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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 82-10 "Post-TMI Requirements." Status provided for Items I.A.1.3.1 re limitations on overtime I.A.1.4.2 re min shift crew & I.D.1 re control room design review.

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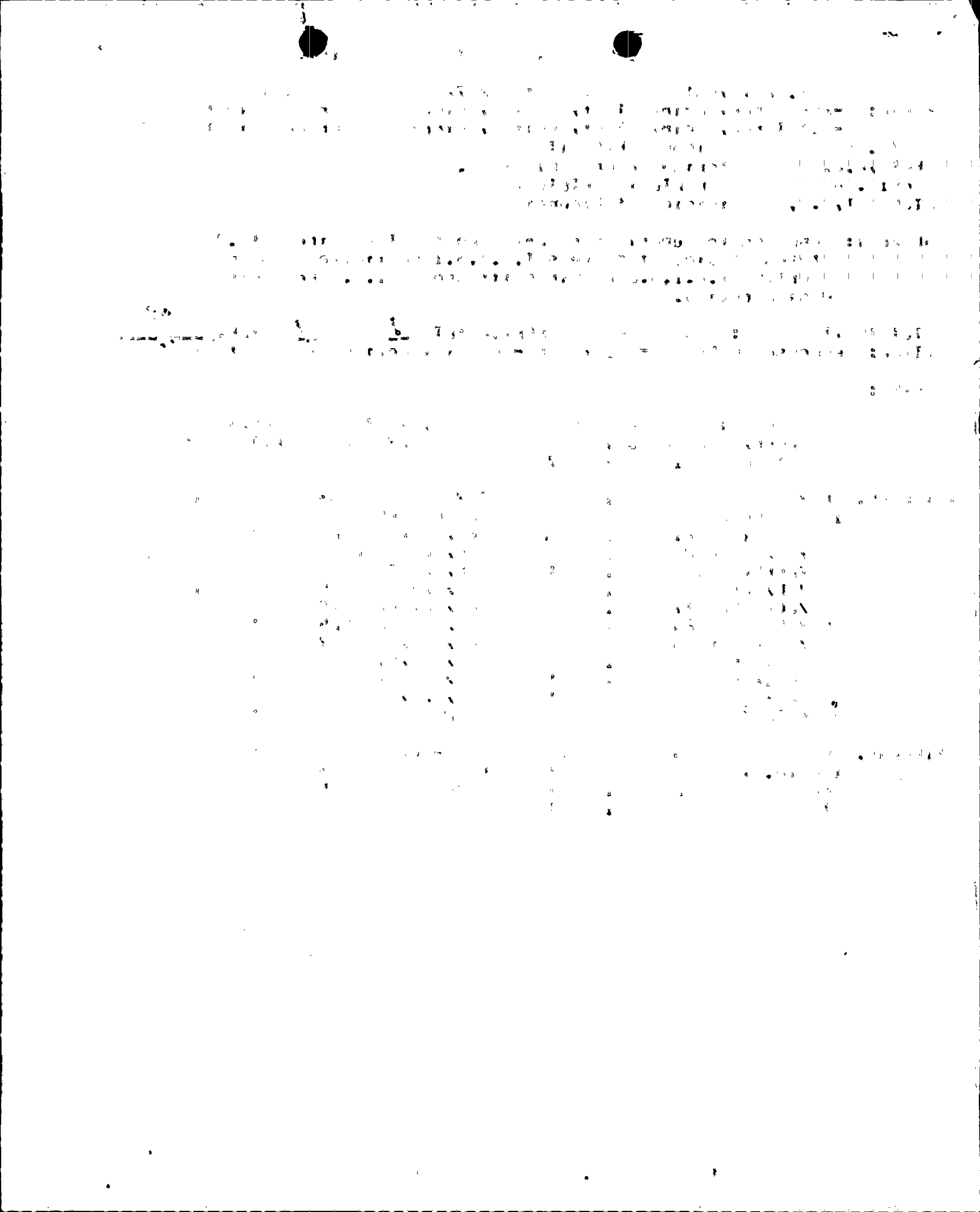

P. O. BOX 14000, JUNO BEACH, FL 33408

FLORIDA POWER & LIGHT COMPANY

July 2, 1982
L-82-271

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 No. 50-250 and 50-251
Post-TMI Requirements
Generic Letter No. 82-10

This letter transmits to you our response to Generic Letter No. 82-10.

