

Mr. Thomas F. Plunkett
President - Nuclear Division
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

April 15, 1999

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING
GENERIC LETTER 96-05 PROGRAM - TURKEY POINT
PLANT, UNITS 3 AND 4 (TAC NOS. M97112 AND M97113)

Dear Mr. Plunkett:

On September 18, 1996, the U. S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves," to request that nuclear power plant licensees establish a program, or ensure the effectiveness of the current program, to verify on a periodic basis that safety-related motor-operated valves continue to be capable of performing their safety functions within the current licensing basis of the facility.

By letters dated November 6, 1996, and March 11, 1997, Florida Power and Light Company described its response to the recommendations of GL 96-05 for Turkey Point Nuclear Plant, Units 3 and 4. During an NRC inspection at St. Lucie Nuclear Plant on January 11 to 13, 1999, the NRC staff also evaluated the GL 96-05 program being implemented at Turkey Point through review of Turkey Point documentation and discussions with Turkey Point personnel. In NRC Inspection Report (IR) 50-250 and 251/98-13, the staff documented its evaluation of Turkey Point GL 96-05 program and identified specific areas of the program which required further assessment before the NRC staff can complete its review.

The enclosed request for additional information (RAI), regarding the remaining areas for review of GL 96-05 program at Turkey Point, has been discussed with Craig Mowrey of your staff. A target date for your response has been agreed upon to be 60 days from your receipt of this RAI. Should a situation occur that prevents you from meeting the target date, please contact me at (301) 415-1496.

Sincerely,

Original signed by:

Kahtan N. Jabbour, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: As stated

cc w/encl: See next page

DISTRIBUTION:

