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U.S. NUCLEAR REGULATORY COMMISSION

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TO: Mr. Victor Stello

FROM: Florida Power & Light Co.  
Miami, FL 33101  
Robert E. Uhrig

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DESCRIPTION

Ref: August 5, 1977 letter from Florida Power & Light Co. requesting an amendment to the Unit 3 operating license 3 DPR-31 which would allow operation until the next scheduled re-fueling outage prior to performing an inspection of the steam generators (L-77-246) which will be based on the program described in applicant's letter of June 16, 1977 (1-77-179).  
Notarized on 8/8/10/77.

PLANT NAME:  
Turkey Point Unit 3  
VT 8/13/77

ENCLOSURE

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**ACKNOWLEDGED**

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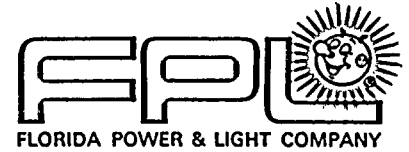
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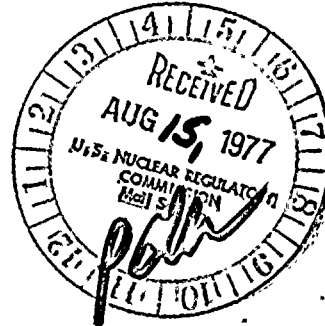
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August 10, 1977  
L-77-250

Director of Nuclear Reactor Regulation  
 Attention: Mr. Victor Stello, Director  
 Division of Operating Reactors  
 U. S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Dear Mr. Stello:

Re: Turkey Point Unit No. 3  
 Docket No. 50-250  
 Proposed Amendment to  
Operating License DPR-31



On August 5, 1977 Florida Power & Light Company requested an amendment to the Unit 3 operating license which would allow operation until the next scheduled refueling outage prior to performing an inspection of the steam generators (L-77-246). The results of the steam generator inspections performed recently on other units indicate that certain operating restrictions are appropriate for Unit 3. Florida Power & Light Company therefore requests the following license modification as a supplement to our request of August 5, 1977:

#### Steam Generator Operation

1. Primary to secondary leakage through the steam generator tubes shall be limited to 0.3 gpm per steam generator. With any steam generator tube leakage greater than this limit, the reactor shall be brought to the cold shutdown condition within 24 hours. The leaking tube(s) shall be evaluated and plugged prior to resuming power operation.
2. The concentration of radioiodine in the primary coolant shall be limited to 1 microcurie/gram during normal operation and to 30 microcuries/gram during power transients.

An operating restriction on the frequency of the incidence of leaking tubes was also evaluated. It was determined that such a restriction would not be appropriate for the following reasons:

- 1) The safety evaluation performed for the return to operation of Unit 4 did not rely on this restriction in coming to the conclusion that return to operation did not involve a safety concern.



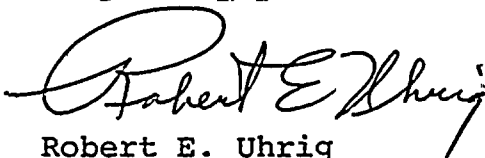
Mr. Victor Stello  
L-77-250  
Page 2

- 2) Present reporting procedures provide the NRC ample opportunity to review steam generator tube plugging trends.
- 3) The two tube leaks within twenty days criterion is an inappropriate method of detecting trends of the incidence of leaking steam generator tubes and has proven to be excessively restrictive to the operation of other units without any benefit to the public.
- 4) Two tube leaks within twenty days out of approximately ten thousand tubes is not indicative of excessive deterioration. The random incidence of tube leakage is expected to occur occasionally at this rate or higher due to the statistical variation in the incidence of the event. In short, the two tube leaks within twenty day limit is in our opinion without any sound justifiable technical basis.

The inspection program which will be performed on the steam generators during the next refueling will be based on the program described in our letter of June 16, 1977 (L-77-179). The results of this inspection program will be used to develop a preventative plugging program.

The Turkey Point Plant Nuclear Safety Committee and the Company Nuclear Review Board have reviewed this license amendment request and have concluded that it does not involve an unreviewed safety question.

