

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

TO: Mr. Victor Stello, Jr.

FROM: Florida Power & Light Company
Miami, Florida
Robert E. Uhrig

DATE OF DOCUMENT 4/28/77

DATE RECEIVED 5/3/77

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DESCRIPTION

Ltr. trans the following:

(2-P)

PLANT NAME:
Turkey Point Units 3 & 4

RJL

ENCLOSURE

Concerns Amdt. to QL/change to tech specs
..notorized 4/28/77..concerns their inservice
examination and testing program....

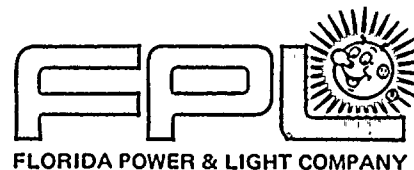
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<input checked="" type="checkbox"/> BRANCH CHIEF:		(5)		BRANCH CHIEF:	
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INTERNAL DISTRIBUTION			
<input checked="" type="checkbox"/> REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
<input checked="" type="checkbox"/> NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
<input checked="" type="checkbox"/> I & E (2)	SCHROEDER	BENAROYA	DENTON & MILLER
<input checked="" type="checkbox"/> OELD		LAINAS	
<input checked="" type="checkbox"/> GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACARRY	KIRKWOOD	ERNST
CASE	BOSNAK		BALLARD
HANAUER	SIHWEL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT (2)	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
HOUSTON	ROSZTOCZY	BAER	
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLMER
HEITEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		J. COLLINS
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION			CONTROL NUMBER
<input checked="" type="checkbox"/> LPDR:	NAT. LAB:	BROOKHAVEN NAT. LAB.	771250319
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ASLB:	CONSULTANTS:		
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April 28, 1977
L-77-130

Regulatory

File 67

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



Dear Mr. Stello:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed Amendment to Facility
Operating Licenses DPR-31 and DPR-41

On February 25, 1977, our letter L-77-58, Florida Power & Light Company submitted proposed Valve Test, Pump Test, and Inservice Inspection Programs for Turkey Point Unit 4 in response to a November 22, 1976 letter from Mr. George Lear of your office.

Before the program can be fully implemented after approval, numerous procedures will have to be written or modified. Approximately 6 months will be needed to develop the required procedures and implement our proposed program. Due to the magnitude of effort involved, it will not be practical to commence the modification and preparation of the required procedures until the proposed program, including Technical Specifications, has been accepted by your staff.

Florida Power & Light Company respectfully requests, in accordance with 10 CFR 50.12, an exemption from the requirements of 10 CFR 50.55a(g) (4) (v), and from Technical Specifications revised in accordance with 10 CFR 50.55a(g) (5) (ii) for a period ending six months subsequent to the Nuclear Regulatory Commission's approval of the proposed inservice examination and testing program. Until that time, we plan to comply with the existing Technical Specification surveillance requirements.

Our request for exemption has been reviewed by the Turkey Point Plant Nuclear Safety Committee (PNSC) and the Florida Power & Light Company Nuclear Review Board (CNRB) with the following conclusions:

- 1) The proposed inservice examination and testing program provides some additional assurance over the already adequate requirements of the Facility Technical Specifications that certain

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To: Victor Stello, Jr., NRC
Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

safety-related components are functioning properly.

- 2) Delay in implementing this proposed program will not endanger life or property or the common defense and security.
- 3) Ensuring the careful preparation, review, and approval of implementing procedures prior to implementation of the proposed program is in the public interest.
- 4) The request for exemption, as stated above, is necessary, and the time period of the exemption is appropriate.

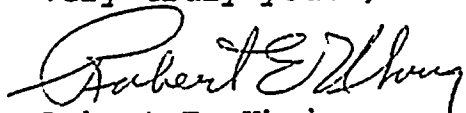
As a result of this exemption request, we have modified one page of the proposed amendment that was also submitted under the February 25th cover letter. In accordance with 10 CFR 50.30, three (3) originals and forty (40) copies of our modified amendment request are enclosed. The proposed change is described below and shown on the accompanying Technical Specification page bearing the date of this letter in the lower right hand corner.

Page 4.2-1a

New page 4.2-1a is modified to conform with our request for exemption from the implementation requirements of 10 CFR 50.55a.

The PNSC and CNRB have also reviewed the proposed Technical Specification change and have concluded that it does not involve an unreviewed safety question.

