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RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Submits Tech Spec exemptions for U steam generator repair outage,Unit defueled until repairs complete.

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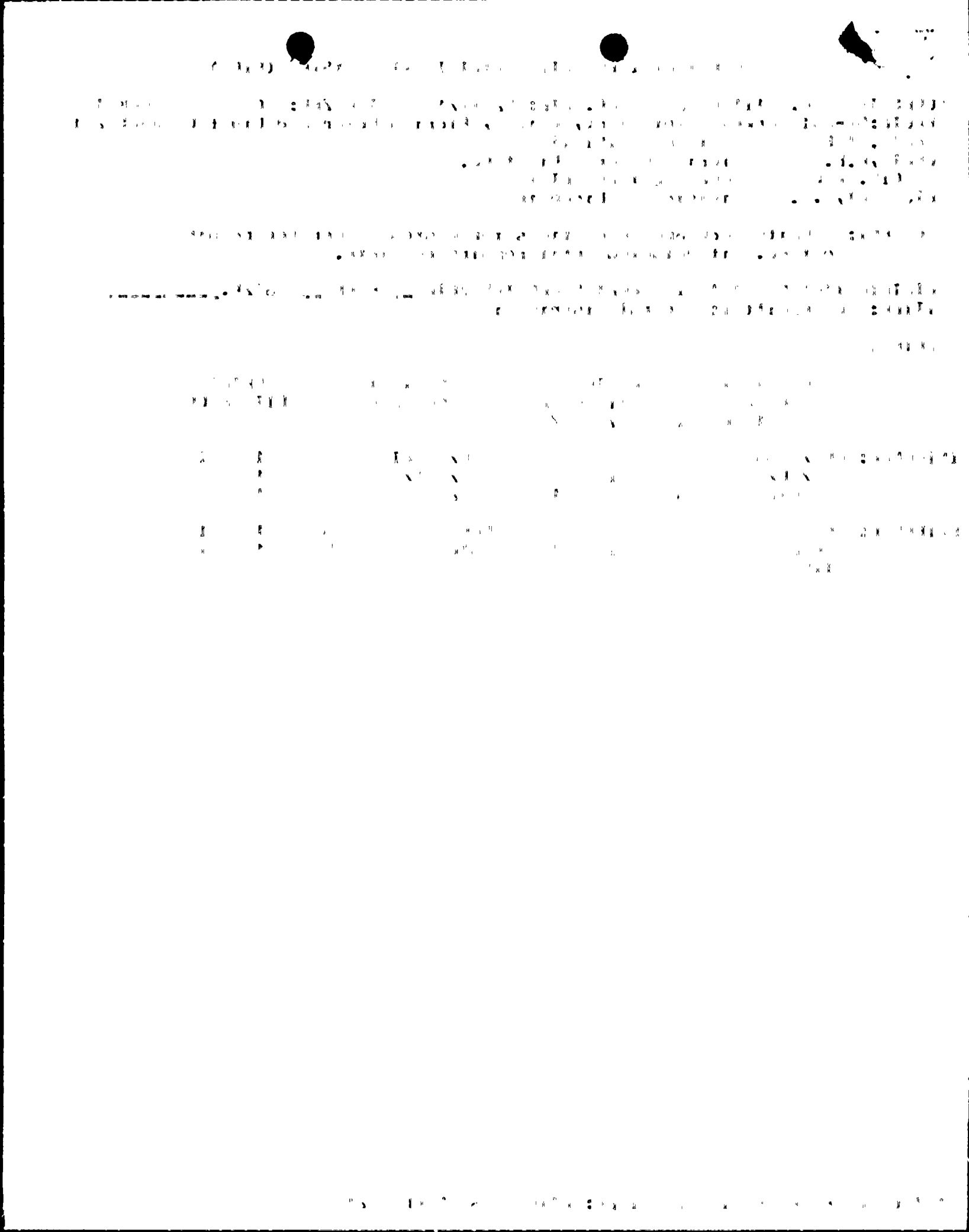

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FLORIDA POWER & LIGHT COMPANY

November 10, 1982
L-82-497

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 & 50-251
Technical Specification Exemptions
During Unit 4 Steam Generator Repair Outage

Due to our outage for repair of the Unit 4 steam generators, and in accordance with Amendment 61 to our facility operation license (DPR-41), we have defueled the Unit 4 reactor and will maintain it in that condition until repairs are complete. Our Technical Specifications specifically waive many of the surveillance requirements during various shutdown conditions. In addition, we have identified some other surveillance requirements which, though not specifically exempted for normal shutdowns, are clearly not required when no fuel is in the reactor.

These requirements are:

1) Technical Specification Table 4.1-1(1), Nuclear Power Range Surveillances
2) Technical Specification Table 4.1-1(2), Nuclear Intermediate Range Shift Check
3) Technical Specification Table 4.1-1(3), Nuclear Source Range Shift Check
4) Technical Specification Table 4.1-2(1), Reactor Coolant System Sampling
5) Technical Specification 4.4.2.2, Personnel and Emergency Air Lock Leak Rate Tests
6) Technical Specification 4.4.2.3, Equipment Hatch Leak Rate Test
7) Technical Specification 4.5.2.a, RHR Pump Monthly Test

The equipment tested by the above specifications is not required to be operable when no fuel is in the reactor and there is no conceivable occurrence in this condition which would call upon the equipment to perform its safety function.

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Technical Specification 6.2.2, Facility Staff, includes Table 6.2-1, Minimum Shift Crew Composition. This Table requires three RO's on shift with one unit in operation. Since one unit is not only shutdown, but also has the fuel removed, the need for the third RO has been greatly reduced. Therefore, we propose to reduce the requirement temporarily to two RO's on shift. We do not propose to reduce the number of SRO's on shift. The third RO will return as presently required prior to fuel loading in Unit 4.

Therefore, as discussed and agreed upon with your staff prior to the Unit 3 Steam Generator Repair Outage, we do not intend to implement the Technical Specifications listed above for the duration of the Steam Generator Repair Outage. This change has been reviewed and approved by the Plant Nuclear Safety Committee.

Very truly yours,

J a de Mestay
for

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/JEM/js

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