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 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.      05000335

AUTH. NAME      AUTHOR AFFILIATION  
 BOHLKE, W.H.      Florida Power & Light Co.  
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SUBJECT: Submits verification of seismic adequacy of mechanical & electrical equipment in operating reactors.

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 TITLE: Seismic Qualification of Equipment in Operating Plants - A-46 - GL-87

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JUN 13 1995  
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U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Re: St. Lucie Unit 1 Docket No. 50-335  
Turkey Point Units 3 and 4 Docket Nos. 50-250 and 50-251  
Verification of Seismic Adequacy of Mechanical and  
Electrical Equipment in Operating Reactors  
Unresolved Safety Issue (USI) A-46 Generic Letter (GL) 87-02

By letters dated July 6, 1994 and February 9, 1995 and in recent telephone conversations between NRC and FPL, the NRC has stated its intention of conducting "on site team inspections" of Turkey Point in order to complete the review and closure of GL 87-02 issues at the FPL nuclear stations. FPL has carefully considered this method of concluding staff reviews and closing out these issues. We believe that the alternative proposed below will result in lower cost, as well as a more timely closure of the issues.

The estimated cost of team inspections at Turkey Point, including NRC inspection hours, NRC contractor fees, FPL contractor fees, and technical support is over \$250,000. In addition, this method for addressing GL 87-02 issues would not achieve task closure until well into 1996. FPL believes that, in light of the extremely low seismicity of FPL nuclear sites, this level of financial and human resources far exceeds any potential benefit that might come from using a team inspection as the review and closure tool on this generic issue.

We believe that a two day technical working meeting in Washington between NRC staff and FPL walk-down team members, including Drs. Robert Kennedy, John Reed, and John Stevenson, is sufficient to achieve satisfactory resolution of the areas of staff concern listed in Section 3.0 of the February 9, 1995 letter. Following this meeting, FPL proposes that the Turkey Point site resident inspector conduct an inspection to verify completion of FPL commitments and program implementation. The results of the technical meeting and site inspection would provide appropriate resolution and closure of these issues for FPL nuclear plants. The NRC staff would then be able to issue the final GL 87-02 Safety Evaluation Reports. It is estimated that this method of achieving closure on this generic issue will save approximately \$200,000 in financial and human resources. Further, this alternative method for handling GL 87-02 would better assure task completion in 1995.

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In light of the extremely low seismic risk at FPL nuclear sites, we ask NRC management to review this request for reducing the Regulatory Burden on this issue. We would welcome a meeting with NRC management to further discuss this request.

Very truly yours,



W. H. Bohlke  
Vice President  
Nuclear Engineering and Licensing

WHB/smm

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant  
Senior Resident Inspector, USNRC, St. Lucie Plant  
T.F. Plunkett, Turkey Point Site Vice President  
D.A. Sager, St. Lucie Site Vice President

