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 AUTH. NAME AUTHOR AFFILIATION
 PLUNKETT, T.F. Florida Power & Light Co.
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SUBJECT: Responds to NRC Bulletin 88-011, "Pressurizer Surge Line Thermal Stratification," issued on 881220.

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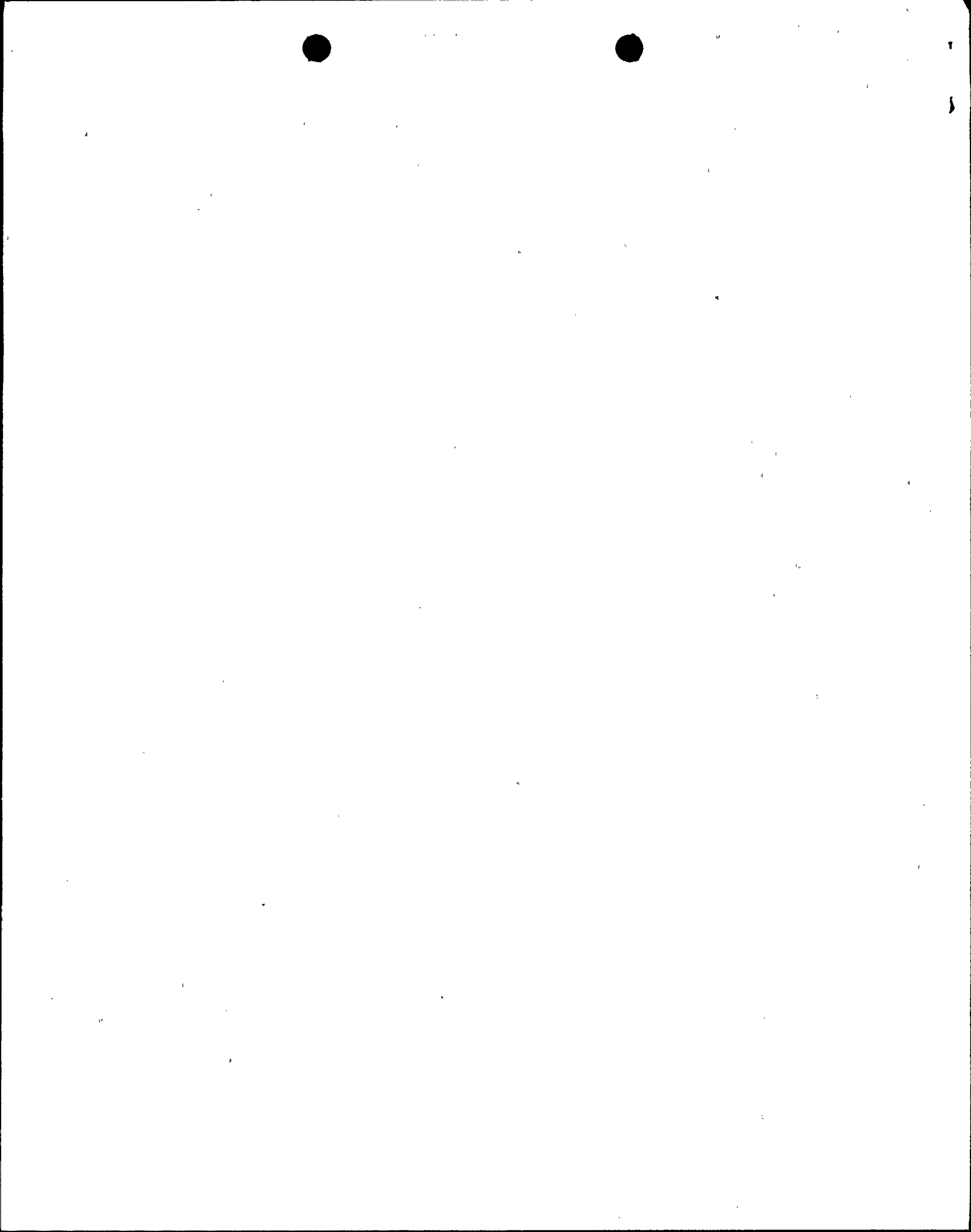
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NRC Bulletin 88-11
Pressurizer Surge Line Thermal Stratification

Gentlemen:

NRC Bulletin No. 88-11, "Pressurizer Surge Line Thermal Stratification", issued on December 20, 1988, requested that licensees establish and implement a program to confirm pressurizer surge line integrity in view of the occurrence of thermal stratification, and to inform the staff of the actions taken to resolve this issue.

By letter L-89-79 dated March 6, 1989, Florida Power and Light Company indicated that they were participating in a Westinghouse Owner's Group (WOG) program to address a partial resolution of this issue. The WOG program was discussed in that letter.

