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PLANT NAME: Turkey Pt. Units 3 & 4

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Regulatory Docket File

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FPL

FLORIDA POWER & LIGHT COMPANY

August 21, 1975
L-75-399

Mr. George Lear, Chief
Operating Reactors Branch No. 3
Division of Reactor Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Lear:

Re: Proposed Snubber Tech Specs for Turkey Point Plant - Docket Nos. 50-250 & 50-251

Florida Power & Light Company has reviewed the Nuclear Regulatory Commission's model Technical Specifications concerning the operability and surveillance of hydraulic shock suppressors (snubbers). We wish to thank you for the opportunity of commenting on this.

We would like to present changes which we feel would improve this Technical Specification. The suggested changes are as follows:

1. Section 3.6.I.3 states:

   "From and after the time that a hydraulic snubber is determined to be inoperable, continued reactor operations is permissible only during the succeeding 72 hours unless the snubber is sooner made operable."

   For the case of only one inoperable snubber, we suggest that the Plant Nuclear Safety Committee be given 72 hours to determine whether safe reactor operation can or cannot continue. Reactor shutdown should be required only if safe operation cannot be assured.

2. Section 4.6.I.1 states in part:

   "The required inspection interval shall not be lengthened more than one step at a time."

   We suggest that the return to longer inspection intervals be dependent on the cause of snubber inoperability. For example, if the cause was improper installation, the interval between inspections should be increased more quickly than if the cause was some time dependent function directly related to the snubber and/or its environment.

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3. Section 4.6.I.2 states:

> "All hydraulic snubbers whose seal materials have not been demonstrated to be compatible with the operating environment shall be visually inspected for operability every 31 days."

We suggest that the inspection interval for such snubbers not be restricted to 31 days but that it may be lengthened according to the schedule in Section 4.6.I.1.

4. Section 4.6.I.4 states in part:

> "For each unit and subsequent unit found inoperable, an additional 10% or 10 snubbers shall be so tested until no more failures are found or all units have been tested."

We suggest this sentence be revised to read:

> "For each unit and subsequent unit found inoperable, an additional 10% or 10 snubbers, <u>whichever is less</u>, shall be so tested until no <u>more failures are</u> found or all units have been tested."

5. Table 3.6.I lists non-safety related snubbers which are exempt from the snubber specifications. We suggest that such a list be eliminated, otherwise, a formal technical specification change will be needed whenever a non-safety related snubber is added or removed from the list.

Yours very truly,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU:JAD;nch

cc: Jack R. Newman, Esq.

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