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 AUTH. NAME AUTHOR AFFILIATION
 UHRIG, R.E. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Forwards description & bases for conflicting plans & schedules, in response to NRC 800905 ltr re preliminary clarification of TMI action plan requirements.

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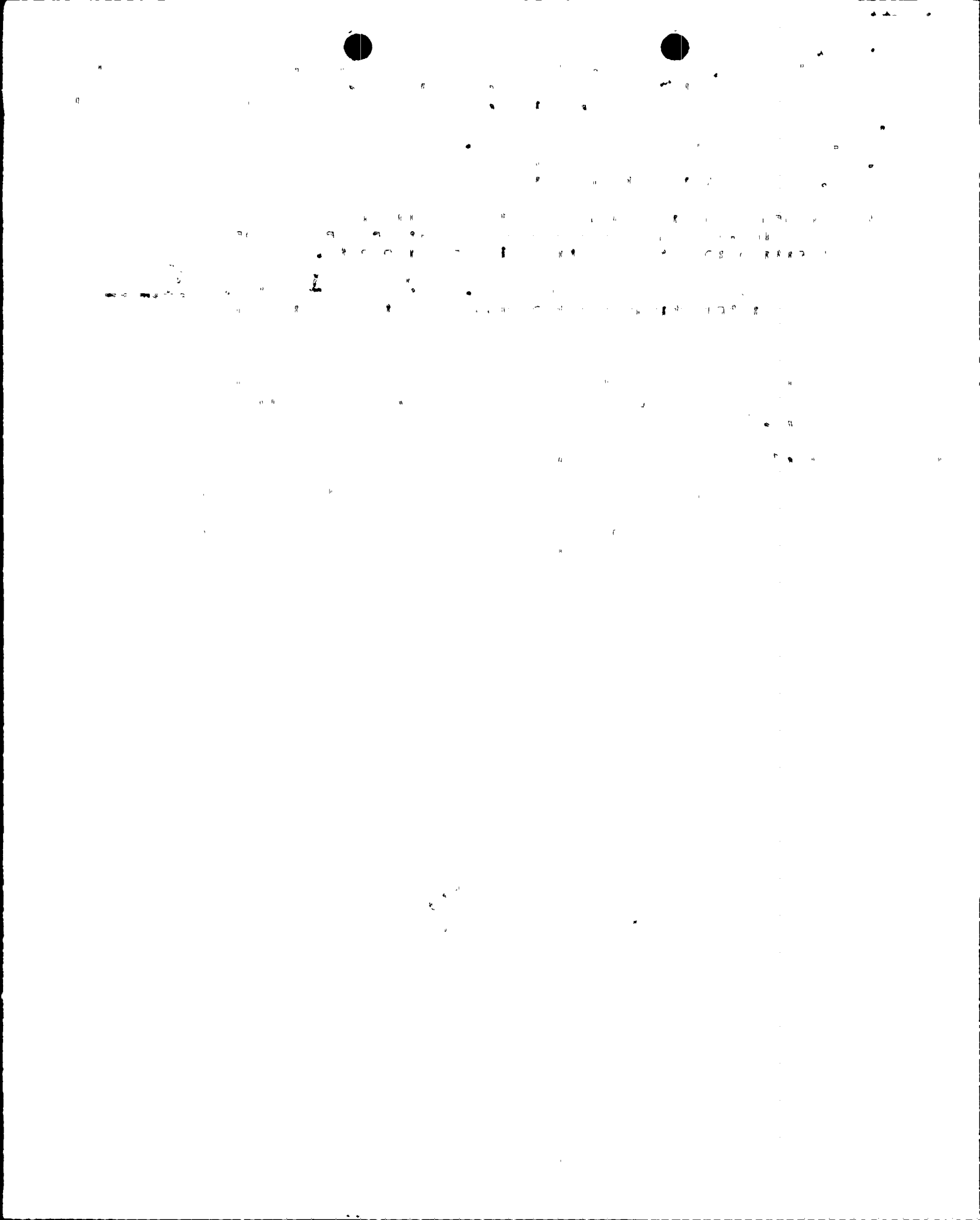
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FLORIDA POWER & LIGHT COMPANY

October 30, 1980

L-80-359

Office of Nuclear Reactor Regulation
Attention: Mr. D. G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

RE: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
TMI Action Plan -----

We have reviewed your letter of September 5, 1980 on the subject of "preliminary clarification of TMI Action Plan requirements." Based on that review, we have found a few cases where our plans and schedules do not coincide with the clarification letter. A description of these cases and the bases for our plans and schedules are attached.

