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SUBJECT: Forwards supplemental response to IE Bulletin 80-11 in response to request for addl info made in Insp Repts 50-250/87-21 & 50-251/87-21.

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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
IE Bulletin 80-11 Supplemental Response

Enclosed is our supplemental response to IE Bulletin 80-11 for Turkey Point Units 3 and 4. This response is provided to answer a request for additional information made in NRC Inspection Report 50-250/87-21 and 50-251/87-21.

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

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/SDF/gp

Attachment

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

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TURKEY POINT UNITS 3 & 4
SUPPLEMENTAL RESPONSE TO IEB 80-11 FOR
NRC INSPECTION REPORT 50-250/87-21 AND 50-251/87-21

BACKGROUND

NRC Inspection Report 50-250/87-21 and 50-251/87-21 requested FPL to provide a supplemental response to IEB 80-11 regarding the controls to prevent installation of safety related equipment in the proximity of non-seismically designed masonry walls. This response is also to address the completion of the prism tests and the use of elastic methods of analysis to evaluate all masonry walls with the exception of the steam generator feedpump enclosure walls.

EVALUATION

With regards to the remaining NRC questions, the following response to each item is provided.

1. **Design Controls**

The control to prevent installation of safety related equipment in the proximity of non-seismically designed masonry walls is accomplished through the Standard Engineering Package (EP). The EP is a document required for all design changes at Turkey Point, and must be approved by Power Plant Engineering prior to issue to the plant. As with all design output documents, engineering is required to perform a design review in accordance with internal Quality Instructions (QI's). The design review would include any potential seismic interactions as discussed above. In addition, as part of the format guide and instructions for EP's, it is a mandatory design consideration to address the routing of systems and components on or in the vicinity of masonry walls.

The major A/E for Turkey Point, Bechtel, has additional controls in the form of an EP checklist. The checklist specifically addresses the collapse of non-seismic walls onto safety related equipment. This checklist is required, procedurally, for any Bechtel generated EP.

Prior to the use of the present EP format, similiar controls were in place via the QI's and Bechtel's procedures for design of plant modifications.

In summary, the controls discussed above provide a sufficient review process to prevent the installation of safety related equipment in the proximity of non-seismically designed masonry walls.

2. **Prism Test**

The final report for the prism test was completed by Bechtel in late January. The report documents the implementation of the test program and provides an evaluation of the material test results against the criteria used in the masonry wall analysis. Because of the limited availability of samples, the total number of tests performed was less than that originally proposed. However, after evaluation of the test results, the masonry materials were shown to be adequate to permit walls to withstand all postulated loads without adversely affecting safety related equipment.

3. **Methods of Analysis**

The engineering effort under IEB 80-11 is complete for Turkey Point Units 3 and 4. The completed analysis used working stress criteria to completely qualify all safety related masonry walls with the exception of the safety related steam generator feed pump (SGFP) enclosure walls. For the loading combination involving pressure loads resulting from the postulated break in the feedwater pump discharge line, arching action theory was used to qualify these SGFP enclosure walls. This method of analysis was specifically approved by the NRC office of Nuclear Reactor Regulation (NRR) during review of FPL's response to IEB 80-11. For all other load cases on these enclosure walls, the working stress criteria was used for qualification.

Summary

The above provides engineering response to questions from the NRC on IEB 80-11, as discussed in Inspection Report 50-250/87-21 and 50-251/87-21.

References

1) NRC Inspection Report 50-250/87-21 and 50-251/87-21.