



APR 27 2000

L-2000-061
10 CFR 50.36
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Administrative Changes to Facility
Operating Licenses and Technical Specifications

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend the Turkey Point Unit 3 Facility Operating License DPR-31 Fire Protection license condition 3.G, and to amend the Turkey Point Unit 4 Facility Operating License DPR-41 Fire Protection license condition 3.F. The proposed revisions to the Facility Operating Licenses are required to incorporate references to NRC Safety Evaluations issued in support of 10 CFR 50 Appendix R granted exemptions.

In addition, the proposed amendments modify Appendix A of the Facility Operating Licenses DPR-31 and DPR-41 of the Turkey Point Units 3 and 4 Technical Specifications (TS), Section 4.7.6.g. Due to an oversight, the submittal for the request of License Amendments No. 201/195 for Section 6.0 "Administrative Controls," L-99-056, dated March 8, 1999, discussed revision to TS Section 4.7.6.g on TS Page 3/4 7-21, but inadvertently did not attach the revised marked up Page 3/4 7-21. Subsequently, the NRC Safety Evaluation dated October 6, 1999, approving the License Amendments 201/195 also discussed revision to TS Section 4.7.6.g on TS Page 3/4 7-21, but did not provide the revised Page 3/4 7-21. The proposed revision to TS Section 4.7.6.g on TS Page 3/4 7-21 is being re-submitted with this letter for NRC approval.

FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR §50.92. A description of the amendments request is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specifications changes is provided in Attachment 2. Attachment 3 provides the proposed revised Facility Operating Licenses pages.

In accordance with 10 CFR §50.91(b)(1), a copy of these proposed license amendments are being forwarded to the State Designee for the State of Florida.

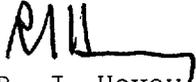
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The proposed license amendments have been reviewed by Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions on this request, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. J. Hovey', with a long horizontal flourish extending to the right.

R. J. Hovey
Vice President
Turkey Point Plant

OIH

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Florida Department of Health

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Administrative Changes to Facility
Operating Licenses and Technical Specifications

STATE OF FLORIDA)
) ss.
COUNTY OF MIAMI-DADE)

R. J. Hovey being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

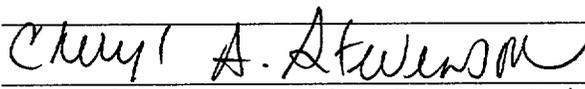
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



R. J. Hovey

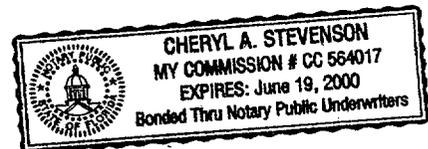
Subscribed and sworn to before me this

27th day of April, 2000.



Name of Notary Public (Type or Print)

Cheryl A. STEVENSON



R. J. Hovey is personally known to me.

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

The proposed amendments revise the Turkey Point Units 3 and 4 Facility Operating License to incorporate additional references which document the Appendix R exemptions granted by the NRC in support of the Turkey Point Units 3 and 4 Thermo-Lag Upgrade project. These proposed changes represent an administrative update to the Turkey Point Units 3 and 4 Facility Operating Licenses. Each of the proposed changes is discussed in detail below.

In addition, the proposed amendments modify Appendix A of the Facility Operating Licenses DPR-31 and DPR-41 of the Turkey Point Units 3 and 4 Technical Specifications (TS), Section 4.7.6.g. Due to an oversight, the submittal for the request of License Amendments No. 201/195 for Section 6.0 "Administrative Controls," L-99-056, dated March 8, 1999, discussed revision to TS Section 4.7.6.g on TS Page 3/4 7-21, but inadvertently did not attach the revised marked up Page 3/4 7-21. Subsequently, the NRC Safety Evaluation dated October 6, 1999, approving the License Amendments 201/195 also discussed revision to TS Section 4.7.6.g on TS Page 3/4 7-21, but did not provide the revised Page 3/4 7-21. The proposed revision to TS Section 4.7.6.g on TS Page 3/4 7-21 is being re-submitted.