We will advise you of any changes in our position, or if we identify additional cases where our plans do not coincide with the clarification letter.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/ras

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire

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8011040401

ATTACHMENT

RE: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
TMI Action Plan

1. TECHNICAL SPECIFICATIONS

A proposed Technical Specification amendment has been prepared in response to an NRC letter dated July 2, 1980 (implementation of TMI Lessons Learned Category A items). The proposal is being reviewed by our on-site and off-site review committees and will be submitted upon final approval by those committees.

We understand that additional model Technical Specifications are being developed by the NRC Staff, and that they will be issued after issuance of the final TMI Action Plan requirements package. We will consider proposing additional Technical Specification amendments following receipt and review of the final requirements package.

2. ACCIDENT REANALYSIS (I.C.1)

We concur with the Westinghouse Owners Group position described in letter OG-42 of October 8, 1980 from Mr. R. W. Jurgensen, Chairman, Westinghouse Owners Group to Mr. D. G. Eisenhut, Director, Division of Licensing.

3. SAFETY/RELIEF VALVE TESTING (II.D.1)

We understand that EPRI is developing a proposal in response to the new requirement pertaining to block valve testing. We expect to pursue this matter through the Westinghouse Owners Group.

Adaptation of the test facility to accommodate ATWS conditions is another new requirement that will involve Owners Group consideration.

4. AFW FLOWRATE INDICATION (II.E.1.1)

Implementation has been rescheduled for March, 1981 (after the January 1, 1981 due date) because of late delivery of indicators. The modification does not require shutdown.

5. ISOLATION DEPENDABILITY (II.E.4.2)

A revised list of essential and non-essential systems is required by January 1, 1981. Development of a list and scheduling of potential modifications depends on the issuance of additional guidance from the NRC on classification of essential and non-essential systems. If further NRC clarification leads to additional modifications, we would not expect the new modifications to be completed by July 1, 1981.



In addition, some of the shorter term modifications originally planned for completion by January 1, 1981 have been rescheduled due to longer than expected lead times for safety related valves. Delivery of some valves may be extended beyond 12 months, in which case this item would be fully completed during scheduled outages in 1982.

6. ACCIDENT MONITORING INSTRUMENTATION (II.F.1)

Equipment delivery associated with the Containment Pressure and the Containment Water Level modifications is scheduled for the January - February, 1981 time frame (after the January 1, 1981 due date). The Containment Pressure Modification does not require shutdown and will be implemented as soon as possible after equipment delivery. The Containment Water Level modification, which does require shutdown, is scheduled for completion during the Unit 3 refueling in approximately March 1981 and during the Unit 4 steam generator repair in the fall of 1981.

New requirements associated with the Containment Hydrogen Monitor are being evaluated and could effect our ability to meet the October, 1981 implementation date.

7. SMALL BREAK LOCA ANALYSES (II.K.3.30)

We concur with the Westinghouse position described in letter NS-TMA-2318 of September 26, 1980 from Mr. T. M. Anderson, Manager, Nuclear Safety Department to Mr. D. G. Eisenhut, Director, Division of Licensing.



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FLORIDA POWER & LIGHT COMPANY

INTER-OFFICE CORRESPONDENCE

TO	R. E. Uhrig	LOCATION	Power Resources
		DATE	October 20, 1980
FROM	A. D. Schmidt	COPIES TO	R.J. Acosta
			S.G. Brain
SUBJECT:	<u>TURKEY POINT UNITS 3 & 4</u>		D.W. Haase
	<u>TMI ACTION PLAN</u>		D.W. Jones
			H.N. Paduano/910.16TP
			C.O. Woody
			H.E. Yaeger/J.K. Hays
			PRN-LI-80-438

The subject information is attached for your review and forwarding to the NRC.

J.R. Bensen
for A. D. Schmidt

MAS/ras

Attachment

