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SUBJECT: Provides addl info re 870722 verbal request for discretionary enforcement. Revised chemical & vol control sys analysis confirms that as-found condition of piping run meets applicable functionality criteria, thus line operable.

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FLORIDA POWER & LIGHT COMPANY

JULY 23 1987
L-87-311

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
CVCS Support Analysis

The purpose of this letter is to provide additional information regarding FPL's verbal request to the NRC Region II staff for discretionary enforcement on July 22,1987.

A recently completed walkdown of small piping and instrument tubing of the boric acid addition portion of the chemical and volume control system (CVCS) as part of the Select Systems program, identified deficiencies requiring engineering disposition. Engineering was requested to perform an as found functionality determination for the section of piping between boric acid filter 4P202 and flow transmitters FT-4-110 and FT-4-113. Using conservative stress modeling assumptions for existing supports, the functionality analysis results predicted large deflections which would not be expected to occur by a more realistic modeling of the supports and the physical limitations. It was determined that a refined stress model calculation would be necessary. In parallel with the revised calculation, corrective action was recommended to be implemented on an expedited basis. This corrective action was initiated to bring this piping system beyond functionality and into compliance with the more stringent FSAR criteria.

It should be noted that on the basis of historical or statistical seismic activity, Turkey Point is located in a sesmically inactive area far from any recorded damaging shocks.

Although it was FPL's judgement that the deflections and resultant pipe stresses discussed above were unrealistic, action was taken to determine the operability of the systems while the enhancements and further calculations were in progress. As a conservative measure, the line was declared technically out-of-service and the NRC was contacted regarding the application of discretionary enforcement to the situation.

One difficulty in the operability determination is the current custom technical specification for the CVCS. No action statement is provided to address continued operation with this line out of service. The standard technical specifications (STS), including the FPL submitted version under the PEP program, would allow 72 hours operation with this line out of service.

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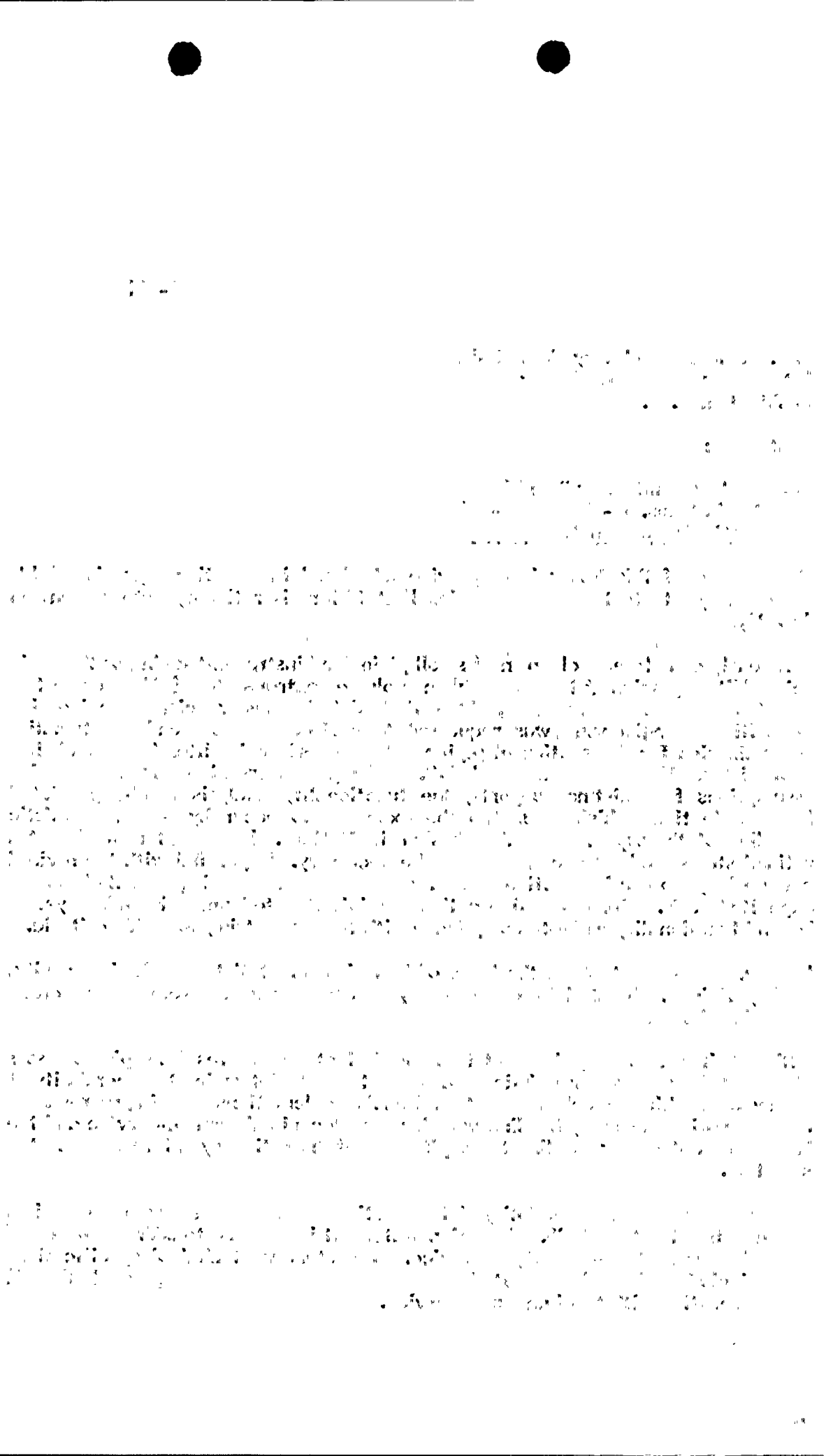

As required by our current technical specifications the availability of the borated water flow path from the refueling water storage tank was verified. This verification, the low seismic activity of the area, and the general guidance of the STS, provided the basis for our request. A 48 hour extension of operation was granted by Region II.

During the night of July 22, 1987, the analysis was subsequently performed with more realistic modelling of the as-found condition. This analysis has now been reviewed. We are pleased to report that the revised analysis confirms that the as-found condition of the piping run meets the applicable functionality criteria; thus the line was operable. The evaluation also concluded that the modified condition of the piping will be adequately supported to meet FSAR requirements.

We would like to express our appreciation for the support and prompt action provided by the Region II and NRR staffs, in response to our request.

Should there be any questions on this information, please contact us.

Very truly yours,

for C. O. Woody
Group Vice President
Nuclear Energy

COW/PLP/gp

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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