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SUBJECT: Comment opposing proposed GL "Relocation of Pressure Temp Limit Curves & Low Temp Overpressure Protection Sys Limits."

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m. Weston; A. Kugler
FPL

Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420

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JUN 28 1995
RULES REVIEW BR.
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Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: *Proposed Generic Letter; Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits*
(60 FR 28805, June 2, 1995)
Request for Comments

On June 2, 1995, the Nuclear Regulatory Commission published for public comment, "Proposed Generic Letter; Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits." These comments are submitted on behalf of Florida Power & Light (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

FPL agrees with the concept to voluntarily relocate the pressure temperature limit curves and low temperature overpressure protection system limits from the Technical Specifications to a licensee controlled document. However, several of the details described in this proposed generic letter (GL) are confusing, and it contains new and different terms without clarification. FPL's major concern is that subsequent changes to the methodology will require a license amendment. There are a number of minor changes which occur in the methodologies, lending themselves to an increase in license amendment submittals over time. This appears counterproductive to a reduction in regulatory burden.

Specific questions and/or comments are provided below:

- What is a fluence period ? This is a new term and needs defining or clarification.
- Can the PTLR replace the reporting requirements of 10CFR50.61?
- What are the criteria for determining when there is a change in methodology such that a license amendment is required. Guidance is needed on whether changes to a methodology can be accomplished under 10 CFR 50.59.

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- The pending Regulatory Guide on fluence and Regulatory Guide 1.99, Rev.2, appear to be considered as mandatory within this GL. Is this the intent? GL 88-11 still allows alternate methods with justification.

We appreciate the opportunity to comment on this proposed generic letter.

Very truly yours,

W. H. Bohlke
for W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/spt

(EMPLOYEES)

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