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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

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 RECIPIENT AFFILIATION: Docketing & Services Branch

SUBJECT: Comment supporting & opposing proposed rule 10CFR50, App J re primary reactor containment leakage testing.

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Secretary
U. S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
1717 H Street, N.W., Room 1121
Washington, D. C. 20555

OFFICE OF SECRETARY
DOCKETING AND SERVICE
BRANCH

Mr. Secretary:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed Rule Change - 10 CFR 50 Appendix J

Florida Power & Light Company (FPL) provides the following comments concerning the proposed rule change to 10 CFR 50 Appendix J - Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors, published in the Federal Register, February 29, 1988.

- (1) FPL endorses the addition of the Mass Point methodology to acceptable leakage rate calculational methods already incorporated into Appendix J.
- (2) FPL disagrees with the coupling of the Mass Point methodology with a 24 hour test period.

Bases: Test period length should be based on the time necessary to gather enough data with a degree of accuracy to obtain a 95% confidence level that the measured leakage rate is accurate. This is a statistical requirement independent of methodology. Coupling this methodology with a minimum 24 hour test period will severely limit its use.

FPL appreciates this opportunity to comment on this rule change.

Very truly yours,

W. F. Conway
Acting Group Vice President
Nuclear Energy

WFC/RG/gp

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

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