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FROM: Florida Power & Light Co Miami, Fla R EnJhrig		DATE OF DOC 7-11-75	DATE REC'D 7-16-75	LTR XXX	TWX	RPT	OTHER
TO: Mr Giambusso		ORIG one signed	CC	OTHER	SENT NRC PDR <u>XX</u>		SENT LOCAL PDR <u>XX</u>
CLASS	UNCLASS XXXXXXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-250/251		

DESCRIPTION:  
  
Ltr notarized 7-11-75...trans the following:  
  
PLANT NAME: Turkey Point 2 & 3

ENCLOSURES:  
  
Expanded Safety Evaluation of proposed change to Tech Specs 4.4.6...dtd 6-13-75..... to be attached to original submittal....  
  
(40 cys encl rec'd)

FOR ACTION/INFORMATION 7-15-75 chf

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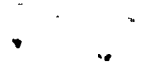
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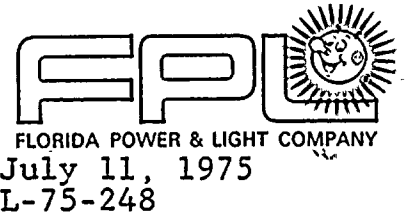
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**LABORATORY DOCKET FILE COPY**

Mr. Angelo Giambusso, Director  
Division of Reactor Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Dear Mr. Giambusso:

Re: Turkey Point Plant Unit Nos. 3 & 4  
(Docket Nos. 50-250 & 50-251) Addendum  
to Proposed Amendment to Facility Operating  
Licenses DPR-31 and DPR-41

On June 13, 1975, a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 was submitted to you in accordance with 10 CFR 50.30. The proposed amendment concerned Technical Specification 4.4.6 relating to Tendon Surveillance.

An expanded Safety Evaluation of the proposed change for Technical Specification 4.4.6 has been prepared for attachment to the June 13th submittal. It is herewith submitted in forty (40) copies with three (3) signed originals in accordance with 10 CFR 50.30.

Yours very truly,

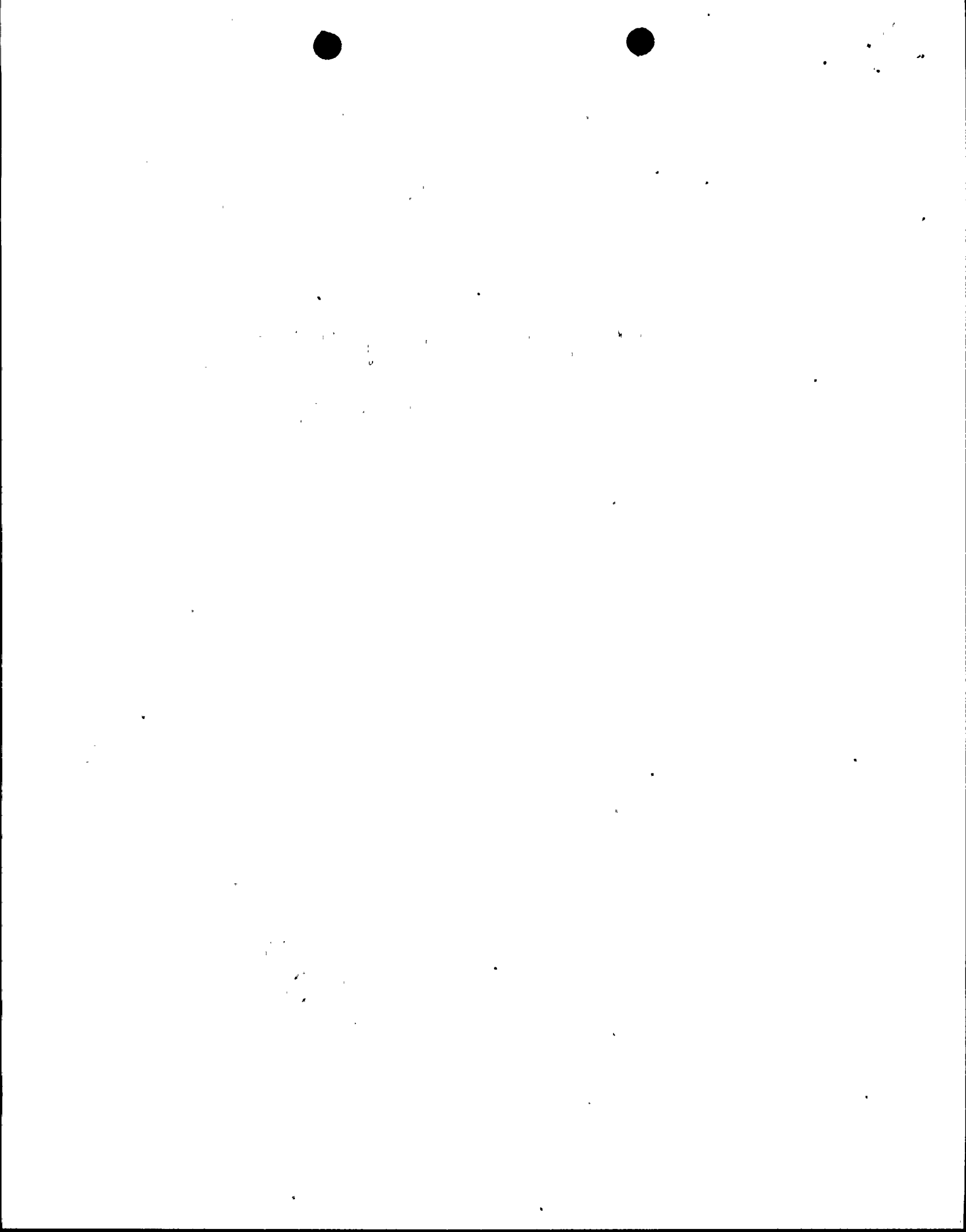
*Robert E. Uhrig*  
Robert E. Uhrig  
Vice President