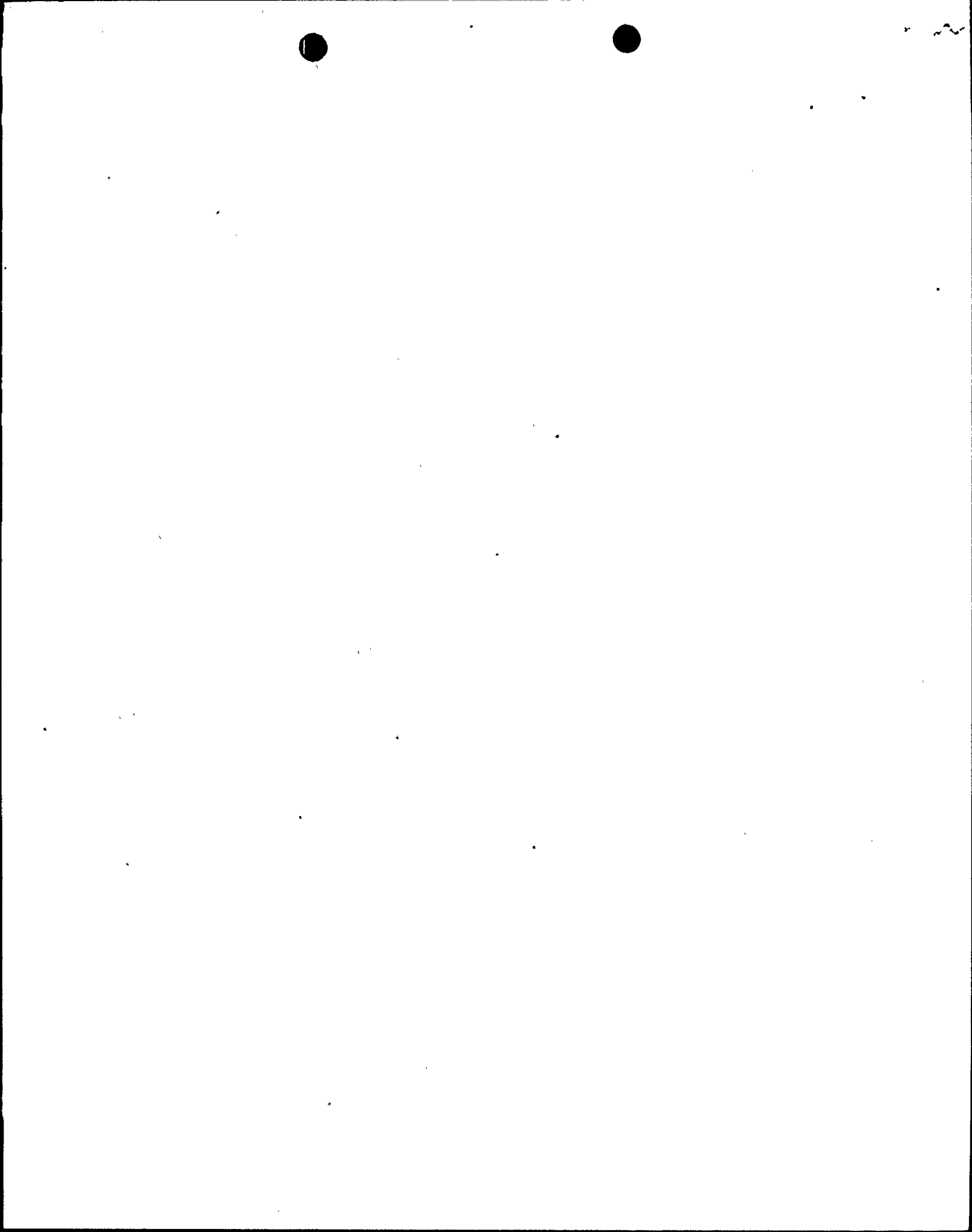
Very truly yours,



Robert E. Uhrig
Vice President

REU/GDW/MAS/hlc
Enclosure

cc: Norman C. Moseley, Region II
Robert Lowenstein, Esq.



UNIT 4

4.2 INSERVICE INSPECTION AND TESTING

- Applicability:** Applies to inservice structural surveillance of ASME Code Class 1, Class 2, and Class 3 components.
- Objective:** To ensure the continued integrity of ASME Code Class 1, Class 2, and Class 3 components (and their supports) and boundaries.
- Specification:**
1. Inservice inspection of ASME Code Class 1, Class 2, Class 3 components shall be performed in accordance with the Turkey Point Unit 4 Inservice Inspection (ISI) Program. The ISI Program is developed and updated in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the NRC, pursuant to 10 CFR 50.55a(g)(6)(i).
 2. Inservice testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with the Turkey Point Unit 4 Pump and Valve Test Programs. The Programs are developed and updated in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50.55a(g)(6)(i).
 3. In cases where, during the process of inspection and testing, certain requirements are found to be impractical due to unforeseen circumstances, relief may be requested at that time and satisfaction of these requirements may be deferred pending NRC action on the request.



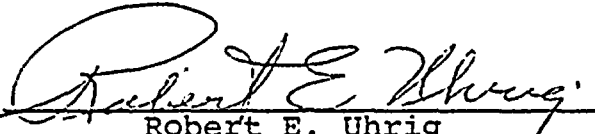
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STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

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

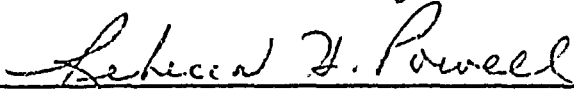
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments 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

28th day of April, 1977


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

My commission expires:

NOTARY PUBLIC STATE OF FLORIDA at LAW
MY COMMISSION EXPIRES APRIL 2, 1980
BONDED THROUGH HAWAIIAN BONDING AGENCY