



FPL

DEC 06 2000

L-2000-235
10 CFR 50.90
10 CFR 50.91
10 CFR 50.92

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
Containment Air Lock Interlock Surveillance Frequency, And
Correction to Table 3.3-2, Item 1.e

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify the Turkey Point Units 3 and 4 Technical Specification (TS) Section 4.6.1.3, Containment Air Locks; Surveillance Requirements (SR). Specifically, FPL requests to revise SR 4.6.1.3.c., to require testing of the air lock door interlock at an interval of 24 months.

Presently SR 4.6.1.3.c is performed "at least once every six months," and is therefore done with the unit on line. Thus the existing SR (1) is not consistent with ALARA principles in that it involves some risk of dose to workers; (2) must be performed in a Mode in which the interlock is required to be operable to ensure containment integrity; and (3) must be performed more frequently than the overall air lock leakage test, despite the interlock having no degradable components, such as seals.

These amendments would allow the SR frequency to coincide with the frequency of the overall air lock SR frequency. SR 4.6.1.3.b requires the overall air lock leakage test to be conducted "in accordance with the Containment Leakage Rate Testing Program." Technical Specification 6.8.4.h requires that program to be established as required by 10 CFR 50 Appendix J Option B, and in accordance with Regulatory Guide 1.163. These documents allow for an extension of the overall airlock leakage test interval to a maximum of 30 months. In this fashion the interlock can be tested in a Mode where the interlock is not required.

These amendments are consistent with that proposed by the Nuclear Energy Institute's Technical Specification Task Force as TSTF-17, and approved by the NRC for incorporation into the Improved Standardized Technical Specifications on March 13, 1997.

Additionally, FPL requests to amend Technical Specification 3.3.2, Table 3.3-2, Item 1.e. Specifically, FPL requests to change the applicable Modes for Item 1.e from 1,2,3* to 1,2,3#. The existing asterisk is a typographical error that refers to an incorrect note. The correct note is referenced by the pound sign.

A description of the proposed license amendments is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR 50.92. The no significant hazards consideration determination and environmental consideration in support of the proposed Technical Specification changes are provided in Attachment 2. Attachment 3 provides marked up pages for the proposed changes to the Technical Specifications.

The proposed license amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board. In accordance with 10 CFR 50.91(b), a copy of the proposed license amendments is being forwarded to the State Designee for the State of Florida. FPL requests that these amendments, if approved, be issued by May, 2001.

Should there be any questions, please contact us.

Very truly yours,



R. J. Hovey
Vice President
Turkey Point Plant

CLM

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
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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

6th day of December, 2000.

Cheryl A. Stevenson

Name of Notary Public (Type or Print)

CHERYL A. STEVENSON
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # CC822676
EXPIRES 6/19/2004
BONDED THRU ASA 1-688-NOTARY1

R. J. Hovey is personally known to me.

DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

1.0 Introduction

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify the Turkey Point Units 3 and 4 Technical Specification (TS) 4.6.1.3.c, to require the performance of the air lock interlock test once every 24 months instead of once every 6 months.

2.0 Background

Historically, the air lock interlock verification has had its frequency chosen to coincide with that of the overall airlock leakage test. According to 10 CFR 50, Appendix J, Option A, this frequency is once per 6 months. However, 10 CFR 50, Appendix J, Option B allows for an extension of the overall air lock leakage test interval to a maximum of 30 months, based on previous acceptable performance.

Turkey Point's Technical Specifications were amended in January, 1997, to use 10 CFR 50 Appendix J, Option B. As a result, the three surveillance requirements for the air locks are:

- a. a vacuum test after each closing
- b. an overall leakage test (at least every 30 months)
- c. an interlock test every 6 months.

The amendments proposed herein would allow the surveillance frequencies of the overall leakage test and the interlock test to be realigned with each other, such that each must be performed within a maximum of 30 months.

3.0 System Description

Each containment at Turkey Point has two air locks, commonly named the personnel air lock, and the escape hatch. Each air lock has an inner and an outer door. Interlocks prevent both doors in the air lock from being opened at the same time, thereby preserving containment integrity. These interlocks are completely mechanical, and contain no degradable components. During refueling outages the interlocks are typically defeated (by removing linkages) to allow both doors to be opened, as allowed by TS 3.9.4.b. Therefore, although the proposed amendments would allow a testing interval of up to 30 months (with grace), as a practical matter, FPL expects to perform the interlock surveillance at the end of each refueling outage. This surveillance will ensure operability of the interlock prior to entering Mode 4 as required by TS 4.0.4.

4.0 Proposed Technical Specification Changes

1. Changes to Surveillance Requirement (SR) 4.6.1.3.c:

The current SR 4.6.1.3.c reads as follows:

"(Each containment air lock shall be demonstrated operable:)

- c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time."

FPL proposes to revise SR 4.6.1.3.c to read:

"(Each containment air lock shall be demonstrated operable:)

- c. At least once per 24 months by verifying that only one door in each air lock can be opened at a time."

Justification:

The existing SR (1) is not consistent with ALARA principles in that it involves some risk of dose to workers (as a result of being performed at power); (2) must be performed in a mode in which the interlock is required to be operable to ensure containment integrity; and (3) must be performed more frequently than the overall air lock leakage test, despite the interlock having no degradable components, such as seals.

The door interlock cannot be readily bypassed; linkages must be removed which are under the control of Turkey Point procedures such as temporary system alterations, containment closure procedures, and equipment out of service.