Docket File

PUBLIC

Turkey R/F

JZwolinski/SBlack

HBerkow

SPeterson

BClayton

KJabbour

OGC

ACRS

LWert, RII

210052

NRC FILE CENTER COPY

11
DFot

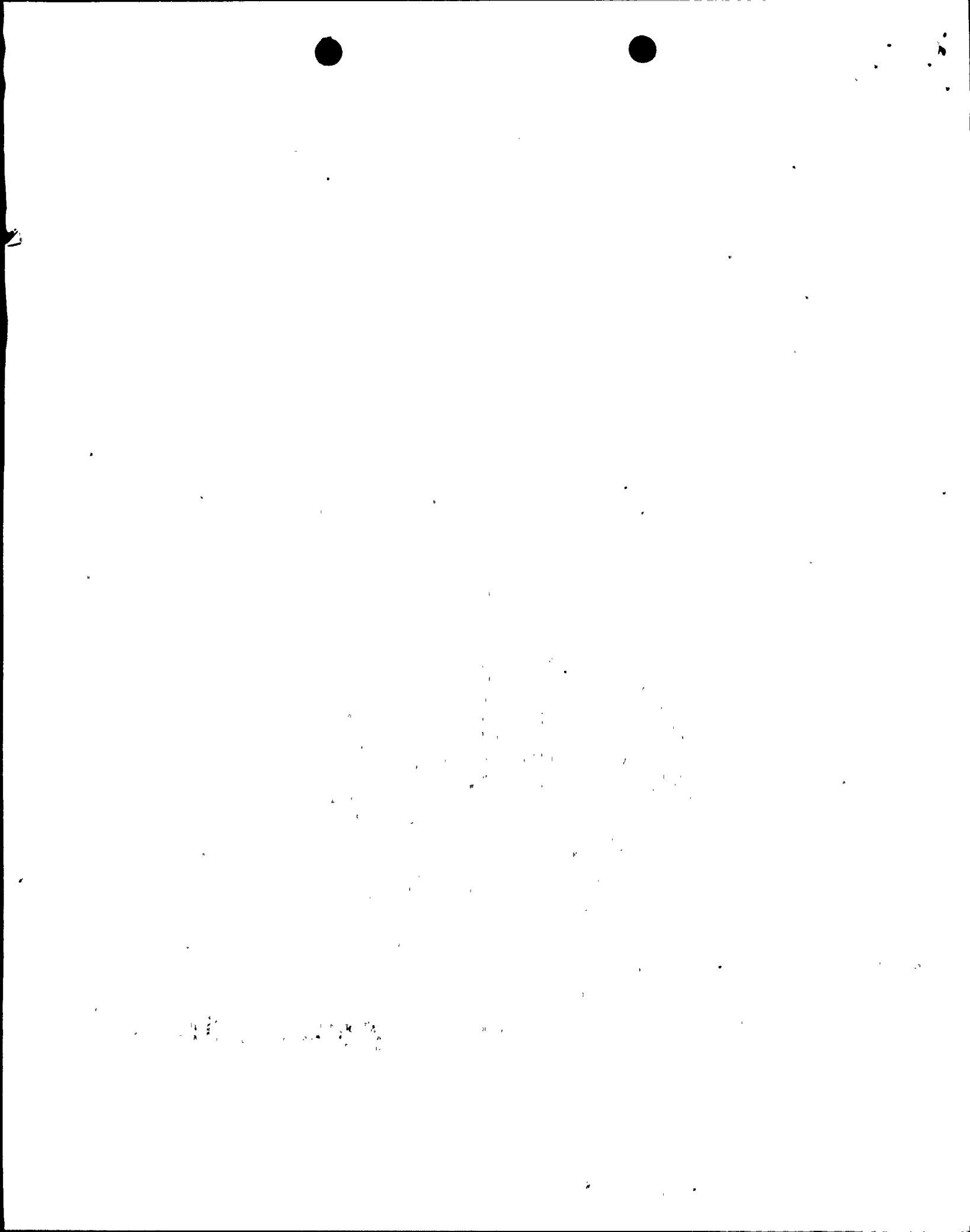
DOCUMENT NAME: G:\TURKEY\RAI97112.WPD

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	PDII-2/PM	E	PDII-2/LA	SPeterson	PDII-2/SC				
NAME	KJabbour	<i>KJ</i>	BClayton	<i>BC</i>	SPeterson	<i>SP</i>			
DATE	04/15/99		04/15/99		04/15/99		04/ /99		04/ /99

9904210283 990415
PDR ADOCK 05000250
P PDR

AL RECORD COPY





UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 15, 1999

Mr. Thomas F. Plunkett
President - Nuclear Division
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING
GENERIC LETTER 96-05 PROGRAM - TURKEY POINT
PLANT, UNITS 3 AND 4 (TAC NOS. M97112 AND M97113)

Dear Mr. Plunkett:

On September 18, 1996, the U. S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves," to request that nuclear power plant licensees establish a program, or ensure the effectiveness of the current program, to verify on a periodic basis that safety-related motor-operated valves continue to be capable of performing their safety functions within the current licensing basis of the facility.

By letters dated November 6, 1996, and March 11, 1997, Florida Power and Light Company described its response to the recommendations of GL 96-05 for Turkey Point Nuclear Plant, Units 3 and 4. During an NRC inspection at St. Lucie Nuclear Plant on January 11 to 13, 1999, the NRC staff also evaluated the GL 96-05 program being implemented at Turkey Point through review of Turkey Point documentation and discussions with Turkey Point personnel. In NRC Inspection Report (IR) 50-250 and 251/98-13, the staff documented its evaluation of Turkey Point GL 96-05 program and identified specific areas of the program which required further assessment before the NRC staff can complete its review.

The enclosed request for additional information (RAI), regarding the remaining areas for review of GL 96-05 program at Turkey Point, has been discussed with Craig Mowrey of your staff. A target date for your response has been agreed upon to be 60 days from your receipt of this RAI. Should a situation occur that prevents you from meeting the target date, please contact me at (301) 415-1496.

