



L-2001-234  
10 CFR 54

OCT 22 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  
Annual Update to the Turkey Point Units 3 and 4  
License Renewal Application

By Florida Power & Light Company (FPL) letter L-2000-177 dated September 8, 2000, FPL submitted an Application for Renewed Operating Licenses for Turkey Point Units 3 and 4 (LRA) which provided information required by 10 CFR Part 54. During the NRC review of the LRA, FPL is required by 10 CFR 54.21(b) to report changes to the current licensing basis (CLB) that materially affect the contents of the Turkey Point Units 3 and 4 LRA, including the FSAR supplement.

In accordance with the requirements of 10 CFR 54.21(b), FPL has completed a review of facility changes since the submittal of the Turkey Point LRA. The only CLB change that materially affects the LRA is as follows:

By FPL letter L-2001-114 dated June 18, 2001, FPL notified the NRC that it had completed all commitments in response to Generic Letter 92-08 "Thermo-lag 330-1 Fire Barriers." The Fire Protection Monitoring Station was previously installed as a compensatory measure required until all Thermo-lag upgrades were completed. As a result of completing the commitments to the Generic Letter, the Fire Protection Monitoring Station is no longer within the scope of license renewal. Accordingly, FPL makes the following changes to the LRA associated with the Fire Protection Monitoring Station:

- Table 2.2-2, page 2.2-4, License Renewal Scoping Results For Structures - The column "Structure in License Renewal Scope" is "No" for the Fire Protection Monitoring Station. The column "Screening Results Application Subsection" is blank.

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- Subsection 2.4.2.9, pages 2.4-19 and 2.4-20, Fire Protection Monitoring Station - This subsection is deleted. This change to the LRA should be incorporated in the NRC Safety Evaluation Report (SER) Section 2.4.2.9, Fire Protection Monitoring Station.
- Subsection 3.6.2, page 3.6-27, Other Structures - The Fire Protection Monitoring Station is deleted from this list. This change to the LRA should be incorporated in SER Sections 3.6.2.4.1, Summary of Technical Information in the Application, and 3.6.2.4.2.1, Effects of Aging.
- Table 3.6-11, page 3.6-80, Fire Protection Monitoring Station - This table is deleted.
- Appendix B, Subsection 3.2.15, page B-83, Systems and Structures Monitoring Program - The Fire Protection Monitoring Station is deleted from this list. This change to the LRA should be incorporated in the SER Section 3.1.3.1, Summary of Technical Information in the Application.

In addition to the changes associates with the Fire Protection Monitoring Station, the response to NRC Request for Additional Information (RAI) 2.3.3.14-5, submitted by FPL letter L-2001-35 dated February 26, 2001, revised the LRA to include the following structures/components credited for fire protection in the scope of license renewal: gravel pits around the main and startup transformers, curbs around the lube oil reservoirs, and drip shields over Thermo-lag fire barriers.

During the license renewal regional inspections held the weeks of August 20-24, 2001, and September 10-14, 2001, the following clarifications to the Turkey Point LRA were identified:

- Cracking due to flaw growth was determined not to be an aging effect requiring management for the pressurizer support skirts and flanges. Based on the ASME Section XI criteria associated with the thickness of the pressurizer, the support skirt weld is located outside the area of interest. As a result, LRA Table 3.2-1, page 3.2-65, Reactor Coolant Systems - Pressurizers was revised to depict support skirt and flanges in a containment air environment as follows: aging effect requiring management - none; and program/activity - none required.

- Cracking due to flaw growth was determined not to be an aging effect requiring management for the steam generator support pads. The support pads are integrally cast with the steam generator channel heads. As a result, LRA Table 3.2-1, page 3.2-89, Reactor Coolant Systems - Steam Generators was revised to depict support pads in a containment air environment as follows: aging effect requiring management - none; and program/activity - none required.
- Cracking due to flaw growth was determined not to be an aging effect requiring management for the steam generator seismic support lugs. The design of the seismic support lugs is such that they do not transmit loads between the steam generators and the containment structures. As a result, LRA Table 3.2-1, page 3.2-89, Reactor Coolant Systems - Steam Generators was revised to depict seismic lugs in a containment air environment as follows: aging effect requiring management - none; and program/activity - none required.
- The inspection category for the reactor vessel flange in the ASME Section XI Subsection IWB, IWC, and IWD Inservice Inspection Program has been corrected. In accordance with ASME Section XI, Subsection IWB, Category B-N-1 visual examination (VT-3) was determined to be effective for monitoring loss of material for the reactor vessel flange. As a result, LRA Table 3.2-1, page 3.2-72, Reactor Coolant Systems - Reactor Vessels was revised to depict upper shell flanges in a containment air environment as follows: program/activity - ASME Section XI Subsections IWB, IWC, and IWD Inservice Inspection Program, Examination Category B-N-1 and Examination Category B-P.

Additionally, based on a review of the specific procedures related to the Boric Acid Wastage Surveillance Program, the following clarification is provided. The program attribute "Monitoring and Trending" is revised to indicate that a reactor coolant system leakage investigation is initiated if leakage exceeds 0.5 gpm. Based on the results of the leakage investigation, a containment inspection is performed as necessary to determine the source of the leak. This change to the LRA should be incorporated in the SER Section 3.9.3.2, Staff Evaluation, [Monitoring and Trending].

A revision to the FSAR Supplement (LRA Appendix A) will be submitted with FPL's response to the SER Open Items issued August 17, 2001. The changes to the FSAR supplement will include where applicable: responses to the SER open items and confirmatory items, responses to RAIs, and commitments from FPL letters to the NRC.

Should you have any further questions, please contact E. A. Thompson at (305)246-6921.

Very truly yours,



J. P. McElwain  
Vice President - Turkey Point

JPM/EAT/hlo

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

Annual Update to the Turkey Point Units 3 and 4 License Renewal  
Application

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

J. P. McElwain 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.

  
J. P. McElwain

Subscribed and sworn to before me this

22<sup>ND</sup> day of October, 2001.

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

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

Name of Notary Public (Type or Print)



J. P. McElwain is personally known to me.

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

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