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ACCESSION NBR: 8911080276      DOC. DATE: 89/10/31      NOTARIZED: YES      DOCKET #  
 FACIL: 50-000 Generic Docket      05000000  
     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  
     50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.      05000335  
     50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.      05000389  
 AUTH. NAME      AUTHOR AFFILIATION  
 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                                  Document Control Branch (Document Control Desk)

SUBJECT: Responds to Generic Ltr 88-20, "Initiation of Individual Plant Exams for Severe Accident Vulnerabilities."

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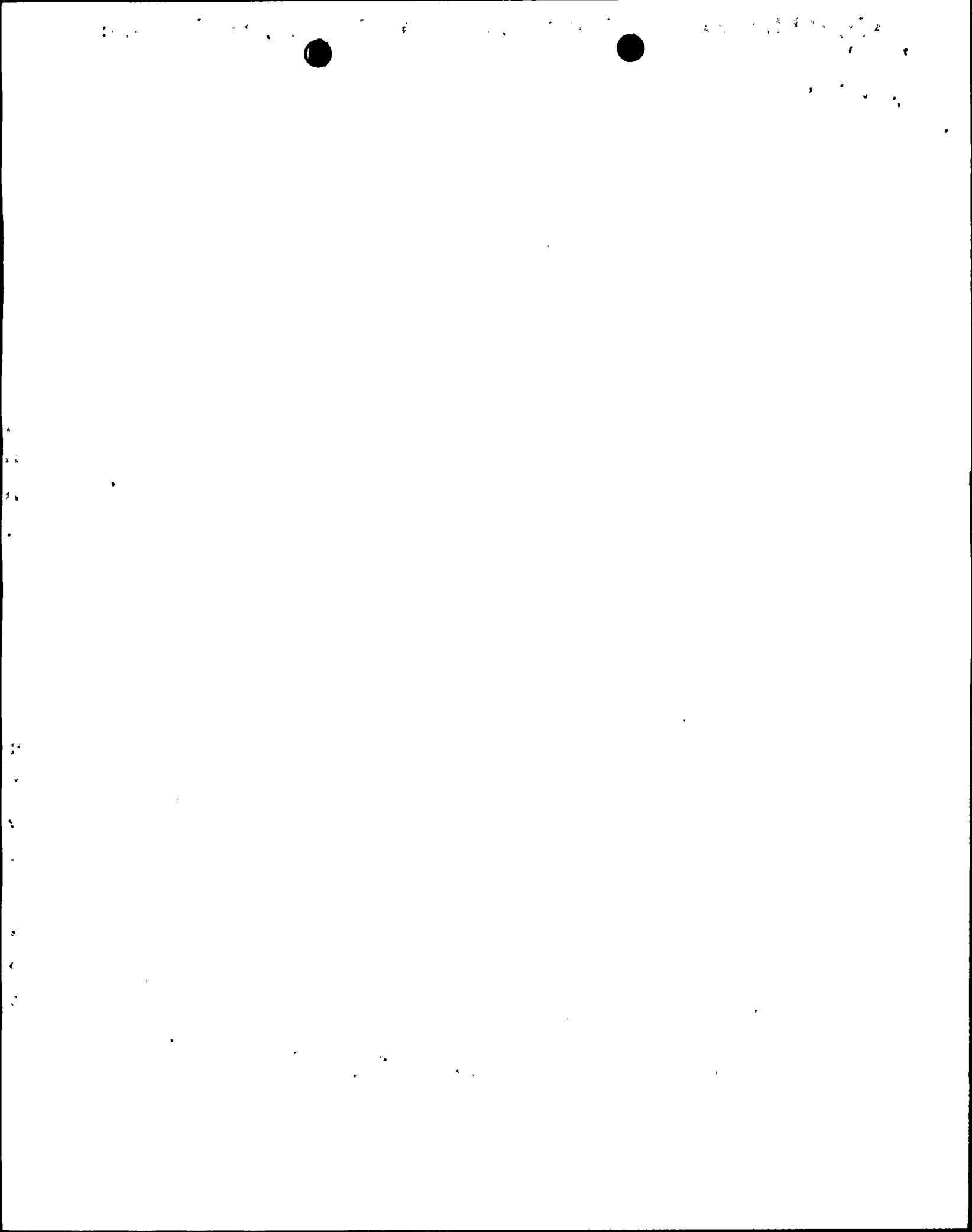
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OCTOBER 31 1989

L-89-389  
10 CFR 50.54(f)

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 Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Individual Plant Examinations for  
Severe Accident Vulnerabilities,  
Generic Letter 88-20

By Generic Letter (GL) 88-20, dated November 23, 1988, the NRC requested licensees to perform an Individual Plant Examination (IPE) to assess severe accident vulnerabilities for each licensee plant and submit the results of the IPE to the NRC. By Federal Register notice dated September 1, 1989, the NRC announced the availability of NUREG-1335, "Individual Plant Examinations: Submittal Guidance" and the initiation of the IPE process. Licensees are requested to submit, by October 31, 1989, proposed programs for completing IPEs. As requested by GL 88-20, attached is the FPL IPE Program Plan for Turkey Point Units 3 and 4 and St. Lucie Units 1 and 2.

Should you have any questions on this information, please contact us.

Very truly yours,

J. H. Goldberg  
Executive Vice President

JHG/WFK/gp

Attachments

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

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ATTACHMENT 1

IPE PROGRAM PLAN  
TURKEY POINT UNITS 3 AND 4  
ST. LUCIE UNITS 1 AND 2

1. NRC REQUEST

Identify the method and approach selected for performing the IPE.

