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AUTH. NAME AUTHOR AFFILIATION
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Documents util response to concerns re SG mechanical tube
 plugs fabricated from thermally treated Alloy 600.

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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
Alloy 600 Steam Generator Mechanical Tube Plugs

The purpose of this letter is to document Florida Power and Light's (FPL) response to concerns regarding steam generator mechanical tube plugs fabricated from thermally treated (TT) Alloy 600.

On December 22, 1994, the NRC held a meeting with the Westinghouse Owners Group (WOG) and industry representatives to discuss recent operating experience affecting the predicted service life of steam generator mechanical tube plugs fabricated from TT Alloy 600 and supplied by Westinghouse. The NRC has concluded that the issue does not represent an immediate safety concern, but has informally requested that the industry take a proactive approach to resolving this issue. In response to this request, the WOG Issues Review Group has identified several items to be addressed by each utility. Attached is FPL's response to the items identified by the WOG, for Turkey Point Units 3 and 4.

Should there be any questions, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Plant

TFP/OIH

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

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PDR ADDCK 05000250
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an FPL Group company

ADD: Steve Dambek 014E21

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TURKEY POINT UNITS 3 AND 4

ALLOY 600 THERMALLY TREATED STEAM GENERATOR MECHANICAL TUBE PLUGS

BACKGROUND

On December 22, 1994, the NRC held a meeting with the Westinghouse Owners Group (WOG) and industry representatives to discuss recent operating experience affecting the predicted service life of steam generator mechanical tube plugs fabricated from thermally treated (TT) Alloy 600 and supplied by Westinghouse. The NRC has informally requested that the industry take a proactive approach to resolving this issue. By letter OG-94-107, from Thomas V. Greene, WOG Vice Chairman, to Westinghouse Owners Group Primary Representatives, dated December 30, 1994, the WOG Issues Review Group identified several items to be addressed by each utility in response to NRC's request. The following is FPL's response to the items identified by the WOG for Turkey Point Units 3 and 4.

ITEM 1

Identify the number of Westinghouse mechanical plugs manufactured from Alloy 600 TT material present in your steam generators that have not been either changed out or repaired.

FPL RESPONSE

The following table summarizes the number of Westinghouse mechanical plugs manufactured from Alloy 600 TT currently installed in the Turkey Point Units 3 and 4 steam generators.

STEAM GENERATOR	HOT LEG	COLD LEG
3A	11	11
3B	5	9
3C	17	20
4A	14	15
4B	7	6
4C	1	1

ITEM 2

Reaffirm that operation of your plant with the identified plugs does not represent a safety issue.

FPL RESPONSE

The basis for the Justification For Continued Operation (JCO) with TT Alloy 600 steam generator mechanical plugs is documented in WCAP-12244, "Steam Generator Tube Plug Integrity Summary Report," dated April 1989, and subsequent revisions. The JCO is based on the following factors:

- a) Low probability of a Plug Top Release (PTR) event
- b) The population of tubes which may perforate as a result of plug top release is limited
- c) Should perforation occur following PTR, the primary to secondary leakage consequences are limited
- d) There is a very low likelihood that multiple plugs could be in a condition that would be capable of resulting in PTR
- e) The plant Emergency Response Guidelines are adequate to bring the plant to safe shutdown following PTR

All of the above factors are still applicable to Turkey Point Units 3 and 4, therefore, the JCO is still valid. Additionally, since all of the subject tube plugs are pre-operational installations for manufacturing degraded tubes, they are not expected to result in primary to secondary leakage should plug cracking occur.

ITEM 3

A commitment to evaluate and assess the impact of the Addendum 3 to WCAP-12244, to be issued by Westinghouse by January 31, 1995, on your existing action plan for addressing mechanical plug corrosion provided to the NRC in response to NRC Bulletin 89-01 and its supplements.

FPL RESPONSE

FPL has performed remote tube sheet visual inspections of all installed steam generator tube plugs, regardless of manufacture, at each refueling outage subsequent to the issuance of NRC Bulletin 89-01. These inspections have resulted in the removal and replacement of 1 suspect hot leg Westinghouse mechanical tube plug. The suspect plug was provided to Westinghouse for evaluation. The cause of leakage was determined to be inadequate installation. In addition, steam generator tube inspections for Turkey Point Units 3 and 4, performed during the 1994 refueling outages, did not identify any degraded tube plugs. The impact of Addendum 3 has already been assessed for applicability at the Turkey Point Units 3 and 4 steam generators. All subject hot leg plugs are scheduled to be removed and replaced during the next scheduled refueling outages which are currently scheduled for September 1995 for Unit 3, and March 1996 for Unit 4. Preliminary

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lifetimes for cold leg plugs, to be published in the next revision to WCAP-12244, would require repair/replacement of the subject cold leg plugs in approximately the year 2000. Cold leg tube plugs installed in the Turkey Point steam generators will be repaired/replaced during the scheduled refueling outages prior to the recommended lifetimes.

ITEM 4

A commitment to issue to the NRC a schedule and revised action plan for your plant in addressing this issue 30 days prior to your next scheduled outage.

FPL RESPONSE

FPL plans to remove and replace the subject hot leg tube plugs during the next refueling outages for Turkey Point Units 3 and 4 which currently scheduled for September 1995 for Unit 3, and March 1996 for Unit 4. Cold leg tube plugs will be repaired/replaced in accordance with the recommended dates to be published in the next revision to WCAP-12244. FPL will notify the NRC of any changes to this schedule.