Discussion and Description of Proposed Changes

The following changes shown in Attachment 3 are proposed:

1. FPL Docket No. 50-250 Facility Operating License

Revise the Operating License Condition 3.G, "Fire Protection," to add the following references:

1. NRC letter dated February 24, 1998, "Exemption from the Requirements of 10 CFR Part 50, Appendix R, for Turkey Point Units 3 and 4, Regarding Fire Barriers in Outside Areas, Excluding the Turbine Area (TAC NOS. M97422 and M97423)."
2. NRC letter dated October 8, 1998, "Exemption from Certain Requirements of 10 CFR Part 50, Appendix R, for Turkey Point Units 3 and 4, Regarding Fire Barriers in Outside Areas, Excluding the Turbine Area (TAC NOS. M97422 and M97423)."
3. NRC letter dated December 22, 1998, "Exemption from Certain Requirements of 10 CFR Part 50, Appendix R, for Turkey Point Units 3 and 4, Regarding Fire Barriers in the Turbine Building (TAC NOS. M99324 and M99325)."
4. NRC letter dated May 4, 1999, "Exemption from Certain Requirements of 10 CFR Part 50, Appendix R, for Turkey Point Units 3 and 4, Regarding Fire Zone 106R, Control Building Roof (TAC NOS. MA3972 and M3974)."

5. NRC letter dated May 5, 1999, "Issuance of a Revised Exemption and its Supporting Safety Evaluation for Fire Barriers in the Turbine Building - Turkey Point Plant, Units 3 and 4 (TAC NOS. MA4953 and MA4954)."

Justification: Section 3.G references the Fire Protection Program. The proposed change will incorporate the above references to exemptions from 10 CFR Part 50, Appendix R requirements which have been granted by the NRC.

License condition 3.G will be modified by adding the following NRC Safety Evaluation dates: February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999.

2. FPL Docket No. 50-251 Facility Operating License

Revise the Operating License Condition 3.F, "Fire Protection," to add the five references listed in Item 1. above.

Justification: Section 3.F references the Fire Protection Program. The proposed change will incorporate the above references to exemptions from 10 CFR Part 50, Appendix R requirements which have been granted by the NRC.

License condition 3.F will be modified by adding the following NRC Safety Evaluation dates: February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999, and May 5, 1999.

3. TS Section 4.7.6.g

Due to an oversight, the submittal for the request of License Amendments No. 201/195 for Section 6.0 "Administrative Controls," L-99-056, dated March 8, 1999, discussed revision to TS Section 4.7.6.g on TS Page 3/4 7-21, but inadvertently did not attach the revised marked up Page 3/4 7-21. Subsequently, the NRC Safety Evaluation dated October 6, 1999, approving the License Amendments 201/195 also discussed revision to TS Section 4.7.6.g on TS Page 3/4 7-21, but did not provide the revised Page 3/4 7-21.

The proposed revision to TS Section 4.7.6.g on TS Page 3/4 7-21 is being re-submitted for NRC approval.

Justification: The record retention requirements previously included in TS Section 6.10 (including TS 6.10.3m related to records of service lives of required hydraulic and mechanical snubbers) have been relocated to the UFSAR by License Amendments No. 201/195. Therefore, FPL proposes to revise the following TS page to reflect relocation of the record retention requirements from the TS to the UFSAR:

TS 4.7.6.g (Page 3/4 7-21). The proposed change to the last sentence of the first paragraph of TS Surveillance Requirement 4.7.6.g, "Snubber Service Life Monitoring Program" will be to remove the words, "... **as required by Specification 6.10.3m.**"

Environmental Consideration

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not:

- (i) involve a significant hazards consideration,
- (ii) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and
- (iii) result in a significant increase in individual or cumulative occupational radiation exposure.

The proposed license amendments revise the Turkey Point Units 3 and 4 Facility Operating License to incorporate additional references which document the Appendix R exemptions granted by the NRC in support of the Turkey Point Units 3 and 4 Thermo-Lag Upgrade project. In addition, the proposed Technical Specification changes reflect relocation of the record retention requirements from the TS to the UFSAR. The proposed license amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendments involve no significant hazards consideration and meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). FPL has determined, pursuant to 10 CFR 51.22(b), that an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Introduction

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR §50.92 (c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed below for the proposed amendments.

