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 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

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SUBJECT: Responds to commitment for hydrogen recombiners, per Insp Repts 50-250/90-13 & 50-251/90-13.

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10 CFR 50.44

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket No. 50-250 and 50-251
Response to NRC Inspection Report Number 50-250/251-90-13
Regarding Licensees Commitment For Hydrogen Recombiners

On May 18, 1990, Florida Power and Light, during a meeting with the NRC concerning NRC Inspection 50-250/251-90-13, agreed to provide the NRC with information concerning Turkey Point's implementation of 10 CFR 50.44 "Standards For Combustible Gas Control System in Light-Water-cooled power reactors," and NUREG 0737, item II.E.4.1, "Dedicated Hydrogen Penetrations". This commitment was included as unresolved item 250, 251/90-13-01 of NRC Inspection Report 50-250/251-90-13 dated June 15, 1990.

NUREG 0737, Item II.E.4.1, requires licensees to provide containment penetration systems for external recombiner or purge systems that are dedicated to that service only and that meet the redundancy and single failure requirements of General Design Criteria 54 and 56 of Appendix A to 10 CFR 50. The penetrations must be sized to satisfy the flow requirements of the recombiner or purge system. Turkey Point Units 3 and 4 have redundant purge connections which are independent of the large containment penetrations. By letter L-80-16, dated January 11, 1980, FPL compared this design to the design criteria specified in NUREG 0578, item 215.a (TMI Item II.E.4.1). At that time, Turkey Point did not employ hydrogen recombiners.

On April 17, 1980, Schweaner (NRC) to Uhrig (FPL), the NRC provided its safety evaluation (SE) accepting Turkey Point plant's actions taken to satisfy the TMI lessons learned category "A" items. As stated in the NRC SE, FPL agreed to

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re-evaluate the flow requirements of the hydrogen purge system for a post-accident situation. Per Inspection reports 50-250/251-81-10, dated June 18, 1981, the NRC closed TMI item II.E.4.1 (NUREG 0578, item 2.1.5.a) for Turkey Point Units 3 and 4, as well as the open item from the NRC's April 7, 1980 SE, based on the design of the Turkey Point Post-Accident Containment Vent System.

On December 2, 1981, 10 CFR 50.44 was amended to require plants that do not have recombiners to have the capability to install external recombiners. Following review of the amended rule, Turkey Point elected to install piping and electrical service for the installation of an external hydrogen recombiner in accordance with 10 CFR 50.44. As stated in the NRC Inspection Report 50-250/251-90-13, Turkey Point developed an off-normal procedure providing instructions on how to obtain a hydrogen recombiner if the need arises.

Previously, Turkey Point had obtained an agreement with other utilities for the use of an external recombiner. Turkey Point is now actively evaluating a reactivation of this agreement and a possible similar agreement with a different utility group. When this agreement is completed, the hydrogen recombiner will be brought on site to verify system operability.

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

Very truly yours,


K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/DPS/ds

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