Sincerely,

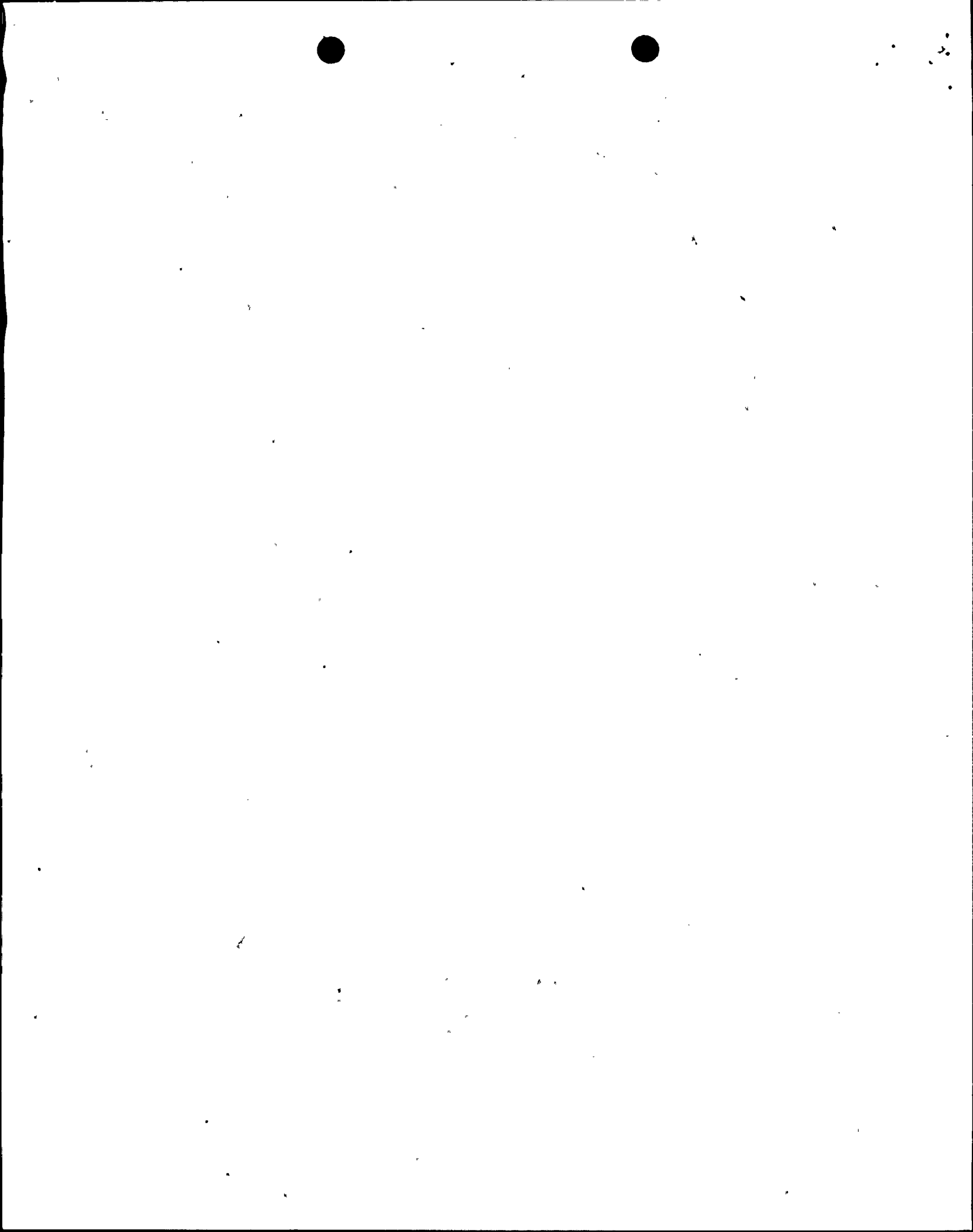
Kahtan N. Jabbour

Kahtan N. Jabbour, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: As stated

