



FPL

JUN 21 2000

L-2000-122

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
Request for Modification of Confirmatory Order Re: Containment
Hydrogen Monitors (NUREG-0737, Item II.F.1, Attachment 6)

Florida Power & Light Company, (FPL), requests a modification of the Turkey Point Units 3 and 4 Confirmatory Order dated March 14, 1983, that imposed the requirement to provide continuous indication of hydrogen concentration in Turkey Point Units 3 and 4 containment following severe accidents. This requirement was contained in Attachment 6 to Item II.F.1 in NUREG-0737, "Clarification of TMI Action Plan Requirements." FPL requests relief from the requirement of establishing monitoring of hydrogen concentration in the containment within 30 minutes of the initiation of safety injection, and proposes that in lieu of the current 30-minute time limit, risk-informed insights be used to determine the functional requirements for monitoring of containment hydrogen concentration that would allow extending the monitoring requirement time limit to more than 30 minutes following initiation of safety injection.

The basis for this request is that for a design basis event, allocating resources to place the hydrogen monitor in service early in the event may be inappropriate and may not be in the best interests of overall plant safety.

At Turkey Point Units 3 and 4, the Post Accident Hydrogen Monitoring System (PAHMS) provides indication and recording of the hydrogen concentration in the containment. The PAHMS operates in standby during normal plant operation and must be initiated manually following an accident to monitor hydrogen levels inside the containment during accident conditions. The system consists of a primary and backup monitor for each unit. To control containment hydrogen levels, provisions are in place for an external hydrogen recombiner to be operational within 12 days of a design basis accident.

The primary function of the hydrogen monitoring system at Turkey Point Units 3 and 4, is to identify when it is appropriate to startup the hydrogen recombiners during design basis accidents based on the containment hydrogen concentration.

For design basis accidents the potential need for actuation of the hydrogen recombiners does not occur for 12 days. For severe accidents, which are beyond design basis events, there are no additional operator actions that would rely on information from the hydrogen monitoring system. While the hydrogen monitoring system provides useful information for longer-term post-accident core damage assessment, the system is not utilized to initiate any mitigating actions in the early stages of an accident. Other parameters are used to initiate operator actions to mitigate core damage; therefore, use of the hydrogen monitoring system in the early stages of an accident would not be very useful.

Although it has been demonstrated in simulator training that the operators would be able to startup the hydrogen monitoring within the current 30-minute time limit, in practicality, it would not be one of the shift crew's most immediate concerns during a design basis accident. The more immediate actions required of the operating crews are to assure that safety systems are functioning properly and critical safety functions are being accomplished in response to an accident. Due to the critical nature of the post-accident shift crew activities, the operational resources should not be directed to perform lower-priority activities, such as placing the hydrogen monitor in service. Therefore, it is appropriate to delay the operator actions necessary to initiate hydrogen monitoring until the accident assessment and mitigation actions are complete. The additional time would allow the operators to complete their initial accident assessment and mitigation duties before redirecting their attention to the relatively longer-term recovery actions.

Extending the current 30-minute requirement will also have no adverse impact on implementation of the emergency plan or emergency operating procedures. Other indications such as core exit thermocouples, reactor coolant system pressure and temperature, containment radiation monitoring, containment pressure and temperature, reactor vessel level, and excore detectors are readily available without operator action for use in recognizing and classifying emergencies and issuing protective action recommendations to offsite authorities.

Granting FPL the flexibility and responsibility for determining the appropriate time limit for establishing monitoring of containment hydrogen concentration will preclude control room personnel from being distracted from important tasks in the early phases of accident mitigation, while allowing other cognizant personnel to be aware of hydrogen concentration based on a risk-informed functional assessment at a reasonable time following an accident. This will have a positive impact on the ability of the operators to concentrate on their more immediate actions while having no negative impact on the longer-term actions. Therefore, modification of the Confirmatory Order will result in an improvement in public health and safety.

This request is consistent with similar requests made by Duke Energy Corporation for Oconee Nuclear Station, Units 1, 2, and 3 (Oconee), and Entergy Operations for Arkansas Nuclear One (ANO), Units 1 and 2.

The NRC granted these requests by providing a Confirmatory Order modifying the post-TMI requirement pertaining to containment hydrogen monitors for Oconee and ANO by letters dated November 29, 1999, and September 28, 1998, respectively. FPL's commitment made in response to TMI Action Plan Item II.F.1, Attachment 6, is similar to those made for Oconee and ANO.

Therefore, FPL proposes that the Confirmatory Order requirement be modified to state the following:

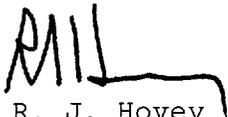
"The licensee may elect to either maintain the 30-minute time limit for monitoring of hydrogen in containment, as described by TMI Action Plan Item II.F.1, Attachment 6, in NUREG-0737, and required by the Confirmatory Order of March 14, 1983, or modify the time limit in the manner specified in the functional requirement described below:

Procedures shall be established for ensuring that monitoring of hydrogen concentration in the containment atmosphere is available in a sufficiently timely manner to support the implementation of the Turkey Point Units 3 and 4 Emergency Plan (and related procedures) and related activities such as guidance for severe accident management. Hydrogen monitoring will be initiated based on: (1) the appropriate priority for establishing monitoring of hydrogen concentration within the containment in relation to other activities in the control room; (2) the use of the monitoring of hydrogen concentration by decision makers for severe accident management and emergency response; and (3) insights from experience or evaluation pertaining to possible scenarios that result in significant generation of hydrogen that would be indicative of core damage or a potential threat to the integrity of the containment building. Affected licensing basis documents and other related documents will be appropriately revised and/or updated in accordance with applicable NRC regulations."

There are no new commitments made in this submittal. Upon modification of the Confirmatory Order, FPL will operate and maintain the containment hydrogen monitors for Turkey Point Units 3 and 4 in accordance with the applicable functional requirements described above.

Should you have any questions, please contact us.

Very truly yours,



R. J. Hovey
Vice President
Turkey Point Plant

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GSS

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

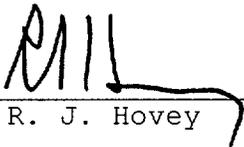
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STATE OF FLORIDA)
) ss.
COUNTY OF MIAMI-DADE)

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
21st day of June, 2000.

CHERYL A. STEVENSON
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # CC929876
EXPIRES 6/19/2004
BONDED THRU A&A 1-888-NOTARY1

Cheryl A. Stevenson

Name of Notary Public (Type or Print)

R. J. Hovey is personally known to me.