

ENCLOSURE

SAFETY EVALUATION REPORT  
ON REQUESTS FOR RELIEF FROM INSERVICE TESTING REQUIREMENTS  
FLORIDA POWER AND LIGHT COMPANY  
TURKEY POINT UNITS 3 AND 4  
DOCKET NOS. 50-250/50-251

I. Background

By letter dated October 24, 1984, Florida Power and Light (FPL) added the spent fuel pit cooling pumps (\*P212A & \*P212B) to the pump and valve inservice test (IST) program for Turkey Point, Units 3 and 4. The implementation date for conformance with the ASME Code testing requirements was set at January 1, 1986.

II. Relief Request

By letter dated December 26, 1985 as supplemented on August 20, 1986, the licensee requested a schedule extension to complete the installation of the spent fuel pit cooling pump flow measurement devices. Conformance with the Code testing requirements for these pumps is now set to be achieved no later than the beginning of the Unit 3 Cycle 11 and Unit 4 Cycle 12 refueling outages.

III. Proposed Alternative

The licensee's proposed alternative is to continue operation of the spent fuel pit cooling of system based on the original system design with the addition of the installed spare pump and alternate connections to provide for connecting a temporary pump to the spent fuel cooling loop.

IV. Staff Evaluation

The original spent fuel pit cooling system was based on removal and replacement of the cooling pump when spent fuel pit cooling could not be accomplished. The time period required for removal and replacement of the pump was within the 7.6 hours limit that the cooling system could be out of service. According to information provided by the licensee, both Units 3 and 4 have two permanently installed, redundant cooling pumps each capable of providing flow to the spent fuel pool. In addition, both units have a spare pump installed in the piping loop. This third pump is not hard wired but needs only to be connected into a local power outlet to be operational.

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The licensee must make the necessary modifications to conform to the requirements as ASME Code, Section XI prior to the beginning of the Unit 3 Cycle 11 and Unit 4 Cycle 12 refueling outages (February 1987 and December 1987, respectively). Requiring the licensee to make the modifications before that time would impose unnecessary hardship on the licensee without a compensating increase in the level of safety.

V. Conclusions

The staff has determined that relief from the inservice flow measurements of the recently installed pumps required by Section XI is justifiable. The alternatives, as proposed by Florida Power and Light Company, will provide an acceptable level of safety. Relief may be granted pursuant to paragraph 10 CFR 50.55a(g)(6)(i) based on our finding that certain specific requirements of the Code are impractical, and the alternatives proposed for the relatively short operational time until the refueling outages will provide an acceptable level of safety. The granting of this relief is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest giving due consideration to the burden that could result if the requirements were imposed on the facility.

Dated:

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