

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

MA9

ACCESSION NBR: 8304210184 DOC. DATE: 83/04/15 NOTARIZED: YES DOCKET #  
 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  
 AUTH. NAME AUTHOR AFFILIATION  
 UHRIG, R.E. Florida Power & Light Co.  
 RECIPIENT NAME RECIPIENT AFFILIATION  
 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 82-33 (NUREG-0737, Suppl 1) re emergency response capability, Proposed implementing schedules encl.

DISTRIBUTION CODE: A003S COPIES RECEIVED: LTR \ ENCL \ SIZE: 7  
 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737 (Generic Ltr 82-33)

NOTES:

	RECIPIENT		COPIES		RECIPIENT		COPIES	
	ID	CODE/NAME	LTR	ENCL	ID	CODE/NAME	LTR	ENCL
	NRR	ORB1 BC	7	7				
INTERNAL:	IE/DEPER/EPB		3	3	NRR/DHFS/HFEB		1	1
	NRR/DHFS/PSRB		1	1	NRR/DL/ORAB		1	1
	NRR/DL/ORB5		5	5	NRR/DSI/CPB		1	1
	NRR/DSI/ICSB		1	1	NRR/DSI/METB		1	1
	NRR/DSI/RAB		1	1	NRR/DSI/RSB		1	1
	<u>REG FILES</u>		1	1	RGN2		1	1
EXTERNAL:	LPDR		1	1	NRC PDR		1	1
	NSIC		1	1	NTIS		1	1

Add: W. Paulson

TOTAL NUMBER OF COPIES REQUIRED: LTR

30  
29

ENCL

30  
29





April 15, 1983  
L-83-237

Office of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4  
Docket No. 50-250 & 50-251  
Supplement 1 to NUREG 0737  
Generic Letter 82-33

Your letter dated December 17, 1982 transmitted Supplement 1 to NUREG 0737 (Generic Letter No. 82-33). This Supplement distilled the basic requirements for five NUREG 0737 items regarding Requirements for Emergency Response Capability. It also requested that we develop our own plant specific schedule for integrating these items and implementing whatever modifications are deemed necessary.

We have participated continually in the Nuclear Utility Task Action Committee (NUTAC) on Emergency Response Capabilities, which includes over 40 utilities and is administratively supported by INPO. We have factored into our schedule the guidance developed by the NUTAC on integrating these initiatives. Since we have already accomplished a significant amount of work on these, as well as other NUREG 0737 items, we were forced to deviate somewhat from the "idealized" integration scheme, but have generally followed its outline.

The following are our status and proposed implementing schedules for the items in Supplement 1 to NUREG 0737:

SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

A. TURKEY POINT UNIT 3

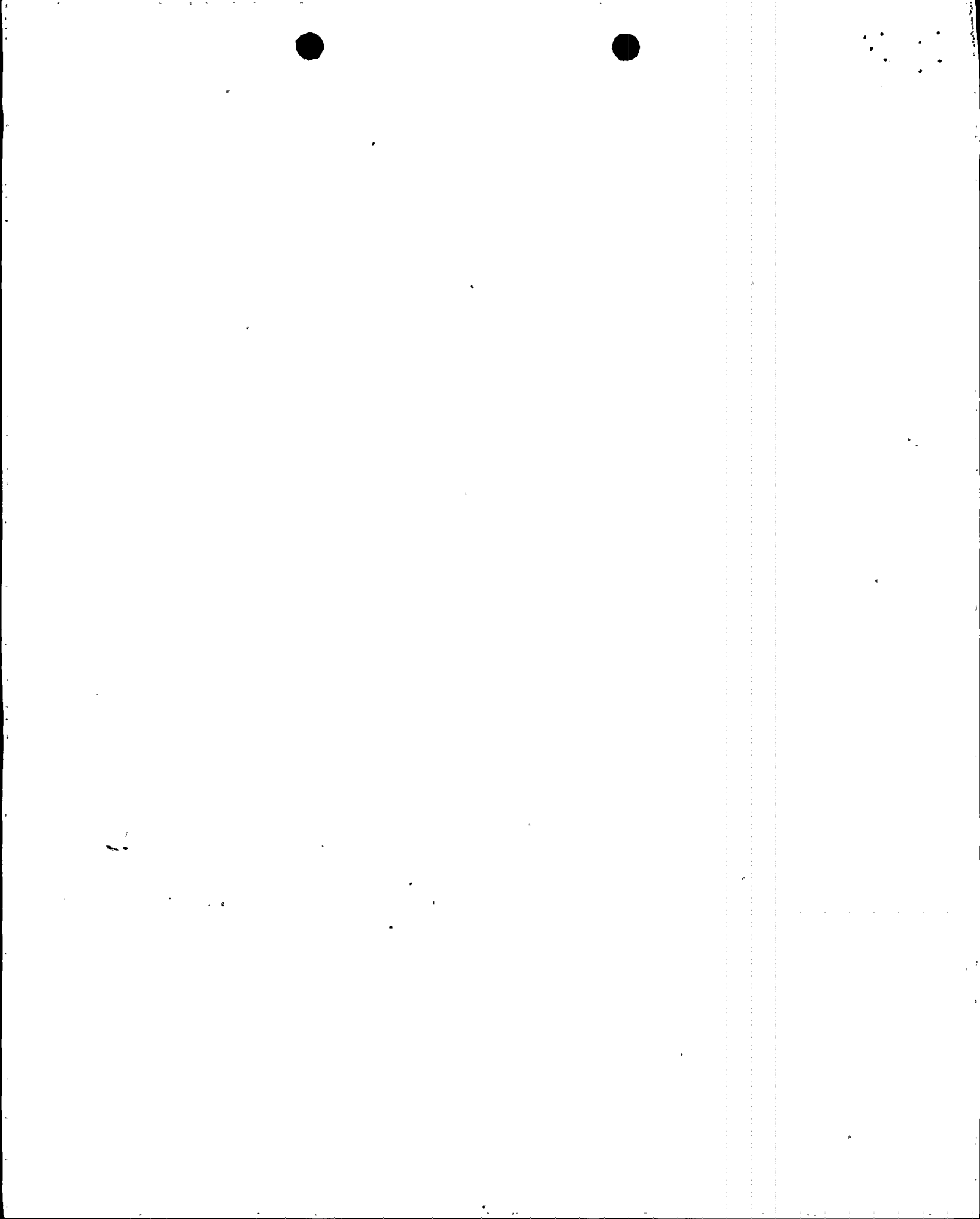
1. Current Status

The parameter selection in accordance with NUREG 0696 and the functional design specification has been completed. The hardware has been manufactured and is scheduled to be tested and delivered to the site by June 1983. The isolation

A003

ADD:  
W. Paulson

8304210184 830415  
PDR ADDCK 05000250  
F PDR



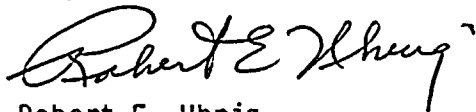
3. Emergency Offsite Facility (EOF) - The location of our EOF is at the FPL General Office located greater than 20 miles (about 24 miles) from the site. Accordingly, in L-81-447, dated October 13, 1981, we submitted a request for a specific approval by the Commission in accordance with Generic Letter 82-10. To date, we have had no response on our request from the NRC.

We are proceeding to implement the necessary physical modifications and are adding the required communication equipment. However, we are at this time unable to provide a schedule for full operational capability of the EOF pending NRC response to our request.

It should be noted as stated in the SPDS discussion, that the SPDS will not be in operation prior to startup from the Spring 1985 and Spring 1984 Refueling Outage for Turkey Point Unit 3 and 4, respectively. The SPDS will be provided in the EOF and TSC at that time. However, we consider the SPDS to be an additional aid to emergency recovery, and not a requirement for the ERFs to be operational.

We look forward to discussing these schedules with our Project Manager to arrive at a mutually acceptable schedule. FPL has devoted considerable time and effort in the past to implementing NUREG 0737 requirements. It is our opinion that with these previous modifications and upgraded plant operations, the continued operation of the plant should pose no threat to the health and safety of the public with consideration of our implementation schedule for Supplement 1 to NUREG 0737.

Very truly yours,



Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/JEM/js

cc: Mr. James P. O'Reilly, Region II  
Mr. Harold F. Reis, Esquire



cabinets for safety related instrumentation signals will be installed prior to the end of Fall 1983 Refueling Outage. The software is being tested at the factory.

2. Submittal of Parameter Selection Basis and SPDS Implementation Plan Report.

The reports describing the parameter selection and definition along with the implementation plan will be submitted by May 1, 1984.

3. Date When SPDS Will Be Operable and Operators Trained

The SPDS will be operational prior to startup from the Spring 1985 Refueling Outage. The verification and validation of the SPDS and operator training will be completed prior to the SPDS becoming operational.

B. TURKEY POINT UNIT 4

1. Current Status

The parameter selection in accordance with NUREG 0696 has been completed. The functional design specification has been completed.

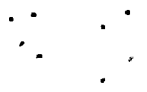
The hardware has been manufactured and is scheduled to be tested and delivered onsite by June 1983. The isolation cabinets for safety related instrumentation signals will be installed prior to the end of the Spring 1983 Refueling Outage. The software is being tested at the factory.

2. Submittal of Parameter Selection Basis and SPDS Implementation Plant Report.

The reports describing the parameter selection and definition along with the implementation plan will be submitted by May 1, 1984.

3. Date When SPDS will be Operable and Operators Trained

The SPDS will be operational prior to startup from the Spring 1984 Refueling Outage. The verification and validation of the SPDS and operator training will be completed prior to the SPDS becoming operational.





DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

A. TURKEY POINT UNITS 3 & 4

1. Current Status

The DCRDR for Unit 3 has been completed except for the review of the SPDS. A Human Factors Engineering design of the SPDS will integrate the abbreviations and color coding into that of the control room design. In view of the progress to date, the requirements to submit the program plan within two months of the start of the DCRDR has been superceded. With the issuance of Supplement 1, and the finalization of NRC requirements, we will now prepare the required documentation.

2. Submittals

The management plan describing our DCRDR program will be submitted by June 1, 1983. A summary report of the completed review, describing the Human Engineering discrepancies review and assessment and proposed implementation schedule will be submitted by November 1, 1983. Actual modifications to the control room will be dependent upon NRC review and approval fo the summary report.

REGULATORY GUIDE 1.97 REV. 2

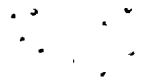
A. TURKEY POINT UNITS 3 & 4

1. Current Status

We have reviewed our existing accident monitoring instrumentation and control systems against the requirements of Regulatory Guide 1.97, Rev. 2. We are presently assessing the deviations found and are developing the schedule for required modifications, if any.

2. Submittals

The evaluation report of the plant instrumentation, schedule for any required modifications, and justification of any deviations not requiring modifications will be submitted by March 1, 1984. Actual modifications will be dependent upon review and approval by the NRC.



UPGRADE EMERGENCY OPERATING PROCEDURES (EOPs)

A. TURKEY POINT UNITS 3 & 4

1. Current Status

The revision of several Turkey Point EOPs is in progress. These revisions conform to the Westinghouse Owners Group (WOG) Basic revision Emergency Response Guidelines (ERG) in both technical content and general format. A concerted effort on the entire EOP package cannot be made at this time. The WOG Revision 1 ERG and WOG Writer's Guide is currently being written and may be received by June 1983. Revision 1 is expected to generally conform to the Basic revision although extensive changes may occur in certain areas.

Virtually all the EOPs will be revised to some degree. The WOG Writer's Guide will be used to write a plant specific writer's guide. Deviations from WOG supplied material will be documented. The Turkey Point Writer's Guide will become part of the Procedures Generation Package (PGP). After completion of the PGP the EOP revision process will continue, using the Turkey Point Writer's Guide and WOG Revision 1 ERG.

2. Submittals & Implementation

- a) Submittal Date for the Generic Technical Guidelines  
The generic ERG have been submitted by the WOG to the NRC. The Commission has approved these technical guidelines.
- b) Submittal Date for the Procedures Generation Package  
The PGP developed for Turkey Point will include the following:
  - ( i) A plant specific writer's guide, developed from the WOG generic writer's guide (when received).
  - ( ii) A description of the EOP validation program. This program's approach has not yet been determined. However, it will definitely include plant and control room walk-throughs. Some simulator work may be necessary.
  - (iii) A description of the EOP training program. Training program specifics have not been determined. The training program (and validation program) scope will be determined after receipt of the Revision 1 ERG from the WOG.



The PGP will undergo an in-house review and revision process before submittal to the NRC.

The PGP will be submitted to the NRC by March 1, 1984.

C. Date for Implementation of the EOPs

The following requirements must be met before the Turkey Point EOPs can be implemented:

- ( i) Upgrade EOPs to WOG Revision 1 guidelines.
- ( ii) Document all changes from existing EOPs to upgraded EOPs.
- (iii) Document all changes from WOG Revision 1 guidelines to plant specific EOPs.
- ( iv) Review completed EOPs.
- ( v) Validate completed EOPs.
- ( vi) Train all licensees in the use of EOPs.

This effort can be completed in approximately one year's time after submittal of the Procedures Generation Package. The date given below is based upon NRC acceptance of the PGP as submitted (PGP review takes place concurrent with EOP revision, validation, etc.)

The planned date for implementation of the EOPs at Turkey Point Units 3 & 4 is December 31, 1984.

EMERGENCY RESPONSE FACILITIES (ERFs)

Supplement 1 requires that we provide the operational dates for the ERFs.

A. TURKEY POINT UNITS 3 & 4

1. Technical Support Center (TSC) - The TSC is complete and operational except for the availability of backup electrical power. The backup electric power supply will be available prior to startup of Unit 3's Fall 1983 Refueling Outage.
2. Operational Support Center (OSC) - The OSC is currently operational.



STATE OF FLORIDA            )  
  )  
COUNTY OF PALM BEACH )    ss.


Robert E. Uhrig, being first duly sworn, deposes and says:

That he is Vice President of Florida Power & Light Company, the Licensee herein;

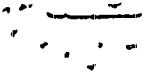
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

  
Robert E. Uhrig

Subscribed and sworn to before me this  
15 day of April, 1983.

  
Cheryl J. Fredrick  
NOTARY PUBLIC, in and for the County  
of Palm Beach, State of Florida.

My commission expires: Notary Public, State of Florida at Large  
My Commission Expires October 30, 1983  
Bonded thru Maynard Bonding Agency.



92

.....

.....

.....