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(TEMPORARY FORM)

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FROM: Florida Power & Light Co. Miami, Fla Robert E. Uhrig		DATE OF DOC 9-12-75	DATE REC'D 9-17-75	LTR xxxx	TWX	RPT	OTHER
TO: Mr. Karl R. Goller		ORIG 1-signed	CC	OTHER	SENT NRC PDR _____ SENT LOCAL PDR _____		
CLASS	UNCLASS xxxx	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-250 and <b>251</b>		

DESCRIPTION:  
  
Ltr re our 8-7-75 ltr ..... the Turkey Point Tech- Specs agree with Appendix J except for minor terminology differences .....

ENCLOSURES:  
  
**ACKNOWLEDGED  
DO NOT REMOVE**

PLANT NAME: Turkey Point #3 and 4

**FOR ACTION/INFORMATION**

9-22-75 JGB

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to L.A.

*MD-4*

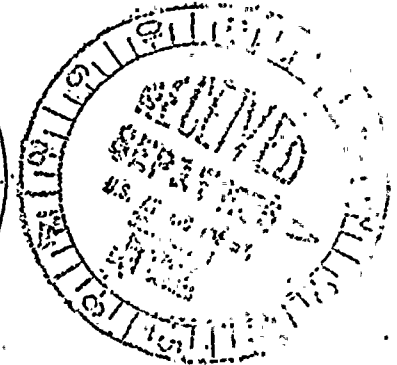
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Regulatory

File Gy.



FLORIDA POWER &amp; LIGHT COMPANY

September 12, 1975  
L-75-437

Mr. Karl R. Goller, Assistant Director  
for Operating Reactors  
Division of Reactor Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Goller:

Re: Turkey Point Units 3 and 4 (Dockets 50-250 and 50-251)  
Compliance with 10 CFR 50, Appendix J

Your letter of August 7, 1975, requested that we determine our degree of compliance with 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors". With the following exceptions, we are in compliance with Appendix J.

- (1) Appendix J, Section III.D.2, requires that airlocks be pressure tested at either six-month intervals or after each opening. Turkey Point Technical Specification 4.4.2.2 requires pressure testing of the personnel and emergency airlocks either annually if not used or every four months if used periodically. We are complying with the Technical Specification. Our position concerning the frequency of airlock leak testing was previously expressed in our October 8, 1973 letter to the Directorate of Licensing and is further described below. In accordance with 10 CFR 50.12, we hereby request exemption from the requirements of Appendix J with respect to testing frequency and method of testing, for the reasons outlined below.

Personnel and emergency airlocks are leak tested in accordance with Turkey Point Operating Procedure 13514.1. Leak tightness of the inner door is tested by pressurizing the annulus between the two "O"-rings. The outer door "O"-rings are then tested by pressurizing the entire airlock. However, since the inner door opens into containment, both tests tend to unseat the inner door. Therefore, if the inner door "O"-rings are to be meaningfully tested, the door must be held shut by a clamping arrangement which takes a minimum of about 12 man-hours.

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to install. A similar arrangement is not required on the outer door because that door opens into the airlock and the test differential pressure is in the direction which seats the door. Thus, a simple positive-pressure test of the personnel and emergency airlocks is not possible because of the design and arrangement of the doors.

Both containments are entered approximately once each week for performance of routine inspections and minor maintenance. If we were to perform the inspection program required by Operating Procedure 13514.1 after each airlock opening, routine entry of the containment would become impractical due to the many man-hours which would be necessary for leak testing. Therefore, in order to continue a viable containment inspection program, and at the same time achieve compliance with the intent of Appendix J, we submitted a proposed Technical Specification change on September 20, 1974, which provided for the performance of an "O"-ring vacuum test instead of a pressure test. We have designed and built a vacuum test device which could be duplicated and permanently installed on all airlock outer doors and used to leak test the doors after each opening. Pending disposition of the proposed change, however, we are currently complying with the existing Technical Specification 4.4.2.2 requirement which requires airlock testing once every four months.

- (2) Appendix J, Section III.D.2, requires that all Type B tests with the exception of airlock tests, be performed during each reactor shutdown for refueling, or other convenient interval, but in no case at intervals greater than two years. Turkey Point Technical Specification 4.4.2.5 requires that Type B electrical penetration leak tests be performed prior to the less frequent Type A integrated leak tests. We have been complying with the Appendix J requirement. However, as reported in Semiannual Operating Reports 5 and 6, we have had no measurable leakage from electrical canisters. We would therefore propose that the Technical Specification requirement is adequate with respect to the test frequency and that we be exempted from the requirements of Appendix J, Section III.D.2 with respect to Type B electrical penetration leak tests.
- (3) There are minor differences in terminology between Appendix J and the Technical Specification sections which pertain to containment leak rate testing. Our



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proposed Technical Specification change of September 20, 1974, contains minor revisions which would eliminate these differences.

In summary:

The Turkey Point containment leak testing program satisfies Appendix J requirements in all respects except for the frequency of testing airlocks.

The Turkey Point Technical Specifications agree with Appendix J except for minor terminology differences, the frequency of airlock testing, and the frequency of electrical penetration testing.

We submitted a proposed Technical Specification amendment on September 20, 1974, which would eliminate terminology differences and permit us to vacuum test airlocks after each use.

We feel that our history of no measurable electrical penetration leakage supports our proposal to reduce the frequency of electrical penetration leak testing even though in practice we are complying with the Appendix J frequency requirement.

Very truly yours,

  
Robert E. Uhrig  
Vice President

REU:MAS:nch

cc: Jack R. Newman, Esq.