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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co 05000251
 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335

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 UHRIG, R.E. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Operating Reactors

SUBJECT: Responds to NRC 790723 & 0801 ltrs re proposed amend to ULs adding condition of license requirement to establish & implement secondary water chemistry monitoring program. Program tends to reduce outage times & repair costs.

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October 3, 1979
L-79-274

Director of Nuclear Reactor Regulation
Attention: Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:


Re: Turkey Point Units 3 and 4
St. Lucie Unit 1
Docket Nos. 50-250, 50-251, and 50-335

This letter is in response to NRC letters dated July 23, 1979 and August 1, 1979 which requested that we submit a proposed amendment to our facility operating licenses to add a "condition of license" requirement to establish and implement a secondary water chemistry monitoring program. It is Florida Power & Light Company's policy to maintain an aggressive program for the monitoring and control of secondary water chemistry. We feel that the maintenance of such a program is beneficial to both our stockholders and our customers as it tends to reduce outage times and repair costs.

It is also our position that the monitoring of secondary water chemistry is not the primary means for protecting the health and safety of the public because the existing operating licenses for Turkey Point Units 3 and 4 and St. Lucie Unit 1 already contain other requirements that provide for such protection, e.g., limits on primary-to-secondary leakage, and periodic steam generator inspections. Therefore, the addition of a license condition to require a secondary chemistry monitoring program would appear to be redundant and without measurable benefit.

The NRC letters of July 23, 1979 and August 1, 1979 also requested that we propose an amendment to our facility Technical Specifications which would delete limiting conditions for operation and surveillance requirements for secondary water chemistry parameters. On May 20, 1977 (L-77-151), FPL submitted such a request for St. Lucie Unit 1. Please let us know if you need any additional information relative to that request. Our review has indicated that a similar request for Turkey Point is not necessary.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU:GDW:MAS:cf

cc: Mr. James P. O'Reilly, Region II
Robert Lowenstein, Esquire
Harold Reis, Esquire

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