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SUBJECT: LTR 3 ENCL 0
RESPONSE TO NRC'S 12/09/77 REQUEST FOR COMPLETION OF QUESTIONNAIRES CONCERNING
STEAM GENERATORS AND STANDBY DIESEL GENERATORS.

PLANT NAME: TURKEY POINT - UNIT 3
TURKEY POINT - UNIT 4
ST. LUCIE - UNIT 1
ST. LUCIE - UNIT 2

REVIEWER INITIAL: XJM
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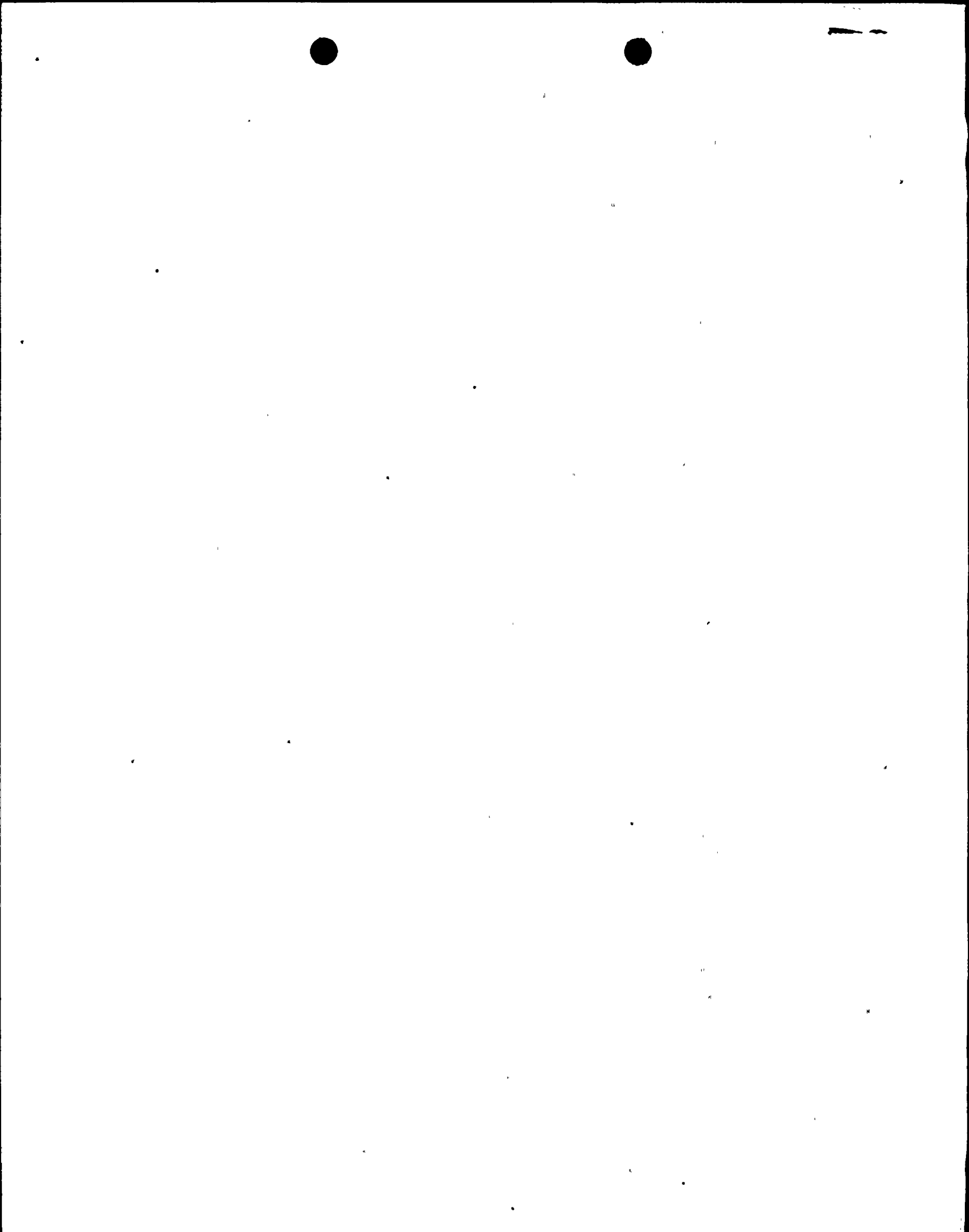
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January 20, 1978
L-78-25

Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Case:

Re: Turkey Point Units 3 and 4 and St. Lucie Unit 1
License Nos. DPR-31, DPR-41, and DPR-67
Steam Generator and Standby Diesel Generator
Questionnaires

We have received letters from your staff dated December 9, 1977 and December 15, 1977 requesting that Florida Power & Light Company (FPL) complete questionnaires concerning steam generators and standby diesel generators, respectively. We have reviewed these questionnaires and determined that their completion would be a significant undertaking for FPL personnel who are essential to the completion of activities required for the operation of our nuclear units.

For example, the staff at St. Lucie Unit 1 is preparing for the first refueling outage at that plant which is scheduled to begin in March, 1978. It will be a lengthy outage and will require extensive preparation. Because personnel involved in this outage preparation will be the same as those who would respond to the questionnaires at St. Lucie, little time will be available for writing the responses.

Also, the Turkey Point Unit 4 steam generator inspections are due in February, 1978. This will require the Turkey Point Staff to prepare for and conduct the inspections. In addition, they are preparing for the Unit 4 refueling outage, scheduled for Spring, 1978. Hence, the Turkey Point Plant Staff, too will have little time for preparation of the questionnaire responses.

Most of the information requested by the steam generator questionnaire has already been provided for the Turkey Point Plant in reports filed with your staff concerning secondary water chemistry and the condition of the steam generator tubes. We have also provided a great deal of information on this subject to EPRI which should be available to your staff.

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Mr. Edson G. Case
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The first steam generator tube surveillance at St. Lucie Unit 1 is scheduled for the first refueling outage. Until several months after that outage, data will not be available. However, the NRC may obtain any basic plant and steam generator design information from the NSSS vendor. If there is information for either Turkey Point or St. Lucie which cannot be obtained through the channels we have suggested, please let us know.

We have estimated that the standby diesel generator questionnaire would require a minimum of 200 man-hours per unit for travel time, inspections, record review, data compilation, and preparation and review of the completed questionnaire. We are unable to justify the expenditure of this time by personnel whose activities are required for plant operation.

In conclusion, we have determined that optimal utilization of our operating personnel prevents us from responding to the two subject surveys.

~~Yours very truly,~~

Robert E. Uhrig
Robert E. Uhrig
Vice President

REU/NLR/bb