FPL RESPONSE

FPL will perform a Level 1 Probabilistic Risk Assessment (PRA) for Turkey Point Units 3 and 4 and St. Lucie Units 1 and 2.

A containment performance analysis will also be done, following the guidance of Appendix 1 to GL 88-20.

The current scope of the Turkey Point study includes the internal flooding and fire events and hurricane external event.

Science Applications International Corporation is supporting FPL in the conduct of the Turkey Point IPE. Approximately fifty percent of the analysis will be conducted by FPL personnel.

PRA technology transfer is a major objective of the Turkey Point study. FPL's goal is to be in a position to conduct the St. Lucie IPE with a minimum reliance on a contractor. This goal is reflected in the milestone schedule discussed below.

2. NRC REQUEST

Describe the method to be used, if it has not been previously submitted for staff review.

FPL RESPONSE

Since FPL has selected the PRA approach to satisfy the GL 88-20 request, we will employ current PRA methods and information as discussed in Section 4.1 of GL 88-20.

The Turkey Point Plant is in the process of a number of major upgrades. These modifications will impact the assumptions and models of the IPE.

Attachment 1 (con't)

For Turkey Point, a cut-off date of November 30, 1990, has been established. Modifications implemented (completed and turned over to the plant operations department) by this date will be included in the IPE submittal. Modifications implemented after this date will be included in later revisions to the PRA. Major planned modifications such as the Emergency Power System upgrade, which are not in place as of November 30, 1990, will not be included in the IPE submittal. This is necessary in order to meet the existing NRC schedule. A similar philosophy will be used for the St. Lucie IPE.

3. NRC REQUEST

Identify the milestones and schedules for performing the IPE and submitting the results to the NRC.

FPL RESPONSE

FPL will perform the plant examinations for Turkey Point and St. Lucie consecutively beginning with the Turkey Point units. The milestones for performing these examinations and for submitting the results are indicated in Attachment 2. A formal, independent review by FPL engineers will be performed on the documentation packages and at several milestones in the examination to validate the process and the results.

ATTACHMENT 2

IPE PROGRAM PLAN  
TURKEY POINT UNITS 3 AND 4  
ST. LUCIE UNITS 1 AND 2

<u>MILESTONE</u>	<u>DATE(s)</u>
Commence Turkey Point IPE	August, 1989 (underway)
Detailed Planning for St. Lucie IPE	May, 1990 - November, 1990
Finalize Turkey Point PRA Configuration	November, 1990
Complete, Submit Turkey Point IPE	June, 1991
Commence St. Lucie IPE	July, 1991
Finalize St. Lucie PRA Configuration	June, 1993
Complete, Submit St. Lucie IPE	December, 1993



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

J. H. Goldberg being first duly sworn, deposes and says:

That he is Executive Vice President, of Florida Power and 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.

J. H. Goldberg  
J. H. Goldberg

Subscribed and sworn to before me this

(31 day of October), 1989.

Renee M. Wazied

NOTARY PUBLIC, in and for the County of  
Palm Beach, State of Florida

My Commission expires \_\_\_\_\_

NOTARY PUBLIC, STATE OF FLORIDA.  
MY COMMISSION EXPIRES: AUG. 5, 1993.  
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

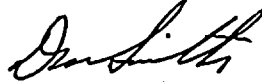
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We regret any inconvenience these additional delays may have caused. If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Smith".

Attachment

cc: R. A. Burricelli, Public Service Electric & Gas  
T. M. Gerusky, Commonwealth of Pennsylvania  
T. P. Johnson, USNRC Senior Resident Inspector  
T. E. Magette, State of Maryland  
W. T. Russell, Administrator, Region I, USNRC  
H. C. Schwemm, Atlantic Electric  
J. Urban, Delmarva Power



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## ATTACHMENT

### 1. Original Commitment

A video tape training module will be made by July 15, 1988. The tape will emphasize the various panel sensitivities, consequences of improper care, and techniques to be exercised when working near, opening, closing or working in the panels. Training will be conducted for selected personnel and will be completed by September 2, 1988.

### Previous Schedule Revision (1/31/89)

This commitment schedule was revised to indicate completion of the video tape by June 30, 1989 and completion of training for selected personnel by September 30, 1989.

### Current Schedule

The video tape will be completed by January 1990. The training for selected personnel will be completed by April 1990.

### 2. Original Commitment

Appropriate plant personnel, as designated by the various Plant Superintendents, will be trained in a "mock-up" of a control panel to become familiar with performing tests and troubleshooting under various conditions to improve their ability to avoid potential grounding situations. This training will be incorporated into the technical staff and management training program, and the continuing training program for the designated plant personnel. This training will commence by December 1, 1988.

### Original Commitment

For new plant staff personnel who will be assigned duties which involve work in critical control panels, there will be an established and structured training program. The training will include techniques and requirements for tightening and checking terminations, electrical separation, continuity testing, electrical safety, etc., and panel familiarity. This program will be developed by August 19, 1988 and will become a part of job orientation training.

### Previous Status Revision (1/31/89)

These commitment schedules were revised to indicate expected availability of the mockup panel by May 5, 1989 and completion of the training by 7/31/89

### Current Schedule

The panel is expected to be delivered to the site in November 1989. Training materials will be developed by March 1, 1990 and presented to the above site personnel by April 1, 1990.