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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  
 GOLDBERG, J.H.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Forwards "Unresolved Safety Issue A-46 & Generic Ltr 87-02" & proprietary Rev 1 to "Plant Specific Seismic Adequacy...."

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L-89-441

U. S. Nuclear Regulatory Commission  
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Gentlemen:

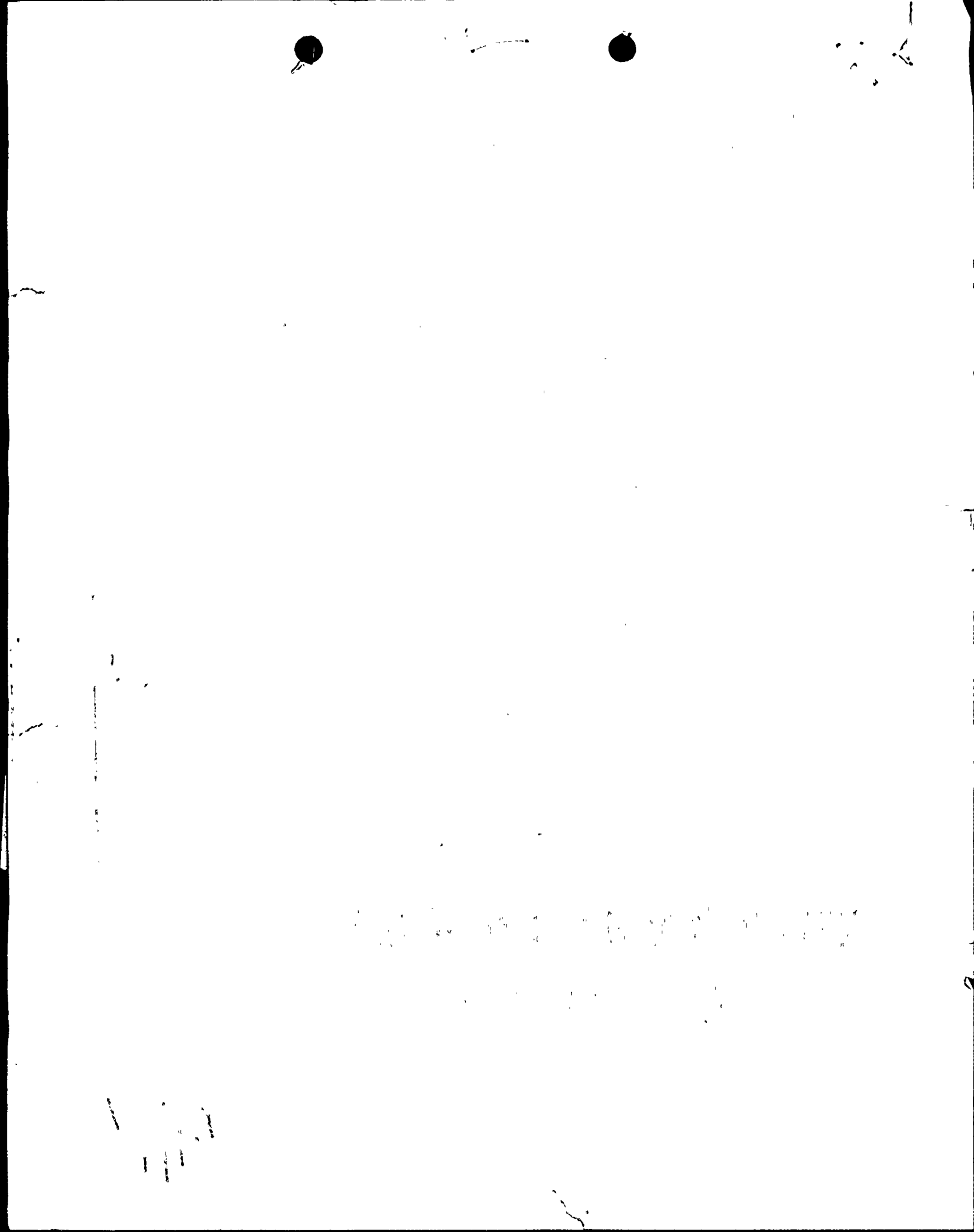
Re: St. Lucie Unit 1  
Docket No. 50-335  
Turkey Point Units 3 and 4  
Docket Nos 50-250 and 50-251  
Unresolved Safety Issue A-46  
Generic Letter 87-02

The purpose of this letter is to submit Florida Power & Light Company's (FPL)'s final implementation program together with associated documentation in response to Generic Letter 87-02 (Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors).

