Template NRR-058

March 21, 2000

Mr. T. F. Plunkett
President - Nuclear Division
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS REGARDING TECHNICAL SPECIFICATION CHANGES IN ACCORDANCE WITH GENERIC LETTER 99-02 (TAC NOS. MA7213 AND MA7214)

Dear Mr. Plunkett:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 205 to Facility Operating License No. DPR-31 and Amendment No. 199 to Facility Operating License No. DPR-41 for the Turkey Point Plant, Units Nos. 3 and 4, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated November 23, 1999, as supplemented by a letter dated March 9, 2000.

The amendments revise the TS surveillance testing of the safety-related ventilation system charcoal to meet the actions requested in Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999. The systems impacted are the emergency containment filtering system, post accident containment vent system, and the control room emergency ventilation system.

A copy of the Safety Evaluation (SE) is also enclosed. Attached to the SE is a Technical Evaluation Report from Brookhaven National Laboratory. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,
/RA/

Kahtan N. Jabbour, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosures:
1. Amendment No. 205 to DPR-31
2. Amendment No. 199 to DPR-41
3. Safety Evaluation

cc w/enclosures: See next page

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* Provided J. Segala, OGC agreed with comments

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 21, 2000

Mr. T. F. Plunkett
President - Nuclear Division
Florida Power and Light Company
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The amendments revise the TS surveillance testing of the safety-related ventilation system charcoal to meet the actions requested in Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999. The systems impacted are the emergency containment filtering system, post accident containment vent system, and the control room emergency ventilation system.

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cc w/enclosures: See next page

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 205
License No. DPR-31

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power and Light Company (the licensee) dated November 23, 1999, as supplemented by a letter dated March 9, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:

   (B) Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 205, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

2. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 21, 2000

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 199
License No. DPR-41

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power and Light Company (the licensee) dated November 23, 1999, as supplemented by a letter dated March 9, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-41 is hereby amended to read as follows:

   (B) Technical Specifications and Environmental Protection Plan

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 199, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 21, 2000

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 205 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 199 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

Remove pages	Insert pages
3/4 6-15	3/4 6-15
3/4 6-20	3/4 6-20
3/4 7-17	3/4 7-17

3/4.6.3 EMERGENCY CONTAINMENT FILTERING SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.3 Three emergency containment filtering units shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one emergency containment filtering unit inoperable, restore the inoperable filter to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3 Each emergency containment filtering unit shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes;

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following operational exposure of filters to effluents from painting, fire, or chemical release or (3) after every 720 hours of system operation by:

1) Performance of a visual inspection for foreign material and gasket deterioration, and verifying that the filtering unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of greater than or equal to 99% removal of DOP and halogenated hydrocarbons at the system flow rate of 37,500 cfm ±10%;

2) Verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with applicable portions of Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, and performed in accordance with ASTM D3803-1989 at 30°C and 95% relative humidity, meets the methyl iodide penetration criteria of less than 35% and that any charcoal failing to meet this criteria be replaced with charcoal that meets or exceeds the stated performance requirement; and

3) Verifying a system flow rate of 37,500 cfm ±10% and a pressure drop across the HEPA and charcoal filters of less than 6 inches water gauge during system operation when tested in accordance with ANSI N510-1975;

CONTAINMENT SYSTEMS

3/4.6.6 POST ACCIDENT CONTAINMENT VENT SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.6 A Post Accident Containment Vent System shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

With the Post Accident Containment Vent System inoperable, restore the Post Accident Containment Vent System to OPERABLE status within 7 days or be in at least HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

4.6.6 The Post Accident Containment Vent System shall be demonstrated OPERABLE:

a. At least once per 31 days by demonstrating system flow path operability via a system walkdown to verify that each accessible manual valve is in its correct position.

b. At least once per 18 months or (1) after any structural maintenance of the HEPA filter or charcoal adsorber housings, or (2) following operational exposure of filters to effluents from painting, fire, or chemical release in any ventilation zone communicating with the system, or (3) after 720 hours of system operation or (4) after replacement of a filter by:

1) A visual inspection of the system for foreign materials and gasket deterioration and verifying that the filter system satisfies the penetration and bypass leakage testing acceptance criteria of less than 1% for DOP and halogenated hydrocarbon tests conducted at a design flow rate of 55 cfm ±10%;

2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample performed in accordance with ASTM D3803 – 1989 at 30°C and 95% relative humidity, meets the methyl iodide penetration criteria of less than 10% and that any charcoal failing to meet the criteria be replaced with charcoal that meets or exceeds the stated performance requirement.