REU:LLL:nch  
Attachment

cc: Mr. Norman C. Moseley  
Jack R. Newman, Esquire



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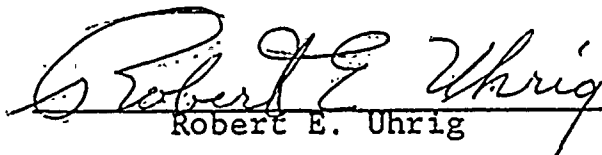


STATE OF FLORIDA )  
                          )    SS  
COUNTY OF DADE    )


ROBERT E. UHRIG, being first duly sworn, deposes and says;

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

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

  
Robert E. Uhrig

Subscribed and sworn to before me  
this July 11 day of July, 1975

  
Notary Public in and for the County  
of Dade, State of Florida

My Commission expires \_\_\_\_\_

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXPIRES JAN. 26, 1979  
BONDED THRU GENERAL INSURANCE UNDERWRITERS



SAFETY EVALUATION OF PROPOSED TECHNICAL  
SPECIFICATION CHANGE REGARDING TENDON SURVEILLANCE

General Design Criterion 53, "Provisions for Containment Testing and Inspection" of Appendix A, "General Design Criteria for Nuclear Power Plants", to 10 CFR Part 50, "Licensing of Production and Utilization Facilities", requires in part, that the reactor containment be designed to permit (1) periodic inspection of all important areas and (2) an appropriate surveillance program. The containment design of Turkey Point Units 3 and 4 provides a pre-stressed concrete structure with ungrouted tendons. An inservice inspection program for surveillance of these tendons was established and is specified in Section 4.4.6 of Appendix A to License Nos. DPR-31 and DPR-41.

Surveillance Tendons were chosen such that a sample was obtained from each major tendon type (dome, vertical and hoop). The specific choices within each type were selected to provide tendons which were subject to various environmental exposures. Technical Specification 4.4.6 describes the specific items to be covered on each surveillance tendon.

The proposed Technical Specification change requests that Technical Specification 4.4.6 for Unit 4 be changed to substitute Horizontal Tendons 13H38, 42H57, and 64H70 for the specified 13H15, 51H50, and 35H70 and Dome Tendon 2D14 for the specified 2D28. In preparing for

the Turkey Point Unit 4 Tendon Surveillance scheduled for accomplishment during August, 1975, it was found that surveillance on several of the original tendons required that personnel perform work in the area of the main steam relief valve discharge. In addition one tendon was not accessible due to an obstruction in the path of the skyclimber. Working in the area of the relief valve discharge would expose the workmen to an unnecessary hazard should a safety valve or the atmospheric steam relief valve be required to open. It was therefore determined that substitute tendons should be selected which could be inspected without adversely affecting the safety of personnel. The surveillance using the substitute tendons will be performed in the same manner, using the same equipment, as that proposed for the original tendons.

An examination of Figures 1,2 and 3, submitted in the 6/13/75 proposed change, shows that the original horizontal surveillance tendons covered a full 360 degrees of the containment at various elevations. A review of these same figures shows that less than a 60 degree section of the Unit No. 4 containment is not covered by the proposed surveillance tendons. An examination of the Unit No. 3 surveillance tendons listed in Technical Specification 4.4.6 shows that a full 360 degrees of the Unit No. 3 containment is covered, thereby providing a full environmental exposure. Despite this difference in coverage of the containments of each unit, as outlined below, it is believed that the surveillance program will be adequate to meet its intent.



Regulatory Guide 1.35, paragraph C.2, states a regulatory position which provides a method of inspecting only one out of two containments located on the same site. The Turkey Point Units 3 & 4 containments were built by the same contractor at approximately the same time; they are located less than 1000 ft apart and experience the same environmental exposures. Thus, as indicated in paragraph C.2, paragraph C.7 of Regulatory Guide 1.35, which allows a visual inspection of tendons, could be applied to Unit No. 4; the total 360 degree hoop tendon surveillance obtained from the Unit No. 3 surveillance tendons would be applicable for both units.

FSAR Page 5.1.2-6 states that any 3 adjacent tendons in any group (dome, vertical or horizontal) can be lost without affecting the structure's integrity. FSAR Section 5.1.7.4 (pg 5.1.7-6) states that the surveillance tendons (9 in total number) are in excess of design requirements. Also both the FSAR (Section 5.1.7.4) and Technical Specification 4.4.6 require that the surveillance tendons be retensioned to the stress level measured in the tendon at the lift-off reading. Thus the surveillance tendons are still available to perform the tendon design function.

It is therefore concluded that the containment structural integrity is not degraded by using the proposed surveillance tendons, that data relative to the tendon integrity obtained from the proposed surveillance tendons will be the equivalent of the existing surveillance tendons, and that the surveillance program with the proposed surveillance tendons meets the intended requirement of General Design Criterion 53 and Technical

Specification 4.4.6. On this basis, it is further concluded that this change does not involve an unreviewed safety question as defined by 10 CFR Part 50.59 (a) (2).



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