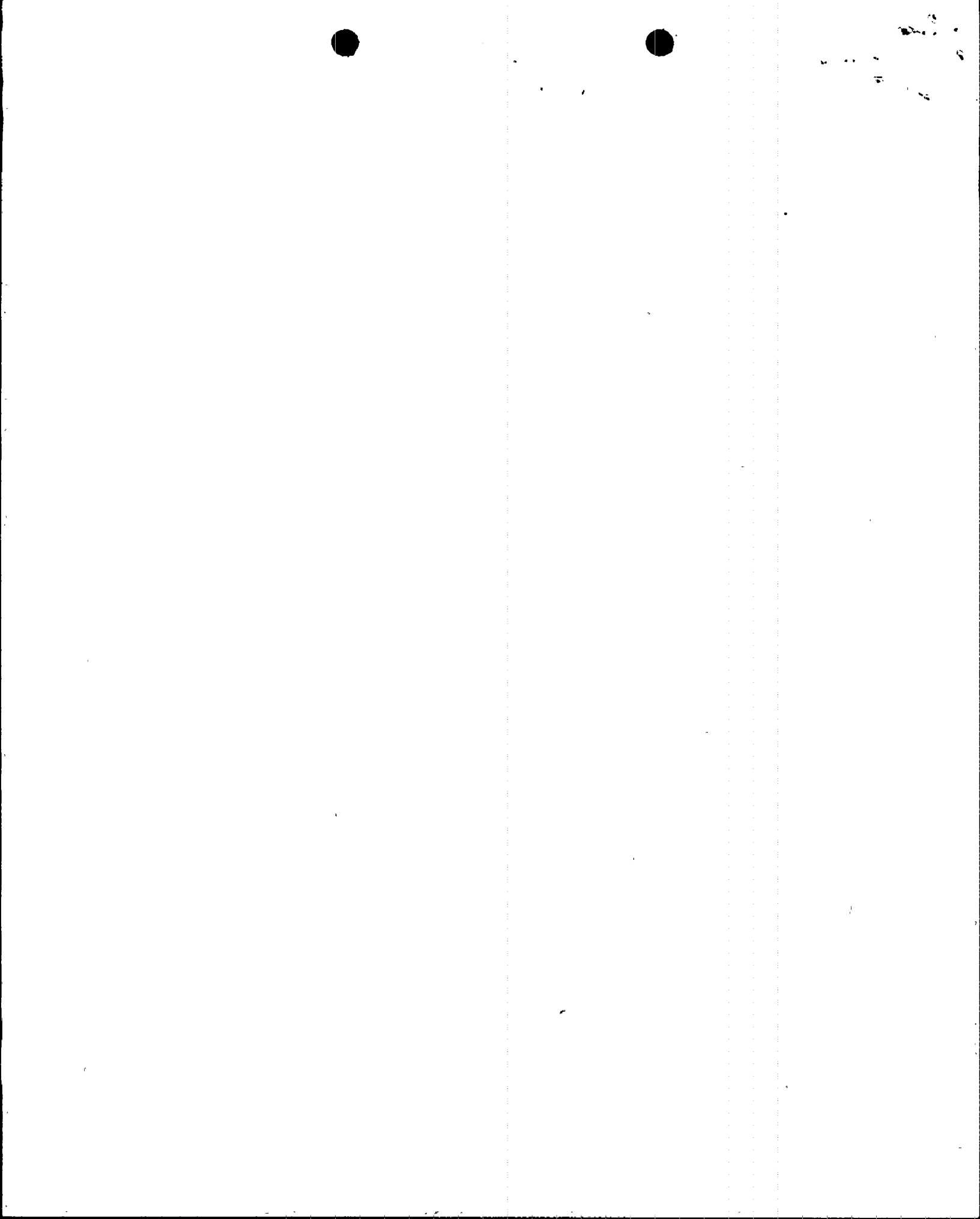
Very truly yours,



Robert E. Uhrig  
Vice President

REU:GDW:ltm

cc: Norman C. Mosely, Region II  
Robert Lowenstein, Esquire




STATE OF FLORIDA    )  
                          )  
COUNTY OF DADE    )        ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

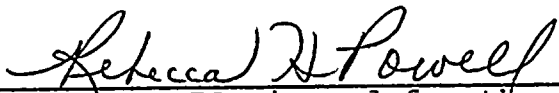
That he is a Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this said document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

  
\_\_\_\_\_  
Robert E. Uhrig

Subscribed and sworn to before me this

10<sup>th</sup> day of August, 1977

  
\_\_\_\_\_  
NOTARY PUBLIC, in and for the County of Dade,  
State of Florida

My commission expires: NOTARY PUBLIC STATE OF FLORIDA at LARGE  
MY COMMISSION EXPIRES APRIL 2, 1980  
THIRD CLASSIFICATION BONDING AGENCY





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