FPL's policy is to not unnecessarily challenge interlocks; in keeping with that policy, Turkey Point's procedures and training do not allow this interlock to be challenged for ingress and egress. One door is opened, all personnel and equipment as necessary are placed inside the air lock, and then the door is completely closed prior to attempting to open the second door. Testing of the air lock interlock mechanism is accomplished by having one door not completely engaged in the closed position, while attempting to open the second door. Failure of this SR effectively results in a loss of containment integrity. Performance of this SR every six months while the unit is operating is contrary to processes and training for conservative operation, in that it challenges an interlock in a mode of operation when the interlock is required.

Turkey Point's containment isolation barriers are described in Section 6.6.2.1 of the Updated Final Safety Analysis Report (UFSAR). Regarding the personnel access and emergency escape airlocks, the section states, "Mechanical interlocks have been provided to assure that one door is closed at all times when containment integrity is required." Technical Specification 3.6.1.1 requires containment integrity in Modes 1-4. UFSAR Section 14.3.5 describes the environmental consequences of a Loss of Coolant Accident, with an assumed containment leak rate of 0.25% of weight of containment air for the first 24 hours (0.125% thereafter). The resulting offsite and control room doses are given in UFSAR Table 14.3.5-5. Relaxing the surveillance interval for the containment airlock interlock will not impact these dose consequences.

These amendments are consistent with that proposed by the Nuclear Energy Institute's Technical Specification Task Force as TSTF-17, and approved by the NRC for incorporation into the Improved Standardized Technical Specifications on March 13, 1997.

2. Changes to TS Table 3.3-2, Item 1.e Mode Applicability

Turkey Point Units 3 and 4 Technical Specifications Table 3.3-2, "Engineered Safety Features Actuation System Instrumentation," Loss of Power, Item 1.e addresses the requirements for the Safety Injection (SI) signal generated by high steamline differential pressure. Table 3.3-2, Item 1.e Mode Applicability currently reads:

"1 2 3*"

FPL proposes to change the Functional Unit description to read:

"1 2 3#"

Justification

The proposed change corrects a typographical error, and is requested to make the Mode Applicability consistent with the design of the protection logic. The present asterisk indicates that this SI signal may be blocked below the Tavg--Low Interlock Setpoint, when in fact the Block Permissive for this signal is pressurizer pressure below 2000 psi (indicated by a pound sign #, as shown for line item 1.d).

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

The purpose of the proposed license amendments is to revise the current requirements of Turkey Point Units 3 and 4 Technical Specification (TS) 4.6.1.3.c, to require the performance of the air lock interlock test once every 24 months instead of once every 6 months. In addition, an administrative change to Item 1.e. of Table 3.3-2, is proposed, to correct a typographical error.

Introduction

The Nuclear Regulatory Commission has provided standards for determining whether a significant safety 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 changes allow performance of the required surveillance at the same frequency as the performance of the air lock overall leakage surveillance. The proposed relaxation in surveillance frequency will not impact the initiating event for any previously evaluated accident. The correction of the typographical error has no impact on any accident analysis. The proposed changes do not affect any of the assumptions made or methodologies used, for any accident analysis. Thus the proposed changes have no impact on any of the accident probabilities or consequences. Therefore, the proposed amendments do not involve a significant increase in the probability or consequences of any accident previously evaluated.

- (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 previously evaluated.

The proposed changes do not alter the design, physical configuration, or modes of operation of the plant. No changes are being made to the plant that would introduce any new accident causal mechanisms. The proposed Technical Specification changes do not impact any other plant systems. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed changes do not change the operation, function, or modes of plant or equipment operation. The proposed changes do not change the level of assurance of containment integrity. Plant processes and training preclude challenges to the air lock interlocks. The correction of the typographical error has no impact on any margin of safety. Therefore, operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

Summary

Based on the discussion presented above, FPL has concluded that the proposed license amendments do not involve a significant safety hazards consideration.

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 Technical Specifications to allow performance of the required Technical Specification surveillance less frequently. The proposed amendments will have no effect on the probability or consequences of accidents previously evaluated. In addition, the proposed amendments do not create the possibility of a new or different kind of accident than any accident previously evaluated. Therefore, 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 reviewed these proposed license amendments and 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). Therefore, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment is not required in connection with issuance of the amendments.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION PAGES

3/4 6-5
3/4 3-14

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

- a. Following each closing, at the frequency specified in the Containment Leakage Rate Testing Program, by verifying that the seals have not been damaged and have seated properly by vacuum testing the volume between the door seals in accordance with approved plant procedures.
- b. By conducting overall air lock leakage tests in accordance with the Containment Leakage Rate Testing Program.
- c. At least once per ²⁴5 months by verifying that only one door in each air lock can be opened at a time.

TABLE 3.3-2
ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
1. Safety Injection (Reactor Trip, Turbine Trip, Feedwater Isolation, Control Room Ventilation Isolation, Start Diesel Generators, Containment Phase A Isolation (except Manual SI), Containment Cooling Fans, Containment Filter Fans, Start Sequencer, Component Cooling Water, Start Auxiliary Feedwater and Intake Cooling Water).					
a. Manual Initiation	2	1	2	1, 2, 3, 4	17
b. Automatic Actuation Logic and Actuation Relays	2	1	2	1, 2, 3, 4	14
c. Containment Pressure-High	3	2	2	1, 2, 3	15
d. Pressurizer Pressure - Low	3	2	2	1, 2, 3#	15
e. High Differential Pressure Between the Steam Line Header and any Steam Line	3/steam line	2/steam line in any steam line	2/steam line	1, 2, 3*#	15