Significant Hazards Consideration were also enclosed. The Safety Evaluation (SE) and the appended Technical Evaluation Report (TER) provided the basis for our issuance of the requested amendments. Sections 2.3.4 and 2.3.5 of the SE and the appended TER indicated that postulated loads from a seismic event will not result in failures to the racks or pool structures, thus their integrity will be maintained. As indicated in Section 3.3.4 of the TER, there would be no lift-off of the rack modules from the pool liner during a seismic event. This conclusion was based on your September 28, 1984, letter which provided the results of the Westinghouse analysis.

By letter dated February 1, 1985, you indicate that Westinghouse informed you, subsequent to your September 28, 1984 letter, that administrative controls on fuel loading are required for racks whose outer rows overhang the support pads in order to be consistent with an assumption by Westinghouse during its analysis. That is, the outer (overhanging) rows would not be fully loaded while the remaining portion of the rack module is empty.

The NRC staff's SE and the supporting TER conclusions have remained valid due to the administrative controls initiated when you became aware of the potential need for the controls. These controls, which were prior to any fuel loading in the affected racks, preclude the possibility of any lift-off.

Your February 1, 1985, letter requested that we review the information provided as the result of a reanalysis of fuel racks with only overhanging rows loaded with fuel which indicates the worse case lift-off is less than 0.2 inches during a seismic event and this minimal lift-off will not result in failures to the racks or pool structures and their integrity will be maintained regardless of the loading pattern.

Mr. Williams

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February 26, 1985

This request for our review of the reanalysis represents a change in a basis supporting the above referenced amendments as documented in the supporting Safety Evaluation. 10 CFR 50.59, "Changes tests and experiments," indicates that licensee's may make changes, conduct tests or experiments not described in the Safety Analysis Report without prior Commission approval unless the proposed change, test or experiment involves a change in the technical specifications incorporated in the license or an unreviewed safety question.

It is not clear from your submittal whether you have performed a 50.59 review and documented the results in accordance with the provisions of 50.59(a) and (b) or; that you have determined that the reanalysis requires a change in the technical specifications incorporated in the licenses or that the change represents an unreviewed safety question.

If you have performed a 50.59 review in accordance with the provisions of 50.59(a) and (b) and determined that neither an explicit technical specification change nor an unreviewed safety question is involved, you do not need our prior approval and your request may be withdrawn. However, if you have determined a change in the technical specifications incorporated in the license or an unreviewed safety question exists, we request that your submittal be modified in accordance with 50.59(c) including a proposed Notice for public comment using the standards in 10 CFR 50.92 concerning the issue of no significant hazards consideration.

We will take no further action on this request until we receive clarification.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

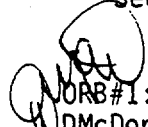
Sincerely,

/s/ DGMcDonald

Daniel G. McDonald, Project Manager  
Operating Reactors Branch #1  
Division of Licensing

\*See previous white for concurrences

ORB#1:DL \*  
CParrish  
02/26/85

  
ORB#1:DL  
DGMcDonald/ts  
02/26/85

BC-ORB#1:DL \* OELD\*  
SVarga  
02/26/85 02/26/85

Mr. Williams

-2-

This request for our review of the reanalysis represents a change in the design basis for the above referenced amendments as documented in the supporting Safety Evaluation. 10 CFR 50.59, "Changes tests and experiments," indicates that licensee's may make changes, conduct tests or experiments not described in the Safety Analysis Report without prior Commission approval unless the proposed change, test or experiment involves a change in the technical specifications incorporated in the license or an unreviewed safety question.

It is not clear from your submittal whether you have performed a 50.59 review and documented the results in accordance with the provisions of 50.59(a) and (b) or; that you have determined that the reanalysis requires a change in the technical specifications incorporated in the licenses or that the change represents an unreviewed safety question.

If you have performed a 50.59 review in accordance with the provisions of 50.59(a) and (b), you do not need our prior approval and your request may be withdrawn. However, if you have determined a change in the technical specifications incorporated in the license or an unreviewed safety question exists, we request that your submittal be modified in accordance with 50.59(c) including a proposed Notice for public comment using the standards in 10 CFR 50.92 concerning the issue of no significant hazards consideration.

We will take no further action on this request until we receive clarification.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Daniel G. McDonald, Project Manager  
Operating Reactors Branch #1  
Division of Licensing

Enclosure:  
~~As~~ Stated

cc w/enclosure:  
See next page

ORB#1:DL  
CParrish  
02/25/85

ORB#1:DL  
DMcDonald/ts  
02/26/85

BC-ORB#1:DL  
SVatuga  
02/26/85

OELD  
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02/26/85

*Unintended  
reversion*

J. W. Williams, Jr.  
Florida Power and Light Company

Turkey Point Plants  
Units 3 and 4

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