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ACCESSION NBR: 9112310191 DOC. DATE: 91/12/23 NOTARIZED: YES DOCKET #
 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: Forwards individual plant exams of external events for
 severe accident vulnerabilities, as requested per Generic Ltr
 88-20, Suppl 4.

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FPL

P.O. Box 14000, Juno Beach, FL 33408-0420

DEC 23 1991

L-91-336
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 of
External Events for Severe Accident
Vulnerabilities, Generic Letter 88-20,
Supplement 4

Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities", requested that licensees submit a description of their proposed programs for completing an IPEEE.

Attached is the IPEEE program plan for St. Lucie Units 1 and 2 and Turkey Point Units 3 and 4, as requested in the generic letter.

This program plan identifies the methods and approach for performing the IPEEE, any methods not previously submitted for staff review, and the milestones and schedules for their completion. Pending receipt of your approval, 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,

W.H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/TCG/vmg

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

W. H. Bohlke being first duly sworn, deposes and says:

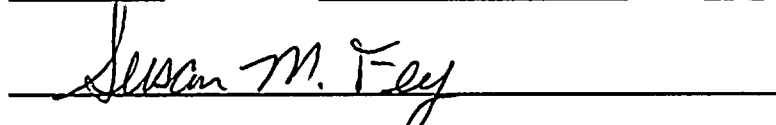
That he is Vice President, Nuclear Engineering and Licensing of Florida Power & Light Company, the Licensee herein;

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.



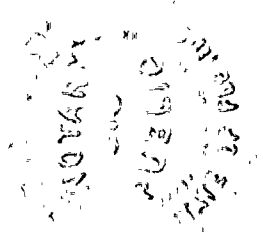
W. H. Bohlke

Subscribed and sworn to before me this
23rd day of December, 1991.



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

My Commission expires Notary Public, State of Florida
My Comm. Exp. Feb. 18, 1995
Bonded thru PICHARD Ins. Agency





ATTACHMENT 1

IPEEE PROGRAM PLAN

TURKEY POINT UNITS 3 AND 4

ST. LUCIE UNIT 1 AND 2

1. NRC REQUEST

Identify the method and approach selected for performing the IPEEE.

FPL RESPONSE

Seismic Events:

Florida Power and Light Company (FPL) used a proprietary site specific program to resolve the issues identified in Generic Letter 87-02, Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, for Turkey Point Units 3 and 4 and St. Lucie Unit 1. This program was developed following the completion of site specific uniform seismic hazard curves (submitted to the NRC by our letter L-91-185, dated July 19, 1991) which identified the low seismic risk associated with the FPL sites. FPL will use the results of this program to meet the requirements of the seismic portion of the IPEEE for Turkey Point Units 3 and 4 and St. Lucie Unit 1. FPL will conduct the same review for St. Lucie Unit 2 using the proprietary program developed to meet Generic Letter 87-02. FPL will incorporate peer review of its previous walkdowns and analysis to meet this requirement of the IPEEE.

Internal Fires:

FPL will utilize the EPRI FIRE VULNERABILITY EVALUATION (FIVE) methodology for the treatment of fire in the IPEEE for St. Lucie Units 1 and 2. The internal fire evaluation for Turkey Points Units 3 and 4 was included in the Turkey Point IPE submittal, FPL letter L-91-184, dated June 25, 1991.

High Winds, Floods, and Transportation and Nearby Facility Accidents:

FPL will utilize the progressive screening approach addressed in NUREG-1407 to identify potential vulnerabilities due to high winds, external floods, and transportation and nearby facility accidents for St. Lucie Unit 1 and 2.

The Turkey Point IPEEE will also utilize the screening approach described in NUREG-1407 to address potential vulnerabilities from tornadoes and transportation and nearby

facility accidents and will provide a review of the maximum precipitation assumptions utilized for the IPE submittal compared to the latest criteria published by the National Weather Service as requested in NUREG-1407. The hurricane and external floods analysis has been completed for Turkey Point Units 3 and 4. The results were included in the Turkey Point IPE submittal.

Lightning:

As requested in NUREG-1407, FPL will examine the operating experience (e.g., Licensee Event Reports) for St. Lucie Units 1 and 2 and for Turkey Point Units 3 and 4 to determine if lightning strikes are likely to cause more than just a loss of offsite power.

2. NRC REQUEST

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

FPL RESPONSE

With the exception of seismic, the evaluation methods to be utilized are consistent with those discussed in NUREG-1407 and NRC letter dated August 21, 1991 (Ashok C. Thadani to William H. Rasin) addressing the FIVE methodology as being acceptable for the evaluation of potential fire vulnerabilities.

FPL will use the proprietary site specific seismic evaluation program (FPL letter L-89-441 submitted 12/13/89) it developed to resolve Generic Letter 87-02, to resolve the recommendations of the IPEEE. FPL's site specific program does not encompass all of the recommendations found in the IPEEE because FPL's program is based on site specific risk data and cost/benefit analysis.

3. NRC REQUEST

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

FPL RESPONSE

FPL will perform the plant examinations for Turkey Point and St. Lucie utilizing in-house resources. In order to ensure adequate resources are available to support completion of the St. Lucie IPE (December, 1993), maintenance and application of the Turkey Point PRA, and performance of the IPEEE, FPL will provide the Turkey Point IPEEE submittal June, 1994, and the St. Lucie submittal December, 1994.

The milestones for performing these examinations and for submitting the results are indicated in Attachment 2.

ATTACHMENT 2

IPEEE PROGRAM PLAN

TURKEY POINT UNITS 3 AND 4

ST. LUCIE UNITS 1 AND 2

TURKEY POINT

MILESTONE

DATES(S)

Detailed planning

March, 1993 - May, 1993

Commence analysis

June, 1993

Final determination of
potential vulnerabilities

January, 1994

Complete, Turkey Point IPEEE

June, 1994

ST. LUCIE

MILESTONE

DATE(S)

Detailed planning

October, 1993 - December, 1993

Commence analysis

January, 1994

Final determination of
potential vulnerabilities

June, 1994

Complete, St. Lucie IPEEE

December, 1994