



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

April 13, 1992

Docket Nos. 50-250
and 50-251

Mr. J. H. Goldberg
President - Nuclear Division
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - INSTRUMENTATION TO FOLLOW THE COURSE OF
AN ACCIDENT (REGULATORY GUIDE 1.97)

Section 6.2 of Generic Letter 82-33 requested licensees to provide a report on their implementation of Regulatory Guide 1.97 (Revision 2), including methods for complying with the Commission's regulations and supporting technical justification for any proposed alternatives or deviations. A large number of exception requests were received from pressurized water reactor (PWR) licensees asking that the environmental qualification requirement for accumulator level and pressure monitoring instrumentation be relaxed from Category 2 to Category 3, which would allow commercial-grade instruments to be used. Prior to 1987, these requests were denied by the staff. Since then, these exception requests have been considered as open items until a generic resolution could be found.

The staff has now reviewed the bases for these exceptions and has concluded that no operator action is based on this post-accident instrumentation and that it does not perform a safety function. In addition, successful performance of core cooling systems can be inferred from other environmentally qualified instrumentation. Since this instrumentation does not perform any post-accident safety function, its qualification requirements can be reduced to Category 3. A copy of the Safety Evaluation is enclosed.

You have already installed Category 2 instrumentation to monitor accumulator level and pressure. You are no longer bound by this commitment, and may, at your discretion, replace this instrumentation with Category 3 instrumentation. Please notify me of the actions you plan to take and the schedule for implementation.

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Mr. J. H. Goldberg

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April 13, 1992

If you have any questions regarding this issue, please do not hesitate to contact me at (301) 504-2019.

Sincerely,

/s/

L. Raghavan, Acting Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

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Docket File: P122 NRC & Local PDRs
PDII-2 RDG S. Varga
G. Lainas H. Berkow
L. Raghavan D. Miller
OGC ACRS(10)
M. Sinkule, RII A. Hansen

OFFICE	LA:PDII-2	PM:PDII-2	D:PDII-2		
NAME	D. Miller	L. Raghavan	H. Berkow		
DATE	4/13/92	4/13/92	4/13/92	1/1	1/1

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Mr. J. H. Goldberg
Florida Power and Light Company

Turkey Point Plant

cc:
Harold F. Reis, Esquire
Newman and Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

Jack Shreve, Public Counsel
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Avenue, Room 812
Tallahassee, Florida 32399-1400

John T. Butler, Esquire
Steel, Hector and Davis
4000 Southeast Financial Center
Miami, Florida 33131-2398

Mr. Thomas F. Plunkett, Site
Vice President
Turkey Point Nuclear Plant
Florida Power and Light Company
P.O. Box 029100
Miami, Florida 33102

Joaquin Avino
County Manager of Metropolitan
Dade County
111 NW 1st Street, 29th Floor
Miami, Florida 33128

Senior Resident Inspector
Turkey Point Nuclear Generating
Station
U.S. Nuclear Regulatory Commission
P.O. Box 1448
Homestead, Florida 33090

Mr. Jacob Daniel Nash
Office of Radiation Control
Department of Health and
Rehabilitative Services
1317 Winewood Blvd.
Tallahassee, Florida 32399-0700

Mr. Robert G. Nave, Director
Emergency Management
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100

Administrator
Department of Environmental
Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

Regional Administrator,
Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W. Suite 2900
Atlanta, Georgia 30323

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Plant Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
P.O. Box 029100
Miami, Florida 33102

Mr. R. E. Grazio
Director, Nuclear Licensing
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420