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US Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Florida Power & Light Company
Turkey Point Unit 4
Docket No. 50-251

Subject: Plan for Revision of Previously Submitted Information for Generic Letter 2004-02

- References:**
- (1) Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (ML042360586)
 - (2) Updated Supplemental Response to NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," dated August 11, 2008 (ML082380244)
 - (3) Staff Requirements Memorandum (SRM) SECY-10-0113 – "Closure Options for Generic Safety Issue-191, Assessment of Debris Accumulation on Pressurized Water Reactor Sump Performance."

The NRC requested, via Reference 1, that licensees perform an evaluation of the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions based on the identified potential susceptibility of sump screens to debris blockage during design basis accidents requiring recirculation. This concern is also identified by the NRC as Generic Safety Issue 191 (GSI-191).

Subsequent to the issuance of Reference 1, Florida Power & Light Company (FPL) has taken significant actions to minimize the potential for recirculation sump blockage such as installing a vastly enlarged strainer system (an increase from 63ft² to ~3,600 ft²) and implementing additional compensatory measures including improvements in Emergency Operating Procedures and Operator training. By letter dated August 11, 2008 (Reference 2), FPL provided analysis and testing results for Unit 4 based on the best available information at the time which FPL believed to be sufficient for closure of GSI-191 at Turkey Point.

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However, continuing interaction between NRC Staff and the industry, including FPL, has resulted in a consensus understanding that further work remains before the industry and Staff reach agreement on a path forward for final resolution of the issues raised in Reference 1. Consequently, the Commission, by way of Reference 3, challenged the industry to complete additional testing and analyses in 2011 to support development of resolution plans by mid-year 2012.

FPL continues to work with industry to seek final resolution of GSI-191 and is participating in testing and analyses initiatives pursuant to Reference 3.

As discussed with Mr. Jason Paige and other members of the NRC staff April 6, 2011 detailed validation work inside the containment of Turkey Point Unit 4 during the current refueling outage identified fibrous insulation materials that are different from the materials used as inputs to the previous testing and analyses results which were submitted in Reference 2. FPL has completed an evaluation of this discovery and has determined that there remains reasonable assurance the emergency core cooling system (ECCS) is capable of providing long term core cooling and that the specified safety function is expected to perform as designed, tested, and maintained. This determination is documented in FPL's corrective action program.

FPL will develop a path forward for Turkey Point Unit 4 consistent with the schedule and results of industry testing and analyses (Reference 3). The path forward will incorporate plant-specific considerations including the evaluation and analyses of insulation types, quantities and locations and, as applicable, plans for insulation mitigation and strainer testing. Once these efforts are completed, FPL will amend its August 11, 2008 submittal to reflect this revised consensus approach.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

Very truly yours,



Michael Kiley
Vice President
Turkey Point Nuclear Plant

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