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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
AUTH. NAME AUTHOR AFFILIATION
WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to Generic Ltr 87-02, "Verification of Seismic Adequacy of Mechanical & Electrical Equipment in Operating Reactors," NUREG-1030 & NUREG-1121. Updated response will be submitted by 871001.

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FPL

MAY 15 1987
L-87-217

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
St. Lucie Unit 1
Docket No. 50-335
Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors (Generic Letter 87-02)

Florida Power & Light Company (FPL) has reviewed Generic Letter 87-02 (GL 87-02) with NUREGs 1030 and 1211. This letter provides the response requested in the generic letter. A copy of the generic letter was received by the Nuclear Licensing Department of FPL on April 3, 1987.

It has been generally acknowledged that FPL's Turkey Point and St. Lucie sites are located in an area of low seismic hazard. Recent industry and FPL studies using current data together with probabilistic analytical techniques have indicated that the seismic hazard at the Turkey Point and St. Lucie sites is even lower than previously considered and that at an acceptable level of risk, the values of the seismic forces associated with the Safe Shutdown Earthquake (SSE), are significantly below the values being used currently for design analysis, thus providing inherent seismic margin.

From an economic perspective, a preliminary review of the costs and benefits associated with the proposed resolution of Unresolved Safety Issue (USI) A-46, as applied to Turkey Point Units 3 and 4, and St. Lucie 1,has indicated that the benefits appear to be less than those identified by the generic backfit analysis in NUREG 1211.

A number of issues involving seismicity are presently being addressed by the NRC and the utility industry, (e.g., Eastern USA Seismicity studies, Decay Heat Removal studies and Seismic Margins studies), with proposed revisions to 10CFR100 Appendix A. To assure consistency, FPL would like to address A-46 within the context of these other issues.

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It is anticipated that the final reports by EPRI on Eastern USA Seismicity and by Sandia on Decay Heat Removal will be issued in the next few months. At that time, FPL proposes to use this and other applicable data to document FPL's position for staff review to demonstrate the very low seismic hazard and the existence of seismic margin at the Turkey Point and St. Lucie sites and to assure the NRC that the concerns expressed in USI A-46 do not apply to Turkey Point Units 3 and 4 and St. Lucie Unit 1.

We will provide an update on this response by October 1, 1987. Considering the low seismic hazard at FPL's Turkey Point and St. Lucie sites, this time frame is warranted.

Very truly yours,

H. N. Paduano Jr.
for C. O. Woody
Group Vice President
Nuclear Energy

COW/JRL/cn
1/011

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