By letter L-89-194 dated May 31, 1989, Florida Power and Light Company provided an evaluation of the justification for continued operation of Turkey Point Units 3 and 4 for at least ten additional heatup-cooldown cycles. Florida Power and Light Company also committed to address the requirements of Bulletin 88-11 by January 1991. In response to this commitment, the enclosed attachment is provided.

Should there be any questions, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "T. F. Plunkett".

T. F. Plunkett
Vice President
Turkey Point Plant Nuclear

TFP/RJT/rjt
Attachment

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

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ATTACHMENT

NRC BULLETIN 88-11
PRESSURIZER SURGE LINE THERMAL STRATIFICATION

The following is provided in response to Bulletin 88-11:

- 1a. "Licensees are requested to conduct a visual inspection (ASME, Section XI, VT-3) of the pressurizer surge line at the first available cold shutdown after receipt of this bulletin which exceeds seven days".

Closed-out per letter L-89-194, dated May 31, 1989.

- 1b. "Within four months of receipt of this Bulletin, licensees of plants in operation over 10 years are requested to demonstrate that the pressurizer surge line meets the applicable design codes and other FSAR and regulatory commitments for the licensed life of the plant, considering the phenomenon of thermal stratification and thermal striping in the fatigue and stress evaluations".

Prior to the issuance of Bulletin 88-11, the Westinghouse Owners Group (WOG) had initiated a generic investigation of surge line thermal stratification in response to the INPO SER 25-87 notice. This WOG investigation was expanded to envelope the requirements of Bulletin 88-11.

Due to the short time frame available, individual analyses for each plant demonstrating acceptability for the licensed life of the plant was deemed not possible by the Westinghouse Owners Group. Therefore, in accordance with this action item and the NRC requested time frame, a bounding evaluation was performed to provide a justification for continued operation (JCO) allowing ten additional heatup-cooldown cycles. The justification for continued operation for Turkey Point Units 3 and 4 was transmitted to the NRC via letter L-89-194, dated May 31, 1989.

A detailed review of Turkey Point's operating history has been performed by Westinghouse. The review concluded that the (analytical) thermal cycles of both units were substantially less than the assumptions used in the generic evaluations. Westinghouse has performed a review of the bounding evaluation, specifically considering the Turkey Point operating history and concluded that the justification for continued operation (JCO) provided in letter L-89-194 is still applicable to Turkey Point

Units 3 and 4. In accordance with this action item, a plant specific justification for continued operation (L-89-194) and Westinghouse WCAP-12277 was provided to the NRC.

As stated in the SER for WCAP-12277, the NRC indicated the following position.

"Westinghouse on behalf of the Owners Group had made acceptable efforts to provide technical basis for the licensee's JCO as indicated in the requested actions of the NRC Bulletin 88-11, item 1.b. The staff believes that there is no immediate or short term safety concerns associated with the stratification effects for 10 fuel cycles of continued plant operation. However, each of the WOG plants should submit a JCO using this report as the basis."

Based on the NRC response, Florida Power and Light Company considers the requested actions of item 1.b of Bulletin 88-11 to be complete.

1.c. "If the analysis in 1.b does not show compliance with the requirements and licensing commitments stated therein for the duration of the operating license, the licensee is requested to obtain plant specific data on thermal stratification, thermal striping, and line deflections. The licensee may choose, for example, either to install instruments on the surge line to detect temperature distribution and thermal movements or to obtain data through collective efforts, such as from other plants with a similar surge line design".

As stated in WCAP-12277, the Turkey Point pressurizer surge lines are similar to other plants, and have been categorized as "Group 1" within the Westinghouse analyses. This effort to classify Turkey Point's pressurizer surge lines and the collective effort to obtain data satisfies the requested actions of item 1.c of Bulletin 88-11.

1.d. "Based on the applicable plant specific or referenced data, licensees are requested to update their stress and fatigue analyses to ensure compliance with applicable Code requirements, incorporating any observations from 1.a above. If a licensee is unable to show compliance with the applicable design codes and other FSAR and regulatory commitments, the licensee is requested to submit a justification for continued operation and a description of the proposed corrective actions for effecting long term resolution."



As discussed in the response to item 1.b, a detailed review of Turkey Point's operating history was performed. This evaluation concluded that since May 31, 1989, a maximum of four (4) heatup-cooldown cycles has occurred on a single unit, which was substantially less than the assumed ten (10) heatup-cooldown cycles used in the generic evaluation. Westinghouse has performed a review of the bounding evaluation, specifically considering Turkey Point's operating history and concluded the justification for continued operation (JCO) provided in letter L-89-194 is still applicable to Turkey Point Units 3 and 4. Based on the scheduled extended dual unit outage, Florida Power and Light Company anticipates that the justification for continued operation (JCO) provided in letter L-89-194 shall remain valid until the plant specific analyses is completed.

Turkey Point's plant specific analyses considering the recently obtained operating history, line geometry and support configuration will be completed by November 29, 1991.

Results of the plant specific analyses will be incorporated into the existing analysis documentation of record by December 31, 1991.

