UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	Docket Nos. 50-250
	)	and 50-251
FLORIDA POWER AND LIGHT COMPANY	)	
	)	
	)	
(Turkey Point Plant, Unit Nos. 3 and 4)	)	

ORDER CONFIRMING LICENSEE COMMITMENTS
ON POST-TMI RELATED ISSUES

I.

Florida Power and Light Company (the licensee) is the holder of Facility Operating License Nos. DPR-31 and DPR-41 which authorize the operation of the Turkey Point Plant, Unit Nos. 3 and 4 (the facilities) at steady-state power level not in excess of 2200 megawatts thermal. The facilities are pressurized water reactors (PWRs) located at the licensee's site in Dade County, Florida.

II.

Following the accident at Three Mile Island Unit No. 2 (TMI-2) on March 28, 1979, the Nuclear Regulatory Commission (NRC) staff developed a number of proposed requirements to be implemented on operating reactors and on plants under construction. These requirements include Operational Safety, Siting and Design, and Emergency Preparedness and are intended to provide substantial

additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

(1) For applicable items that have been completed, confirmation of completion and the date of completion, (2) for items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and (3) justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

Florida Power and Light Company responded to Generic Letter 82-05 by letters dated April 8, April 27, June 9, July 9, August 12, November 15, 1982, January 28, February 10 and 28, 1983; Florida Power and Light Company responded to Generic Letter 82-10 by letters dated July 2, July 22, and October 12, 1982. In these submittals, Florida Power and Light Company confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are six items from Generic Letter 82-10 that, as noted in the Table (Attachment 2), have licensee schedules to be determined and are therefore not included in this Order. Some of the items addressed in this Order are considered by the licensee to be completed or to require no modifications. The staff's evaluation of the licensee's delays for the remaining items is provided herein:

II.B.2 Plant Shielding

For this item all modifications have been completed except for replacing containment isolation valves CV 2819 and CV 2826 (air bleed valves used in the "pump back system") with valves that are qualified to operate in a post-LOCA environment. The delay in installing these valves is the result of late delivery of the valves and the necessity of at least a seven day

outage for installation and checkout. The valves will be installed in Unit No. 4 during the current steam generator repair (SGR) outage (October 1982 - June 1983) and Unit No. 3 during the next refueling outage currently scheduled for September 1983.

II.B.3 Post-Accident Sampling

The Post-Accident Sampling System has been installed with the exception of the chloride analyzer and boronmeter. The chloride analyzer has not been shipped from the manufacturer and the boronmeter was returned due to operability problems. The expected delivery of the chloride analyzer is March 4, 1983 and the boronmeter is March 14, 1983. The licensee has committed to have the system operable by August 1, 1983.

The licensee is evaluating onsite or offsite methods to be used to analyze the backup grab samples the system is designed to take. In addition, they are participating with the Westinghouse Owners Group in assessing the relationship between radionuclide concentrations and core damage. Both of these items will be complete by March 1, 1984.

II.E.1.2 Auxiliary Feedwater Automatic Initiation and Flow Indication

A. Automatic Initiation

The as-built system is safety-grade. The actuation of the pressure regulating valves for the steam supply to the AFW pumps, which are shared by both units, is not designed in accordance with the single failure criteria. These valves are being removed and long-term modifications (new turbines and redundant piping) are being installed during the current Unit No. 4 SGR outage (October 1982 - June 1983).

Two of three AFW steam supply valve actuators are being changed from AC to DC. This is being accomplished for Unit No. 4 during the SGR outage. The Unit No. 3 valves will be modified during the next refueling outage currently scheduled for September 1983.

II.F.1 (1-6) Post-Accident Monitoring (6 items)

(1) Noble Gas Monitor - System installed. Modifications being implemented to provide isokinetic sampling due to initial system operability problems. Modifications scheduled for completion by June 30, 1983.

(2) Iodine Particulate Monitoring - The systems have experienced severe problems due to moisture accumulation. New moisture traps are scheduled for installation February 28, 1983 for Unit 3 and the system will be operable by March 1, 1983. Unit 4 system will be modified and operational by September 15, 1983.

(6) Containment Hydrogen Monitor - Installation complete. Both trains in Unit 4 and one train in Unit 3 will be complete by March 31, 1983. The other train in Unit 3 is a one-inch pipe compared to 3/8 inch for the other trains. A temperature of 300 F is necessary and heat tracing is a problem which may require a redesign. The train will be operable by March 1, 1984.

III.D.3.4 Control Room Habitability

The proposed "short-term" and "long-term" modifications identified as the result of the licensee's control room habitability study have been combined into a single completion date of July 1, 1983 for both Unit Nos. 3 and 4. The combined schedule is due to the inter-relationship between control room design review covered by NUREG-0737 Item II.D.1 and problems with equipment procurement and delivery.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the delays (unexpected design complexity, interface problems, and equipment delays); and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitment should be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

V.

The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order. This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

for Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14th day of March, 1983.

Attachments:
1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

PLANT NAME: Turkey Point
Units 3 and 4

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.A.3.1	Simulator Exams	Superseded by Generic Ltr. 82-18	Include simulator exams in licensing examinations.	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions.	Unit 3 - Refueling outage (9/83) Unit 4 - Steam Generator Repair (SGR) Outage (10/82-6/83)
II.B.3	Post-accident sampling	1/1/82	Install upgrade post-accident sampling capability.	Units 3 & 4 - March 1984
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program.	Complete
II.E.1.2	Aux FW Indication & Flow Indicator	7/1/81	Modify instrumentation to level of safety grade.	Unit 3 - refig. outage (9/83) Unit 4 - SGR outage (10-82 - 6/83).
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5 - lower containment pressure setpoint to level compatible with normal operation.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 7 - isolate purge and vent valves on radiation signal.	Complete

*Where complete date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

PLANT NAME: Turkey Point
Units 3 and 4

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors.	June 30, 1983
		1/1/82	(2) Provide capability for effluent monitoring of iodine.	Unit 3 - March 1983 Unit 4 - September 1983
		1/1/82	(3) Install in-containment radiation-level monitor.	Complete
		1/1/82	(4) Provide continuous indication of containment pressure.	Complete
		1/1/82	(5) Provide continuous indication of containment water level.	Complete
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment.	Unit 3 - Train B March 1983 Train A March 1984 Unit 4 - Both trains March 1983

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 TIEMS FROM GENERIC LETTER 82-10 Attachment 2

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Gen. Ltr. No. 82-12, dtd. June 15, 1982.	Complete
I.A.1.3.2	**Minimum Shift Crew	To be superseded by Proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units.	To be determined when Final Rule is issued.
I.C.1	**Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability.	To be determined.
II.D.1.2	RV and SV Test Programs	7/1/82	Submit plant specific reports on relief and safety valve program.	Complete
II.D.1.3	Block Valve Test Program	7/1/82	Submit report of results of test program.	Complete
II.K.3.30 & 31	**SBLOCA Analysis	1 yr. after staff approval of model	Submit plant specific analyses.	To be determined following staff approval of model.
III.A.1.2	**Staffing Levels for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined.
III.A.1.2	**Upgrade Emergency Support Facilities	"" ""	"" ""	"" ""
III.A.2.2	**Meteorological Data	"" ""	"" ""	"" ""
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study	Unit 3 and 4 - 7/83

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.
**Not Part of Confirmatory Order