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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
 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 81-36 re submittal of preliminary evaluation supported by test results to demonstrate capability of PWR relief & safety valves. Plant-specific evaluation will be submitted by 820901.

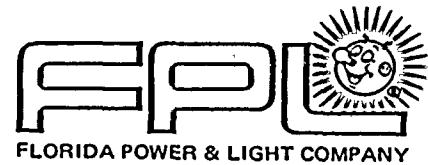
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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rmmts (OL's)

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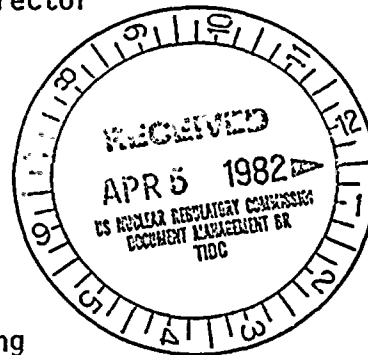


April 1, 1982
L-82-127

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell 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
Post-TMI Requirements
NUREG-0737 Item II.D.1
PWR Relief and Safety Valve Testing



The NRC Generic Letter No. 81-36 dated September 29, 1981 contains a revised schedule for the submittal of the results of the relief and safety valve test program and the submittal of plant specific reports. The initial NRC schedule and recommendations were contained in NUREG-0578, section 2.1.2 as later clarified in NUREG-0737, Item II.D.1. The generic letter requested that each pressurized water reactor (PWR) utility submit on or before April 1, 1982, a preliminary evaluation supported by test results which demonstrates the capability of relief and safety valves to operate under expected operating and accident conditions. This letter contains the Florida Power and Light Company's response that is applicable to Turkey Point Units 3 & 4 as required to be submitted on or before April 1, 1982.

Florida Power and Light is a participant in the Generic PWR Safety and Relief Valve Test Program implemented by the Electric Power Research Institute at the request of participating PWR Utilities in response to the USNRC recommendations for safety and relief valve testing.

The primary objective of the Test Program was to provide full scale test data confirming the functionability of primary system power operated relief valves and safety valves for expected operating and accident conditions. The second object of the program was to obtain sufficient piping thermal hydraulic load data to permit confirmation of models which may be utilized for plant unique analysis of safety and relief valve discharge piping systems. Relief valve tests were completed in August, 1981 and safety valve tests were completed in December, 1981. The reports prepared by EPRI documenting the Test Program results are as follows:

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"Valve Selection/Justification Report"

This report documents that the selected test valves represent all participating PWR plant and safety and relief valves.

"Test Condition Justification Report" and the "Westinghouse Plant Condition Justification Report"

These reports document the basis and justification of the valve test conditions for all participating PWR plants.

"Safety and Relief Valve Test Report"

This report provides evidence demonstrating the functionability of the selected test valves under the selected test conditions for all participating PWR plants.

"Application of RELAP 5/MOD 1 for Calculation of Safety and Relief Valve Discharge Piping Hydrodynamic Loads"

This report presents an analytical model benchmarked against test data that may be used for plant unique analysis of safety and relief valve discharge piping systems.

All of the documents have been received by Florida Power and Light and are applicable to Turkey Point Units 3 & 4. They have been transmitted to Mr. Harold Denton by David Hoffman of Consumers Power on behalf of the participating PWR Utilities in a letter dated April 1, 1982.