Very truly yours,

J. A. de Mastry

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PKG/mbd

Attachment

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

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P PDR

ATTACHMENT

Turkey Point Units 3 & 4
Docket No. 50-250 and 50-251
Post-TMI Requirements
Generic Letter No. 82-10

1. SHIFT STAFFING - LIMITATIONS ON OVERTIME (I.A.1.3.1)

The NRC has accepted our present program which is used for Turkey Point Units 3 and 4. A letter from S.A. Varga (NRC) to R.E. Uhrig (FPL) dated October 20, 1981 stated that the FPL policy on overtime restriction for the Turkey Point Plant was reviewed and found to be in agreement with NUREG-0737. Based on that review, the NRC staff found the policy acceptable. We have no plans to change this NRC approved program and consider this item closed.

2. MINIMUM SHIFT CREW (I.A.1.3.2)

The minimum shift crew composition and Turkey Point Units 3 and 4 conforms with the minimum levels set fourth on page 3-9 of NUREG-0737. Table 6.2-1 of the Technical Specifications reflects this compliance.

3. REVISE EMERGENCY PROCEDURES (I.C.1)

Although the schedule for revised emergency procedures promulgated in NUREG-0737 required implementation by the first refueling after 1/1/82, we understand that the commissioners are presently considering a revised implementation schedule for this item under the topic of SECY 82-111; "Requirements for Emergency Response Capabilities". Apparently, commission action on this document is forthcoming. We will respond to the results of this commission action when the revised implementation schedule has been published.

4. CONTROL ROOM DESIGN REVIEW (I.D.1)

No reply requested

5. SPDS (I.D.2)

No reply requested

6. RCS VENTS (II.B.1)

No reply requested

7. PLANT SHIELDING PT. 3 ENVIRONMENTAL QUALIFICATIONS (II.B.2.3)

No reply requested

8. RELIEF VALVE AND SAFETY VALVE TEST PROGRAMS (II.D.2.1)

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

In our letter L-82-127 dated April 1, 1982 we provided you with our preliminary evaluations of the Test Program results. The initial reports themselves had been transmitted to Mr. Harold Denton by Mr. David Hoffman of Consumers Power Company on behalf of the participating PWR utilities in a letter dated April 1, 1982.

In our April 1, 1982 letter, we stated it was our intent to submit a plant specific evaluation of Turkey Point Units 3 & 4 to you by September 1, 1982. Our schedule has been revised as follows:

i. An evaluation of the Turkey Point Plant PORV's will be transmitted to you on or before July 9, 1982.

ii. An evaluation of the Turkey Point Plant safety valves will be transmitted to you on or before September 1, 1982. This remains unchanged.

(a) Justification for proposed schedule

The evaluation of safety valve operability cannot be completed until the discharge piping reanalysis is completed. The results of the discharge piping reanalysis may affect the safety valve evaluation.

(b) Demonstration of Need for Proposed Schedule

The proposed schedule is required to allow Ebasco Services Inc. to complete their discharge piping reanalysis.

(c) Description of compensatory measures being taken in the interim

Not applicable

9. BLOCK VALVE TEST PROGRAM (II.D.1.3)

The PORV Block Valve Information Package dated May, 1982 prepared by EPRI was transmitted to Mr. Harold Denton by R.C. Youngdahl of Consumers Power Company on behalf of the participating PWR utilities on June 1, 1982. An evaluation of the Turkey Point Units 3 & 4 block valves will be transmitted to you on August 16, 1982.

(a) Justification for Proposed Schedule

Valve manufacturer input is required to check the torque settings on the motor operator. This is a recommendation contained in the EPRI PORV Block Valve Information Package.

(b) Demonstration of Need for Proposed Schedule

The proposed schedule is required to allow the valve manufacturer time time to check the torque settings on the motor operator.