cc w/encl: See next page

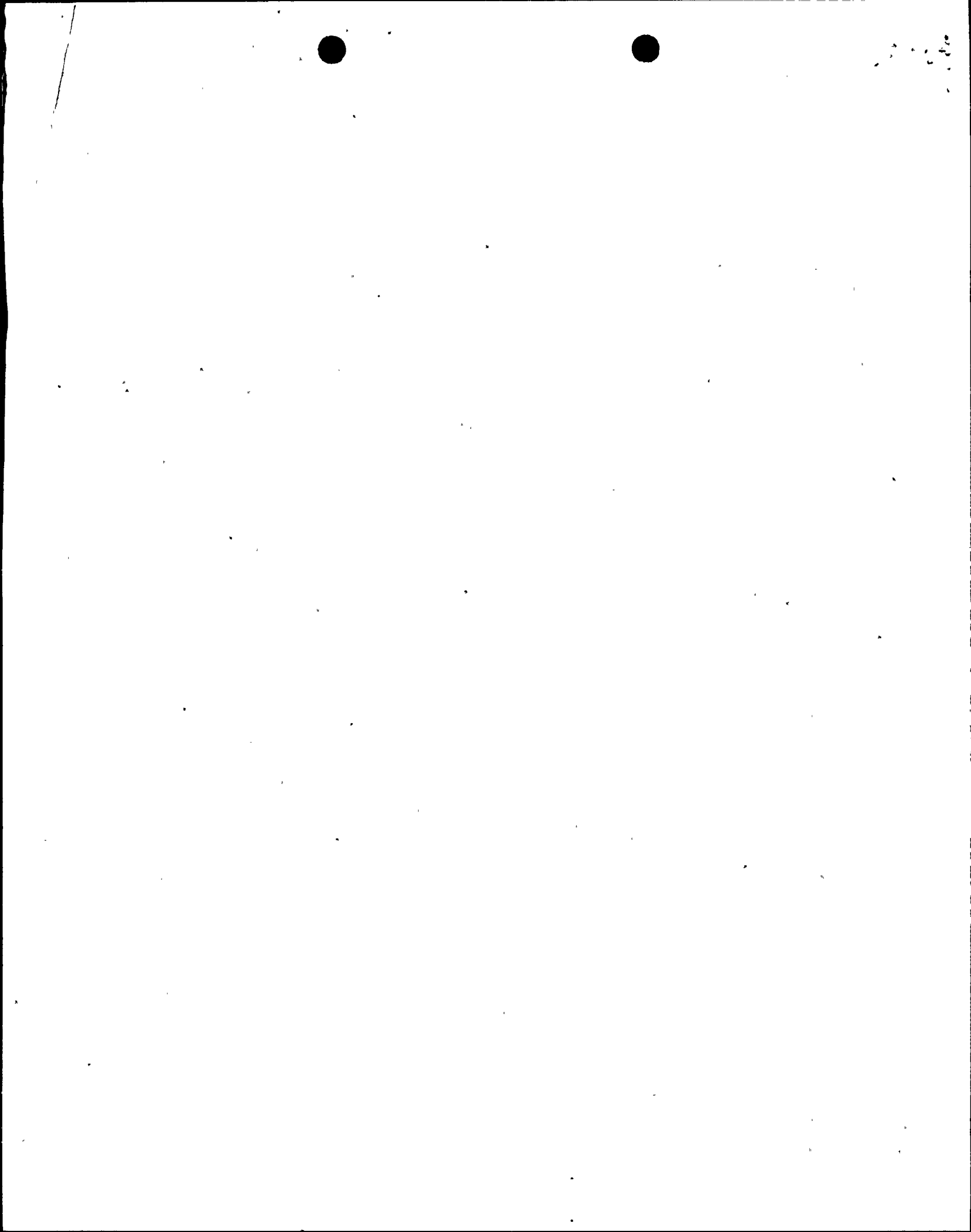


REQUEST FOR ADDITIONAL INFORMATION
GENERIC LETTER 96-05
TURKEY POINT PLANT, UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251