SURVEILLANCE REQUIREMENTS (Continued)

1) Verifying that the air cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of greater than or equal to 99% DOP and halogenated hydrocarbon removal at a system flow rate of 1000 cfm ±10%.

2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, and analyzed per ASTM D3803 – 1989 AT 30°C and 95% relative humidity, meets the methyl iodide penetration criteria of less than 2.5% or the charcoal be replaced with charcoal that meets or exceeds the stated performance requirement, and

3) Verifying by a visual inspection the absence of foreign materials and gasket deterioration.

d. At least once per 12 months by verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 1000 cfm ±10%;

e. At least once per 18 months by verifying that on a Containment Phase "A" Isolation test signal the system automatically switches into the recirculation mode of operation.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 205 TO FACILITY OPERATING LICENSE NO. DPR-31

AND AMENDMENT NO. 199 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated November 23, 1999 (L-99-239), as supplemented March 9, 2000, Florida Power and Light Company (FPL) requested changes to the Technical Specification (TS) for Turkey Point Units 3 and 4 in response to the actions requested in Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999. The proposed changes would revise TS 3/4.6.3, "Emergency Containment Filtering System (ECFS)," TS 3/4.6.6, "Post Accident Containment Vent System (PACVS)," and TS 3/4.7.5, "Control Room Emergency Ventilation System (CREVS)," to meet the actions requested in GL 99-02. Specifically, FPL proposes to change the TS to require testing of charcoal filters in accordance with the protocol set forth in ASTM D3803-1989. The March 9, 2000 (L-2000-068), submittal provided clarifying information that did not change the scope of the original request and, therefore, it did not affect the proposed no significant hazards consideration determination.

2.0 EVALUATION

The U.S. Nuclear Regulatory Commission (NRC) staff, with technical assistance from Brookhaven National Laboratory (BNL), has reviewed FPL's submittals. In addition, the staff has reviewed the attached BNL Technical Evaluation Report (TER) regarding the proposed TS changes for Turkey Point Units 3 and 4. Based on its review, the staff adopts the TER. In addition, the penetration acceptance criterion that would be established for the PACVS by the proposed changes to the TS is equivalent to the removal efficiency currently in the TS. Also, the proposed penetration acceptance criteria for the ECFS and CREVS are equivalent to the removal efficiencies credited in the plant safety analyses with a safety factor of 2, as specified in GL 99-02. In view of the above, and because the staff considers ASTM D3803-1989 to be the most accurate and most realistic protocol for testing charcoal in safety-related ventilation systems, the staff finds that the proposed TS changes satisfy the actions requested in GL 99-02 and are acceptable.

3.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. Nuclear Regulatory Commission, the State of Florida does not desire notification of issuance of license amendments.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes in surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (64 FR 70089). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

Based on the staff evaluation in Section 2.0 above, the staff concludes that the proposed TS changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: John P. Segala, NRR/DSSA
Kahtan N. Jabbour, NRR/DLPM

Attachment: BNL Technical Evaluation Report

Date: March 21, 2000

ATTACHMENT

TECHNICAL EVALUATION REPORT
BROOKHAVEN NATIONAL LABORATORY
FOR THE OFFICE OF NUCLEAR REACTOR REGULATION
DIVISION OF SYSTEMS SAFETY AND ANALYSIS
PLANT SYSTEMS BRANCH
RELATED TO AMENDMENT TO FACILITY OPERATING LICENSE NO.DPR-31 AND DPR-41
FLORIDA POWER AND LIGHT
TURKEY POINT UNITS 3 AND 4
DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated November 23, 1999, Florida Power & Light (FPL or the licensee) submitted its response to the actions requested in Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999, for Turkey Point Units 3 & 4. Also, by letter dated November 23, 1999, Florida Power & Light requested changes to the Technical Specifications (TS) Sections 3/4.6.3, "Emergency Containment Filtering System (ECFS)," 3/4.6.6, "Post Accident Containment Vent System (PACVS)," and 3/4.7.5, "Control Room Emergency Ventilation System (CREVS)," for Turkey Point Units 3 & 4. The proposed changes would revise the TS surveillance testing of the safety related ventilation system charcoal to meet the requested actions of GL 99-02. In addition, by another letter dated March 9, 2000, (L-2000-068), FPL submitted additional information supplementing its response to the actions requested in GL 99-02.