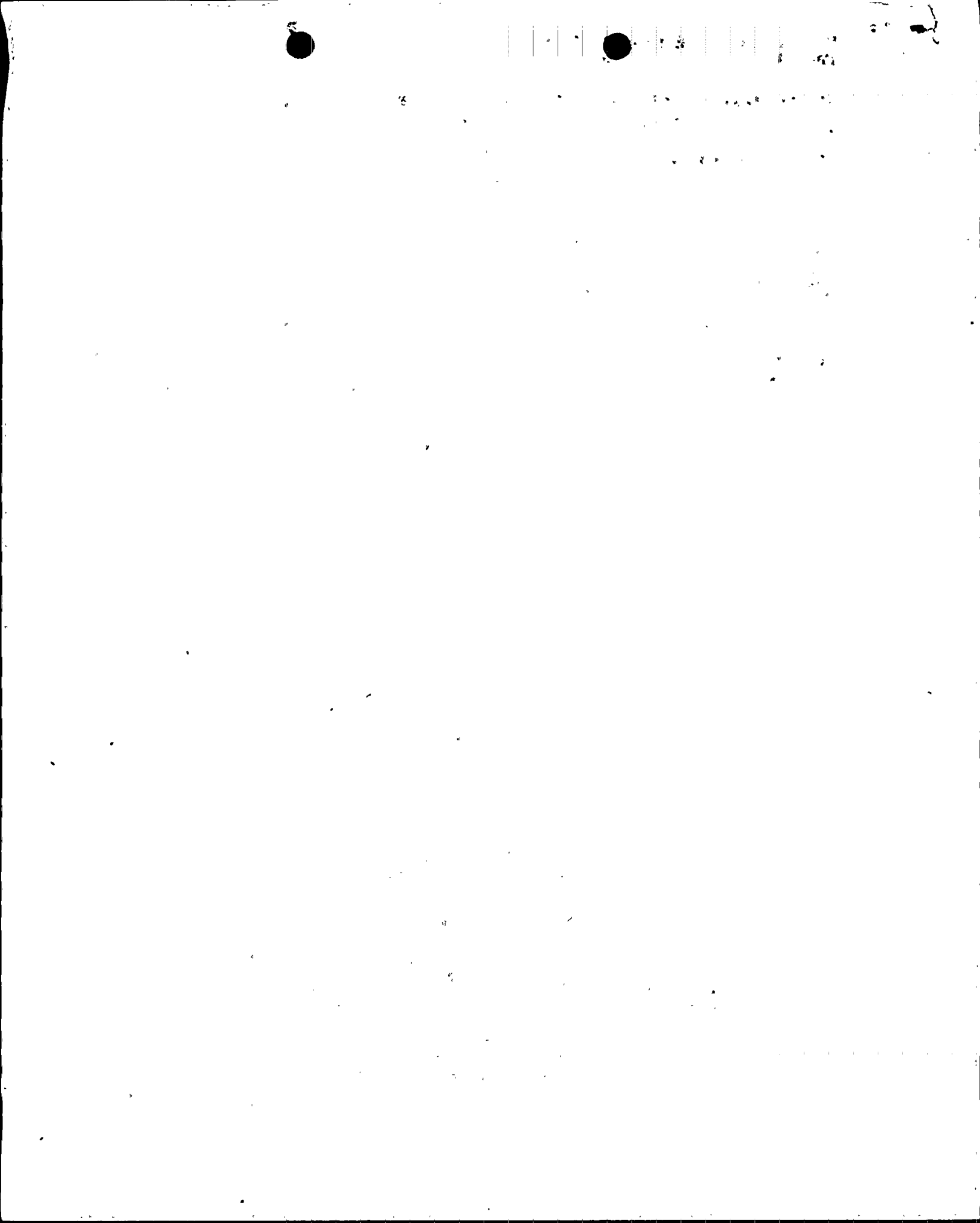
In addition to providing the referenced reports, Florida Power and Light Company has performed a preliminary review of the Test Program results. Based on the review, we have concluded that the valves tested represent the safety and relief valves designs and that the conditions tested envelop the range of expected operating and accident conditions for Turkey Point Units 3 & 4. Also the above mentioned Reports do provide the evidence required by NUREG 0737, Item II.D.1.A which will be used to perform the final plant specific evaluations.

The September 29, 1981 NRC letter requests that plant specific final evaluations be submitted by July 1, 1982. The Westinghouse Owners Group will assist in interpreting the test data, and provide analyses and hardware recommendations if required. Westinghouse has tentatively proposed that the final results of their evaluation will be complete by June 15, 1982. It is our intent to review their evaluations and



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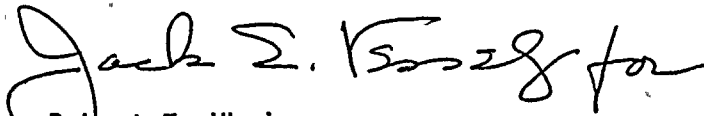
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Mr. Darrell G. Eisenh Director
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and recommendations and submit a plant specific evaluation of Turkey
Point Units 3 & 4 to you by September 1, 1982.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PKG/JDR/ras

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

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