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 HARRIS, K.N.    Florida Power & Light Co.  
 RECIP.NAME    RECIPIENT AFFILIATION  
 EBNETER, S.D.    Region 2, Ofc of the Director

SUBJECT: Documents written & verbal request of Region II personnel for temporary waiver of compliance of Tech Spec 3.4.2.b.1.

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Stewart D. Ebnetter  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta St., N.W., Suite 2900

Mr. Stewart D. Ebnetter:

Re: Turkey Point Unit 4  
Docket No. 50-251  
4A Emergency Containment Cooling Unit  
Temporary Waiver of Compliance

This letter documents a written and verbal request of Region II personnel for a temporary waiver of compliance of Technical Specification 3.4.2.b.1.

During the evening of July 4, 1990, during a flow test of the 4A Emergency Containment Cooler (ECC), inadequate Component Cooling Water flow was indicated and the cooler was declared out of service at 1900 hours. In accordance with Technical Specification 3.4.2.b.1 a 24 hour Limiting Condition for Operation (LCO) was entered. An event response team was formed and trouble shooting and appropriate repairs were begun. The actuator on the 4A Emergency Containment Cooler component cooling water discharge valve (CV-4-2907) was found to operate with no resultant operation of the valve. The operator has been removed and the shear pin between the valve and the operator has been found sheared. The manufacturer of the valve was contacted and identical material for the pin identified. Identical material is not available at Turkey Point but appropriate material with similar properties has been found. An engineering evaluation providing technical basis for the use of the similar pin material will be completed prior to the return of the valve to service. The repairs to the valve and subsequent post maintenance testing are expected to be complete within a few hours of 1900 on July 5, 1990.

The design basis for Emergency Containment cooling provides for adequate cooling with one containment spray train or two ECCs. With two ECCs still operable and two trains of spray available the capability of the Containment Cooling Systems to perform their function during an accident will be adequate.

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Based upon the above, FPL is requesting a temporary waiver of compliance of the allowable out of service time for one ECC from 24 hours to 72 hours with the following additional reasons:

1. The 72 hour LCO is consistent with the final draft of Turkey Point revised Technical Specification 3.6.2.2 Action:

"a. With one of the above required emergency containment cooling units inoperable restore the inoperable cooling unit to OPERABLE status with in 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

2. During the 48 hour extension, the remaining two ECCs and the two trains of containment spray will not be taken out of service for maintenance.
3. The 4B and 4C ECCs were run to prove their operability prior to performing maintenance on the 4A ECC.

Following review by the Plant Nuclear Safety Committee, approval of this document was recommended to the Plant Manager. The Plant manager subsequently approved this document.

Very truly yours,



K. N. Harris  
Vice President - Turkey Point Nuclear

KNH/JEK/jk

cc: Document Control Desk, USNRC  
Dr. G. E. Edison, Project Manager, NRR, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant