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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 AUTH.NAME AUTHOR AFFILIATION
 CONWAY, W.F. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 GRACE, J.N. Region 2, Ofc of the Director

SUBJECT: Requests discretionary enforcement for extending action statement time for replacement of 3B CSP pullout assembly.

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AUGUST 10 1988

L-88-347

Dr. J. Nelson Grace
 Regional Administrator, Region II
 U.S. Nuclear Regulatory Commission
 101 Marietta Street, N. W., Suite 2900
 Atlanta, Georgia 30323

Dear Dr. Grace:

Re: Turkey Point Unit 3
 Docket No. 50-250
 Request for Discretionary Enforcement for
 Extending the Action Statement Time for
The Replacement of the 3B CSP Pullout Assembly

During recent testing of the 3B containment spray pump (CSP), the temperature for the "inboard" bearing has steadily increased to over 180°F, operating surveillance procedure (OSP) 3-OSP-068.2, Containment Spray Pump Inservice Test, states that the maximum temperature value for the "inboard" bearing is 180°F. If this limit is exceeded, the respective CSP is declared inoperable and corrective action is initiated.

The 180°F limitation included in 3-OSP-068.2 is principally based upon a reference to that value in the original manual for the CSPs from the pump manufacturer. The manual is generic for the pumps and is not specific to this Turkey Point application. Discussions with the pump vendor concerning bearing temperature occurred in 1979. In their response, they indicated that a normal operating band of "180-181°F" was not a cause for alarm although it is above the expected ideal band for this model pump. The letter further states that concern should be raised for upward changes in temperature 15-20°F above our "normal operating range." Comparison of the 1987 and 1988 test results show a temperature rise of 8°F, an increase of 5%. Based on this and the test conditions under which these temperatures were

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Florida Power & Light Company (FPL) has evaluated the increased temperature and determined that the 3B CSP is operable in its current configuration. However, the bearing temperature and upward trend identify a less than ideal condition. Therefore the pullout assembly (a pullout assembly is the pump proper less the casing) should be replaced as soon as practical.

The "spare" pullout assemblies were purchased to be functionally identical to the original assemblies. They have the same flow and head requirements, the same pump curve and the same fit. They use the existing casing and their impellers are identical in design. These are key factors affecting pump performance and as they are identical, no change in design performance is expected.

The current Technical Specification (TS) action statement for a CSP out-of-service is 24 hours. If the CSP is not returned to service, the unit is to be placed in HOT STANDBY within 6 hours. If the CSP is not returned to operable status within an additional 48 hours, the unit shall be placed in HOT SHUTDOWN within 6 hours and in COLD SHUTDOWN within the next 24 hours. The new pullout assemblies have not been installed into these pumps before. Since this is the first time this change out is being attempted, 24 hours action statement may not provide enough time for change out and testing within the 24 hour action statement. Every effort will be made to complete the change out and testing within the 24 hour action statement. During the change out a second maintenance crew will be inspecting the pullout assembly removed from the 3B CSP and repairing it as necessary. This is being done in the event that the old pullout assembly would have to be reinstalled in the 3B CSP. In order to perform the repairs, FPL requests discretionary enforcement on a one time basis to take the 48 hours allowed in HOT STANDBY and add that 48 hours to the 24 hours currently allowed during power operation. If the pump is not returned to operable within this 72 hour limit the unit will be placed in HOT STANDBY within the next six hours and COLD SHUTDOWN within the following 30 hours.

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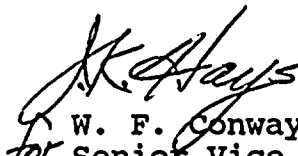
The proposed action statement of 72 hours with the 3B CSP out-of-service is acceptable based on the following reasons:

- 1) The Westinghouse Standard Technical Specifications state that with one containment spray system inoperable, restore the inoperable Spray system to operable status within 72 hours, or be in at least HOT STANDBY within 6 hours; restore the inoperable spray system to operable status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.
- 2) The Proof and Review copy of the TS upgrade project recently received from the NRC states that with one containment spray system inoperable restore the inoperable spray system to operable status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- 3) Prior to taking the 3B CSP out-of-service, the 3A CSP will be tested to demonstrate operability as required by existing TS 3.4.2.b.2.
- 4) During the 72 hour time period, the three (3) emergency containment coolers and the three (3) emergency containment filters will be operable and not taken out-of-service.

Based on the above, the 48 hour extension of the action statement for the 3B CSP is acceptable and will not affect the health and safety of the public.

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

Very truly yours,


W. F. Conway
for Senior Vice President -- Nuclear

WFC/SDF/gp

cc: Document Control Desk, USNRC
Dr. G. E. Edison, Project Manager, NRR, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

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DISTRIBUTION

Docket File w/o encl.
PDII-2 Rdg. w/o encl.
GEdison, w/encl.
DMiller, w/encl.

August 9, 1988

DOCKET NO(S). 50-250/1

Mr. R. F. Conway
Senior Vice President-Nuclear
Nuclear Energy Department
Florida Power and Light Company
P. O. Box 14000
Juno Beach, Florida 33408-0420
SUBJECT: TURKEY POINT UNITS 3 AND 4

The following documents concerning our review of the subject facility are transmitted for your information.

- Notice of Receipt of Application, dated _____.
- Draft/Final Environmental Statement, dated _____.
- Notice of Availability of Draft/Final Environmental Statement, dated _____.
- Safety Evaluation Report, or Supplement No. _____ dated _____.
- Environmental Assessment and Finding of No Significant Impact, dated _____.
- Notice of Consideration of Issuance of Facility Operating License or Amendment to Facility Operating License, dated _____.
- Bi-Weekly Notice; Applications and Amendments to Operating Licenses Involving No Significant Hazards Considerations, dated 07/27/88 [see page(s)] _____.
- Exemption, dated _____.
- Construction Permit No. CPPR-_____, Amendment No. _____ dated _____.
- Facility Operating License No. _____, Amendment No. _____ dated _____.
- Order Extending Construction Completion Date, dated _____.
- Monthly Operating Report for _____ transmitted by letter dated _____.
- Annual/Semi-Annual Report- _____
_____ transmitted by letter dated _____.

Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:
As stated

cc: See next page

OFFICE	LA/PDII-2						
SURNAME	DMiller:bd						
DATE	08/01/88						