Discussion

- (1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed amendments do not involve an increase in the probability or consequences of an accident previously evaluated because the proposed changes are administrative in nature adding references to exemptions granted by the NRC and to reflect relocation of record retention requirements from the TS to the UFSAR. These amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

- (2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed changes to the Facility Operating Licenses and the Technical Specifications are administrative in nature and can not create the possibility of a new or different kind of accident from any previously evaluated since the proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. No new failure mode is introduced due to the administrative changes since the proposed changes do not involve the addition or modification of equipment nor do they alter the design or operation of affected plant systems, structures, or components.

- (3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.**

The operating limits and functional capabilities of the affected systems, structures, and components are unchanged by the proposed amendments. The proposed changes to the Facility Operating License Conditions and the TS are administrative in nature and do not reduce any of the margins of safety.

Based on the above, FPL has determined that the proposed amendments request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, (3) involve a significant reduction in a margin of safety; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR §50.92.

ATTACHMENT 3

**PROPOSED LICENSE AMENDMENTS FOR
ADMINISTRATIVE CHANGES TO FACILITY OPERATING LICENSES
AND TECHNICAL SPECIFICATIONS**

PROPOSED FACILITY OPERATING LICENSE DPR-31

page 3

PROPOSED FACILITY OPERATING LICENSE DPR-41

page 3

PROPOSED TECHNICAL SPECIFICATION CHANGE

Page 3/4 7-21

E. Steam Generator Inspections

DELETED

F. Physical Security

DELETED

G. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluation dated February 25, 1994, subject to the following provision.

INSERT A

The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

H. Safeguards Contingency Plan

DELETED

I. Steam Generator Repair Program

DELETED

J. Guard Training and Qualification Plan

DELETED

K. Integrated Schedule

DELETED

L. The license shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Turkey Point Physical Security Plan," with revisions submitted through December 1, 1999; "Turkey Point Plant, Units 3 and 4, Training and Qualification Plan," with revisions submitted through December 18, 1986; and "Turkey Point Plant, Units 3 and 4 Safeguards Contingency Plan," with revisions submitted through July 15, 1985. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

4. This license is effective as of the date of issuance, and shall expire at midnight July 19, 2012.

A. Maximum Power Level

The reactor shall not be made critical until the tests described in the applicant's letter of April 3, 1973, have been satisfactorily completed. Thereafter, the applicant is authorized to operate the facility at reactor core power levels not in excess of 2300 megawatts thermal.

B. Technical Specifications

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.

C. This license is subject to the following conditions for the protection of the environment;

- (1). The applicant shall pursue evaluations of alternatives to the proposed cooling channel system during construction, interim operation, and evaluation of the channel system. These evaluations shall include at least the following:
 - (a) Study of availability of groundwater or other alternative sources of surface water to use in the cooling system.
 - (b) Study of applicability of mechanical cooling devices, including powered spray modules and cooling towers.
 - (c) Study of marine environmental impacts of once through cooling alternatives (described in Section X of the AEC Final Environmental Statement on Turkey Point Units 3 and 4, July 1972).
- (2) The applicant shall take appropriate corrective action on any adverse effects determined as a result of monitoring and study programs. To the fullest extent practicable, the applicant shall utilize results of study programs in improving and modifying the operation of the facility and its cooling system so as to achieve a minimal adverse environmental impact.

D. Steam Generator Inspection

DELETED

E. DELETED

F. Fire Protection

FPL shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report (UFSAR) for Turkey Point Units 3 and 4 and as approved in the Safety Evaluation Report (SER) dated March 21, 1979 and supplemented by NRC letters dated April 3, 1980, July 9, 1980, December 8, 1980, January 26, 1981, May 10, 1982, March 27, 1984, April 16, 1984, August 12, 1987, and by Safety Evaluation dated February 25, 1994, subject to the following provision.

Insert A

Insert A

February 24, 1998, October 8, 1998, December 22, 1998, May 4, 1999,
and May 5, 1999,

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

g. Snubber Service Life Monitoring Program

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained. ~~as required by Specification 6.10.3m.~~

Concurrent with the first inservice visual inspection and during refueling shutdown thereafter, the installation and maintenance records for each safety related snubber as identified by site records shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This re-evaluation, replacement or reconditioning shall be indicated in the records.