



AUG 11 2003

L-2003-212
10 CFR 50.4

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC, 20555

RE: **Turkey Point Units 3 and 4**
Docket Nos. 50-250 and 50-251
Control Room Habitability
Generic Letter 2003-01 60-Day Response

This letter provides the Florida Power and Light Company (FPL) 60-day response to Generic Letter (GL) 2003-01, *Control Room Habitability*, for Turkey Point Units 3 and 4. Recent industry experience has demonstrated that measured in-leakage testing using the American Society of Testing and Materials (ASTM) Standard E471 methodology typically results in greater in-leakage than that assumed in the current license bases. Turkey Point is conservatively assuming that tracer gas testing, planned for August 2003, will demonstrate that current design basis in-leakage assumptions for Turkey Point Units 3 and 4 may not be met. Thus, Turkey Point may be unable to provide the information requested in item 1 of GL 2003-01 by the required December 9, 2003 180-day GL response date. In addition, Turkey Point plans to submit proposed license amendments to the NRC to adopt the 10 CFR 50.67 alternative source term (AST) methodology for assessing the radiological consequences of design basis events. The approval and implementation of the planned license amendment applications are not expected to meet the required GL 2003-01 response date.

Turkey Point is currently performing maintenance activities to address control room envelope (CRE) potential deficiencies. The activities are scheduled for completion prior to leak testing. CRE leak testing is planned for August 2003 using the methods of ASTM E741, *Standard Test Method for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution*. Test results will be evaluated and any deficiencies will be addressed under the FPL corrective action program.

Implementation of the revised accident source term at Turkey Point will use methods prescribed in Regulatory Guide 1.183, *Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors*. 10 CFR 50.67, *Accident Source Term*, requires that a revision of the design bases accident source term be approved by a license amendment under 10 CFR 50.90. The proposed license amendments for Turkey Point Units 3 and 4 using an alternative radiological source term are scheduled for submittal in fourth quarter 2003. The long-term implementation of this amendment is expected to include the installation of Trisodium Phosphate (TSP) baskets in containment.

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Upon approval of the proposed license amendments, FPL will complete its response to item 1 of GL 2003-01. FPL will keep the NRC Project Manager for Turkey Point Units 3 and 4 advised of schedule progress. If you have any questions on FPL's proposed alternative actions, please contact Walter Parker at (305) 246-6632.

Very truly yours,



Terry O. Jones
Vice President
Turkey Point Nuclear Plant

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cc: USNRC, Regional Administrator, Region II
Senior Resident Inspector, USNRC, Turkey Point Plant