RELATED CORRESPONDENCE

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

DOCKETED

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 84 AGO 13 AI1:48

In the Matter of

FLORIDA POWER AND LIGHT COMPANY

(Turkey Point Nuclear Generating Units 3 & 4)

Docket Nos PR500250 OLA-1
50-251 OLA-1

ASLBP No. 84-496-03 LA

LICENSEE'S STATEMENT OF
MATERIAL FACTS AS TO
WHICH THERE IS NO
GENUINE ISSUE TO BE
HEARD WITH RESPECT TO
INTERVENORS' CONTENTION (b)

Pursuant to the requirements of 10 C.F.R. § 2.749(a),

Florida Power & Light Company ("Licensee") offers the following

statement of material facts as to which there is no genuine

issue to be heard in support of "Licensee's Motion for

Summary Disposition of Intervenors' Contention (b)."

(1) Intervenors' Contention (b) questions whether or not "a 2.2% reduction in re-flood rate" has been properly accounted for in analysis by means of the Westinghouse Emergency Core Cooling System (ECCS) evaluation model utilizing the "BART-Al: Computer Code for the Best Estimate Analysis of Reflood Transients" (BART computer code).

- (2) Section 50.46 of Nuclear Regulatory Commission regulations requires that ECCS analysis be performed with an acceptable evaluation model and result in a calculated maximum fuel element cladding temperature not greater than 2200° F.
- (3) ECCS analysis has been performed for the Turkey
 Point units with an evaluation model utilizing the BART code
 which has been found acceptable and approved by the NRC.
 Affidavit of Mark J. Parvin, ¶¶ 4, 5 and 9, August 3, 1984
 (included as Attachment to "Licensee's Motion for Summary
 Disposition of Intervenors' Contention (b)," August 10,
 1984) [hereinafter cited as Parvin Affidavit].
- (4) ECCS evaluation model analysis utilizing the BART code results in a peak clad temperature of 1972° F for a homogeneous core. For the limited, transitional period when optimized fuel assembly (OFA) and low-parasitic (LOPAR) fuel are mixed in the core, however, an approximately 2.2% reduction in OFA reflood steam flow rate occurs resulting in approximately a 10° F increase in peak clad temperature (PCT), which is easily accommodated in the margin to the 2200° F 10 C.F.R. § 50.46 limits. Parvin Affidavit, ¶ 5.
- (5) ECCS analysis has also been performed for a homogeneous core with the previously approved evaluation model utilizing the Westinghouse Full Length Emergency Cooling Heat Transfer (FLECHT) correlation, resulting in an indicated peak clad temperature of 2130° F. A 10° F increase in

temperature due to a mixed LOPAR and OFA core also results in a PCT less than the 2200° F limit prescribed in 10 C.F.R. § 50.46. Parvin Affidavit, ¶ 8.

(6) Required analyses, properly taking into account reduced reflood flow rates in the OFA regions of the core, have been performed for Turkey Point yielding results consistent with applicable NRC criteria. Parvin Affidavit, 9.

Respectfully submitted,

Harold Reis Michael A. Bauser Steven P. Frantz

Newman & Holtzinger, P.C. 1025 Connecticut Avenue, N.W. Washington, D.C. 20036 (202) 862-8400

Of Counsel:

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Norman A. Coll Steel, Hector & Davis 4000 Southeast Financial Center Miami, FL 33131-2398 (305) 577-2800

Dated: August 10, 1984