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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME AUTHOR AFFILIATION
 UHRIG, R.E. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 NOVAK, T.M. Assistant Director for Operating Reactors

SUBJECT: Responds to NRC 810211 partial review of environ
 qualification of safety-related electrical equipment.
 Meetings should be held between NRC & util to identify each
 concern.

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February 27, 1981

Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Novak:

RE: Turkey Point Units 3 & 4
Facility License Nos. DPR-31 & DPR-41
Environmental Qualification of Safety-Related
Electrical Equipment

Your letter of February 11, 1981 transmitted the preliminary results of the Staff's review of the environmental qualification of safety-related electrical equipment in harsh environments for the Turkey Point facility. It requests a 10 day response that assesses the safety significance of questions or concerns identified by the Staff to be followed by an item-by-item response at some later date. This letter constitutes our 10 day response.

The Staff's Partial Review Equipment Evaluation Report (PREER) lacks the technical details required for us to perform a comprehensive engineering evaluation of Staff concerns cited therein. To obtain further clarification of these concerns, the contents of the PREER were discussed with members of the NRC Staff on February 25, 1981. Based on these discussions and our review of the PREER, we believe that the Staff concerns relate to detailed engineering aspects of the environmental qualification methodology. The Staff concerns do not seem to identify any new or substantive safety issues that have not been previously considered by FPL or its consultant during our previous evaluations.

Our philosophical approach appears consistent with that utilized by the Staff. Thus your letter does not appear to provide a basis for altering the conclusions reached in our prior submittals to you. In our judgment the equipment qualification adequately addresses the NRC's environmental qualification requirements. On this basis we conclude that operation of the facility does not pose any undue risk to public health and safety.

The following is a discussion of some specific Staff concerns identified in the PREER. This discussion is provided to support our conclusions, and illustrate our contention that an item cannot be addressed until our engineers can meet with the staff and discuss in detail the technical concerns;

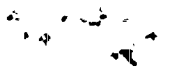
- (1) On page 3 of the PREER, the Staff suggests that a maximum containment temperature of 298 °F should be used in lieu of 276 °F to account for higher-than-average temperatures that might exist in the upper regions of the containment due to stratification. This is not considered relevant to Turkey Point since;

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- (a) There is no safety related electrical equipment located in the upper regions of the containment. (This is not explicitly stated in our previous reports.)
 - (b) Operation of the containment spray system should negate any concerns over stratification of air within containment.
 - (c) The 276 °F criterion is based on conservative analytical methods. In the real world, lower peak temperatures would be expected.
- (2) On page 2 of the PREER, the Staff addresses display instrumentation used by the reactor operators. Our previous responses did not explicitly identify display information used by the operators. However in the attachment to our October 30, 1980 letter we identified criteria used for development of the Master Equipment List.

Criterion 3 therein states "The item is relied upon by the operators in the emergency procedures for LOCA or HELB." Or stated in a more direct manner, if the operator needs it, the item's environmental qualification was addressed. Thus, to our knowledge, transmitters providing intelligence to the reactor operators were addressed in our previous submittals.

- (3) Pressure and levels transmitters, e.g.. PT-3-405 and LT-3-474 were qualification tested to very stringent requirements for the severe portion of the transient; viz., 75 psig compared to a required peak pressure of 50 psig. The Staff concern relates to the long term (after 24 hrs) low pressure (5 psig) aspect of the transient and not the severe initial phase of the transient. Since the components successfully passed a qualification test that conservatively envelopes the critical pressure stage of the transient, it was concluded that the essentially ambient long term pressure condition could be accomodated.

An "RT" (required time) Staff concern is identified for transmitters, PT-3-455, 456, and 457. The required qualification time is $1\frac{1}{2}$ hour and the qualification test duration was 2 hours. Thus, the Staff's concern doesn't readily manifest itself.

- (4) The Staff persists in attempting to backfit margin into the electrical design by imposing an arbitrary 1 hour plus RT qualification requirement. We specifically addressed this issue in the attachment to our October 30, 1980 letter. It is our contention that the Commission's regulation at 10 CFR 50.109 requires the backfitting of margin advocated by the Staff be supported by a



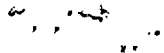
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finding that such action results in "substantial, additional protection which is required for the public health and safety." Obviously 10 CFR 50.109 requires that the Staff perform this evaluation for each item so backfitted. The Staff's judgement would not appear to provide the basis required by 10 CFR 50.109.

- (5) Our previous submittals have addressed aging and have committed to developing a program for periodic replacement of electrical components. It is our belief that this program in conjunction with the periodic testing and inspection requirements imposed by the unit's Technical Specifications adequately addresses aging. In our February 25, 1981 discussions the Staff suggested that a surveillance program for cable may provide some benefit. We noted that this requirement would be in conflict with the Staff's fire protection requirements in that the cables are presently coated with Flamastic.
- (6) Appendix B to the PREER appears to contain some typographical errors and based on our February 25, 1981 discussions it would appear that the copy received by us is a different draft than that being utilized by your technical staff. We reach this conclusion since some apparent typographical errors in our version were corrected in the Staff version. This comment is substantive since the errors relate to application of the legend utilized to designate Staff concerns.
- (7) The Staff requested that we discuss single failure as it relates to the containment spray system. Although not stated in the qualification report, the containment spray system is composed of two separate and redundant systems. It is not subject to a disabling single failure.
- (8) It appears that our reference to proprietary information has been identified as a deficiency by the Staff. It was not possible for us to include proprietary data in the submittal. However, this data is available for Staff review at Turkey Point.



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In summary, we believe that the Staff concerns are resolvable. However, to accomplish this, each concern for each item must be explicitly identified. The most efficient means of accomplishing this is via a series of meetings between our engineers and your technical Staff. Subsequent to these meetings we can provide the clarifying technical data required to resolve any outstanding Staff concerns. We are willing to meet with your technical Staff at your convenience.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/JEM/mbd

Attachments

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



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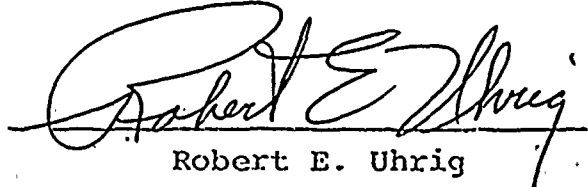
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STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

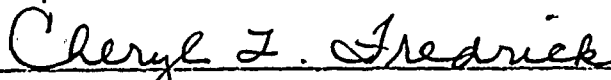
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.

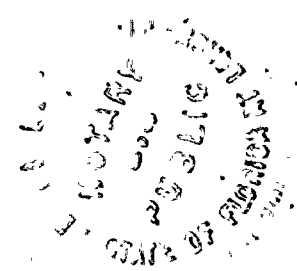

Robert E. Uhrig

Subscribed and sworn to before me this

27 day of February, 1981


NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
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