Appendix A to this letter provides documentation on FPL's basis for the exclusion of relays from the seismic adequacy implementation procedure. Appendix B to this letter submits FPL's final implementation program, revised per the NRC letter dated August 4, 1989 from Messrs. Jan A. Norris and Gordon E. Edison, and FPL's response letter L-89-352 dated October 2, 1989 from Mr. J. H. Goldberg. Appendix B (Revision 1) is being submitted as a proprietary document under the provisions of 10 CFR 2.790.

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PDR ADOCK 05000250  
P PDC

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FPL will schedule implementation of this procedure at Turkey Point Unit 3 and St. Lucie Unit 1 during their spring 1990 refueling outages if the NRC Safety Evaluation Report (SER) is received by January 30, 1990. Otherwise, we expect to implement the procedure at the next refueling outage for St. Lucie Unit 1 and the Emergency Power System enhancement outage for Turkey Point Units 3 & 4 in 1991. Pending receipt of your SER, FPL continues to reserve the option to exercise its rights under the provisions of 10 CFR 50.54 (f) and/or 10 CFR 50.109.

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

Very truly yours,



J. H. Goldberg  
Executive Vice President

JHG/JRL/rh

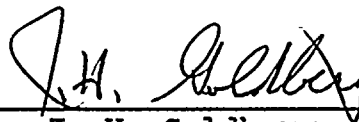
cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant  
Senior Resident Inspector, USNRC, Turkey Point Plant

AFFIDAVIT

State of Florida  
County of Palm Beach

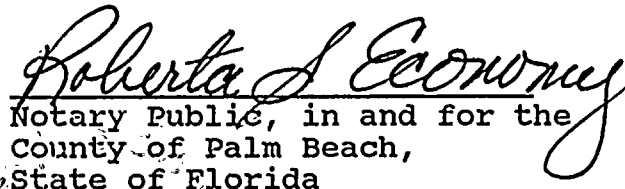
J. H. Goldberg being first duly sworn, deposes and says the following:

1. I am an Executive Vice President of Florida Power and Light (FPL) Company, the Licensee herein.
2. Appendix B submitted with letter L-89-441 consists of a specific implementation procedure for the purpose of resolving Unresolved Safety Issue (USI) A-46. The procedure includes details of organization, performance and documentation. The procedure incorporates trade secrets and privileged and confidential commercial information which is owned by FPL. The procedure is proprietary, has been held in confidence by FPL, and has never been released to the public. The procedure was developed using FPL's resources. The information contained in the procedure would unduly enrich other utilities should they be able to use it without providing compensation to FPL for that use.
3. I am aware that other nuclear utilities, acting through their utility group (Seismic Qualification Utility Group) also regard their implementation procedure for the purpose of resolving A-46 as being proprietary and confidential.
4. The statements made in this affidavit are true and correct to the best of my knowledge, information, and belief.
5. I am authorized to execute this affidavit on behalf of the said Licensee



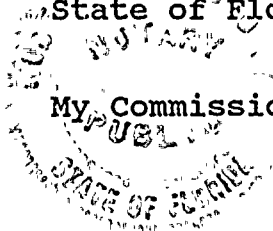
J. H. Goldberg

Subscribed and sworn to before me this 13 day of Dec. 1989.

  
Notary Public, in and for the  
County of Palm Beach,  
State of Florida

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

Notary Public, State of Florida  
My Commission Expires June 1, 1993  
Bonded Thru Troy Falm - Insurance Inc.



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