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SUBJECT: Comment on proposed rule 56FR16130 re generic issue 23, "Reactor Coolant Pump Seal Failure" & draft reg guide DG-1008. Util endorses comments submitted by NUMARC.

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56 FR 16130
P.O. Box 14000, Juno Beach, FL 33408-0420

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Ms. Carol Ann Reed
(Acting) Chief, Regulatory Publications Branch
Division of Freedom of Information
and Publications Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Re: Solicitation of Public Comments on Generic Issue 23,
"Reactor Coolant Pump Seal Failure", and Draft
Regulatory Guide; Issuance Availability
56 FR 16130 (April 19, 1991)
Request for Comment

Dear Ms. Reed:

At 56 FR 16130, the NRC requested comments on the staff's current understandings, findings, and potential recommendations regarding Generic Issue 23 (GI-23), "Reactor Coolant Pump Seal Failure." These comments are submitted on behalf of Florida Power & Light Company (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida, and two units in St. Lucie County, Florida.

The Nuclear Management and Resources Council, Inc. (NUMARC) is offering comments on the subject GI-23. FPL endorses the comments submitted by NUMARC, particularly:

1. The need for the proposed resolution is based on data from 1969 to 1984. Improved performance of reactor coolant pump seals during subsequent years has not been taken into account.
2. The industry has already taken the most effective and practical measures to increase seal reliability. These measures have resulted in a demonstrated reduction in the frequency of occurrences of leakages of all magnitudes.

Additionally, the Combustion Engineering Owners Group (CEOG) and the Westinghouse Owners Group (WOG) are offering comments. These two Owners Groups have compiled information from the member utilities in response to the questions contained in the Federal Register Notice. FPL provided plant specific data to each of these Owners Groups for inclusion into the comment letters. FPL also endorses the comments submitted by the CEOG and the WOG.

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Thank you for the opportunity to comment.

Sincerely,



W.H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/vmg

cc: A. Marion, Nuclear Utility and Management Resources Council,
Inc.

