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SUBJECT: Forwards response to Followup Item 12 from NRC Audit Rept 50-251/89-203 re qualification of concrete pedestals for replacement component cooling water HXs.Results of revised analyses indicate that piping/support sys acceptable.

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U. S. Nuclear Reactor Regulation
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Attn: Hai-Boh Wang

Re: Turkey Point Unit 4
Docket No. 50-251
Response for
NRC Inspection Followup Item 50-250/251-89-203-12
Qualification of the Concrete Pedestals
for Replacement CCW Heat Exchangers

The attached information is the FPL followup response to NRC Design Validation Inspection Open Item NIR 50-250/251-89-203-12 on the Qualification of the Unit 4 CCW Heat Exchanger Concrete Support Pedestals. If there are any questions concerning this material, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP/DRP/MKA/mka

Enclosure

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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FPL Follow-up Item IFI 89-203-12

During the NRC's PEP 4 Audit (NIR 89-203) of Turkey Point Nuclear Plant, dated November 22, 1989, questions were raised regarding flexibility (in the north-south direction) of the Unit 4 Component Cooling Water Heat Exchanger concrete support pedestals. This resulted in an Inspection Follow-up Item (IFI).

Florida Power & Light Company (FPL) issued an audit response in October 1990 (L-90-530) for NRC review and follow-up. During preparation for the scheduled NRC follow-up review in February 1991, discrepancies were discovered by Bechtel/FPL which required further review and evaluation of the structural capacity of the concrete pedestals. FPL advised the NRC of this discovery and requested additional time for review. As a result, the follow-up item was not closed by the NRC in February 1991.

In March 1991, a calculation was prepared to address the discrepancies which affected the structural capacity of the existing concrete support pedestals. In addition, this calculation investigated structural characteristics of the heat exchanger/pedestal structural framing system and determined a more realistic representation of the surface stiffness. Results of this calculation show that the reinforced concrete pedestals meet all UFSAR design requirements.

In view of the more realistic value of stiffness (flexibility) of the structural framing system, the CCW and ICW piping systems were re-analyzed. Accordingly, the results of these analyses were used to qualify the piping systems, the associated pipe supports, and the CCW Heat Exchangers. These analyses established consistent bases for all analyses associated with the CCW System.

In summary, the results of the revised analyses performed in response to IFI 89-203-12 have demonstrated that the piping and support systems reviewed satisfy all of the applicable design requirements in accordance with the provisions of the UFSAR and governing codes. These calculations are available for your final review.