2.0 BACKGROUND

Safety-related air-cleaning units used in the ventilation systems of nuclear power plants reduce the potential onsite and offsite consequences of a radiological accident by absorbing radioiodine. Analyses of design basis accidents assume particular safety related charcoal adsorption efficiencies when calculating offsite and control room operator doses. To ensure that the charcoal filters used in these systems will perform in a manner that is consistent with the licensing basis of a facility, licensees have requirements in their TS to periodically perform a laboratory test (in accordance with a test standard) of charcoal samples taken from these ventilation systems.

In GL 99-02, the staff alerted licensees that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with their current licensing basis as it relates to the dose limits of General Design Criterion (GDC) 19 of Appendix A to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR) and Subpart A of 10 CFR Part 100.

GL 99-02 requested that all licensees determine whether their TS reference ASTM D3803-1989 for charcoal filter laboratory testing. Licensees whose TS do not reference ASTM D3803-1989 were requested to either amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol.

3.0 EVALUATION

3.1 Laboratory Charcoal Sample Testing Surveillance Requirements

The current and proposed laboratory charcoal sample testing TS surveillance requirements for the emergency containment filtering system (ECFS), post accident containment ventilation system (PACVS), and control room emergency ventilation system (CREVS) are shown in Table 1 and Table 2, respectively.

The proposed use of ASTM D3803-1989 is acceptable because it is consistent with the actions requested in GL 99-02. The proposed test temperature of 30 °C and relative humidity (RH) of 95 percent is acceptable because it is consistent with ASTM D3803-1989 and the actions requested in GL 99-02.

The PACVS charcoal filter efficiency is not credited in the facility's accident analyses. Therefore, there is neither a credited efficiency nor a safety factor for the system. As a result, the proposed TS methyl iodide test efficiency of 90 percent is acceptable because it is the same value that was previously approved. The credited efficiencies for methyl iodide for the ECFS and CREVS are 30% and 95%, respectively. The proposed safety factors for these two systems are acceptable because they are equal to the minimum safety factor of 2 specified in GL 99-02.

Actual face velocity of the PACVS is 14 fpm and the corresponding residence time is 0.35 seconds, which is more conservative than the test residence time of 0.25 seconds. The actual face velocity of the ECFS is 40 fpm and that of the CREVS is 40 fpm (as stated in the FPL letter dated March 9, 2000). This is acceptable because it is consistent with the August 23, 1999 errata to GL 99-02.

4.0 CONCLUSION

On the basis of its evaluation, BNL recommends that the NRC staff conclude that the proposed TS changes are acceptable.

Principal Contributor: Mano Subudhi, BNL
Date: March 9, 2000

TURKEY POINT UNITS 3 AND 4

TABLE 1 - CURRENT TS REQUIREMENTS											
System Description						**Current TS Requirements**					
TS Section	System	Test Bed Thick-ness (inches)	Actual Charcoal		Credited Efficiency (%)	Test Penetration (%)	Safety Factor	Test Standard	Test Temp (° C)	Test RH	Test Face Velocity (fpm)
			Res. Time (Sec)	Face Velocity (fpm)							
3/4.6.3	ECFS	2	0.25	40	30MI 90EI	0.1 EI	Not Stated	ANSI N510-1975	130	95%	40
3/4.6.6	PACVS	1*	0.35	14	Not Used	10 MI	Not Applicable	ANSI N510-1975	25	70%	40
3/4.7.5	CREVS	2	0.25	40	95MI 95EI	1 MI	5	ANSI N510-1975	25	70%	40

* The filter bed consists of 8-1"charcoal beds arranged in a V-bank configuration; however, the 1" charcoal filters are emptied into 2" cannisters for laboratory testing.

TABLE 2 - PROPOSED TS REQUIREMENTS											
System Description						**Proposed TS Requirements**					
TS Section	System	Bed Thick-ness (inches)	Actual Charcoal		Credited Efficiency (%)	Test Penetration (%)	Safety Factor	Test Standard	Test Temp (° C)	Test RH	Test Face Velocity (fpm)
			Res. Time (Sec)	Face Velocity (Sec)							
3/4.6.3	ECFS	2	0.25	40	30 MI 90 EI	35	2	ASTM D3803-1989	30	95%	40
3/4.6.6	PACVS	1*	0.35	14	Not Used	10	Not Applicable	ASTM D3803-1989	30	95%	40
3/4.7.5	CREVS	2	0.25	40	95 MI 95 EI	2.5	2	ASTM D3803-1989	30	95%	40

* The filter bed consists of 8-1"charcoal beds arranged in a V-bank configuration; however, the 1" charcoal filters are emptied into 2" cannisters for laboratory testing.

Mr. T. F. Plunkett
Florida Power and Light Company

TURKEY POINT PLANT

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