(c) Description of Compensatory Measures Being Taken in the Interim

Not Applicable

10. INSTRUMENTATION FOR INADEQUATE CORE COOLING (II.F.2)

No reply requested

11. ADS ACTUATION (II.K.3.18)

Not applicable to Turkey Point Units 3 and 4 - BWR only

12. SMALL-BREAK LOCA ANALYSIS (II.K.3.30 & 31)

A draft version of Westinghouse Topical Report WCAP-10054 "Westinghouse SB ECCS Model" describing the NOTRUMP Code has been submitted to the NRC for review by Westinghouse in letter No. NS-EPR-2581 dated March 26, 1982.

It is premature at this time to provide you with a date by which we will be able to submit plant specific analyses per Item II.K.3.31. We intend at this time to await an NRC approval prior to our scheduling for the completion of the task.

13. STAFFING LEVELS FOR EMERGENCY SITUATIONS (III.A.1.2)

All positions identified as "On-Shift" will be manned continuously during normal operations and as required by Technical Specifications with all units shut down.

Augmented staffing identified as "30 minute" and "60 minute" requirements will be discussed in subsequent correspondence with the Regional Administrator of NRC Region II.

14. UPGRADE EMERGENCY SUPPORT FACILITIES (III.A.1.2)

An Operational Support Center (OSC) is provided, on-site, with adequate space for personnel, communications, and provisions for equipment and supplies.

The Technical Support Center (TSC) as described in previous correspondence (FPL letters L-81-241, dated June 8, 1981 and L-81-447, dated October 13, 1981) will be completed by October 1, 1982.

The site chosen for the Turkey Point Emergency Operations Facility (EOF) is the subject for a request for exemption currently being reviewed by the NRC. A schedule for completion of the upgraded EOF will be determined when the EOF's siting is finalized. The interim EOF is currently being used until the permanent facility is complete.

15. METEOROLOGICAL DATA (III.A.2.2)

The schedule for meteorological data upgrade promulgated in NUREG-0737 required implementation by October 1, 1982. It is our understanding that the Commission is considering approval of SECY 82-111, "Requirements for Emergency Response Capabilities." We currently meet the meteorological data requirements described in the SECY 82-111 document.

16. CONTROL ROOM HABITABILITY (III.D.3.4)

In letter L-81-285 dated July 9, 1981 we provided you with the Turkey Point Unit 3 and 4 Control Room Habitability Study as required by Item III.D.3.4 of NUREG-0737. In that letter we identified short term and long term modifications to the control room that would reduce radiation exposure to the control room personnel. In that letter we stated that the short term modifications described in Section II.A of the study would be implemented within 6 to 9 months. The long term modification, described in Section II.B of the study were to be completed by January 1, 1983. Due to the interrelationship between control room design review covered in NUREG-0737 Item I.D.1 and problems with equipment procurement and delivery we are combining the schedules for short term and long term modifications into a single completion date of July 1, 1983.

The NRC staff has reviewed our proposed modifications and has requested additional information including several proposed changes to our design in letters dated April 28, 1982 and May 3, 1982. We responded in letter L-82-240 dated June 9, 1982 to one question and committed to respond to the remainder by July 16, 1982. In that letter we will also include a description of how the short-term and long-term modifications have been combined. It should be noted that the new completion date of July 1, 1983 does not include scheduling for the proposed NRC staff changes to our design. If changes are mandated, a revised schedule may need to be submitted. We will inform you of any necessary changes.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

J. A. DeMastry, being first duly sworn, deposes and says:

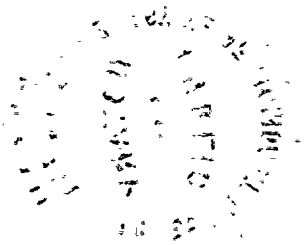
That he is Manager, Nuclear Licensing of Florida Power & Light Company, the herein;

That he has executed the foregoing document; that the statements 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

J A de Mastry
J. A. DeMastry

Subscribed and sworn to before me this

2 day of July, 1982

Cheryl L. Fredrick
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 Bonded thru Maynard Bonding Agency