1. In U. S. Nuclear Regulatory Commission (NRC) Inspection Report (IR) Nos. 50-250 and 251/98-13, the NRC staff discussed its evaluation of the motor-operated valve (MOV) program being established at Turkey Point Plant, Units 3 and 4, in response to Generic Letter (GL) 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves." In IR 98-13, the NRC staff identified three areas of the licensee's MOV program which required further assessment before the NRC staff can complete its review. With respect to one area, the licensee had not committed to implement the generic industry program developed by the Joint Owners' Group (JOG) in response to GL 96-05 and, therefore, could not rely on the JOG program to establish applicable degradation rates for the potential increase in valve thrust or torque operating requirements for the GL 96-05 MOVs at Turkey Point. The NRC staff found that the licensee had not correlated in-plant valve tests with the individual MOV groups at Turkey Point to ensure that representative dynamic test data were obtained for each MOV in the Turkey Point GL 96-05 program in order to establish applicable degradation rates for its GL 96-05 MOVs. Further, the licensee had not presented the available margins as part of the GL 96-05 program to justify that each MOV would continue to be capable of performing its safety functions despite potential degradation during performance of the dynamic testing program at Turkey Point. Therefore, the NRC staff was not able to determine whether the licensee's planned testing would be sufficient to identify valve age-related degradation for each GL 96-05 MOV or whether the capability margins of each MOV would be sufficient during the period while testing was being performed to establish degradation rates. The licensee should provide (a) the MOV capability margins, (b) representative MOVs to be tested for each valve group in the GL 96-05 program at Turkey Point, and (c) the dynamic testing schedule to establish applicable degradation rates for the potential increase in valve thrust or torque operating requirements, for each GL 96-05 MOV at Turkey Point.
2. With respect to the second area of the licensee's GL 96-05 program noted in IR 98-13 as requiring further review, the NRC staff found that the licensee's guidance for MOV trending and monitoring did not provide details of the monitoring of MOV parameters to verify specific aspects of MOV performance, including MOV motor actuator output and degradation trends. The licensee should describe its process for monitoring and evaluating MOV parameters to identify degradation trends.
3. With respect to the third area of the licensee's GL 96-05 program noted in IR 98-13 as requiring further review, the licensee stated that it planned to update its MOV risk ranking methodology during spring 1999 to reflect an accepted generic industry methodology. The NRC notes that the licensee may elect to apply insights from the guidance provided in the Westinghouse Owners Group (WOG) Engineering Report V-EC-1658-A (Revision 2, dated August 13, 1998), "Risk Ranking Approach for Motor-Operated Valves in Response to Generic Letter 96-05," and the NRC safety evaluation dated April 14, 1998, on the WOG methodology for risk ranking MOVs at

ENCLOSURE

Westinghouse-designed pressurized-water reactor nuclear plants (such as Turkey Point). The licensee should describe the updated methodology used for risk ranking MOVs at Turkey Point, including application of an expert panel in evaluating the safety significance of its GL 96-05 MOVs, and comparison of the high-risk MOVs at Turkey Point to those at other Westinghouse-designed PWR nuclear plants.



Mr. T. F. Plunkett
Florida Power and Light Company

TURKEY POINT PLANT

cc:

M. S. Ross, Attorney
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

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

Mr. Robert J. Hovey, Site
Vice President
Turkey Point Nuclear Plant
Florida Power and Light Company
9760 SW. 344th Street
Florida City, FL 33035

Plant Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
9760 SW. 344th Street
Florida City, FL 33035

County Manager
Miami-Dade County
111 NW 1 Street, 29th Floor
Miami, Florida 33128

Mr. Steve Franzone
Licensing Manager
Turkey Point Nuclear Plant
9760 SW. 344th Street
Florida City, FL 33035

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

Mr. John Gianfrancesco
Manager, Administrative Support
and Special Projects
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. William A. Passetti, Chief
Department of Health
Bureau of Radiation Control
2020 Capital Circle, SE, Bin #C21
Tallahassee, Florida 32399-1741

Mr. Rajiv S. Kundalkar
Vice President - Nuclear Engineering
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. Joe Myers, Director
Division of Emergency Preparedness
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100

