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OCT 14 1983

Docket Nos. 50-250
and 50-251

Dr. Robert E. Uhrig, Vice President
 Advanced Systems and Technology
 Florida Power and Light Company
 Post Office Box 14000
 Juno Beach, Florida 33408

Dear Dr. Uhrig:

The Commission has issued the enclosed Amendment No. 96 to Facility Operating License No. DPR-31 and Amendment No. 90 to Facility Operating License No. DPR-41 for the Turkey Point Plant Unit Nos. 3 and 4, respectively. The amendments consist of changes to the Technical Specifications in response to your application transmitted by letter dated May 14, 1981, supplemented on July 7, 1981, February 19, 1982, June 10, 1982 and August 19, 1983.

These amendments add requirements for visual inspections and periodic testing of mechanical snubbers to ensure operability and capability to perform their safety-related function.

A copy of the Safety Evaluation is enclosed. A Notice of Issuance will be included in the Commission's next regular Federal Register notice.

Sincerely,

Daniel G. McDonald, Jr., Project Manager
 Operating Reactors Branch No. 1
 Division of Licensing

Enclosures:

1. Amendment No. 96 to DPR-31
2. Amendment No. 90 to DPR-41
3. Safety Evaluation

cc w/enclosures:
 See next page

Immediately before issuing check for retention of license to T. Young
[Signature]

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 PDR ADOCK 05000250
 P PDR

OFFICE	ORB 1 CParrish	ORB DMcDonald/rs	ORBOY SYoung	AD:DA:DL GLairas	OELD M. Young	D:DL DEisenhut
SURNAME						
DATE	9/30/83	9/30/83	10/3/83	10/3/83	10/5/83	10/ /83

Robert E. Uhrig
Florida Power and Light Company

cc: Harold F. Reis, Esquire
Lowenstein, Newman, Reis and Axelrad
1025 Connecticut Avenue, N.W.
Suite 1214
Washington, D. C. 20036

Bureau of Intergovernmental Relations
660 Apalachee Parkway
Tallahassee, Florida 33130

Norman A. Coll, Esquire
Steel, Hector and Davis
1400 Southeast First National
Bank Building
Miami, Florida 33131

Mr. Henry Yaeger, Plant Manager
Turkey Point Plant
Florida Power and Light Company
P. O. Box 013100
Miami, Florida 33101

Mr. M. R. Stierheim
County Manager of Metropolitan
Dade County
Miami, Florida 33130

Resident Inspector
Turkey Point Nuclear Generating Station
U. S. Nuclear Regulatory Commission
Post Office Box 1207
Homestead, Florida 33030

Regional Radiation Representative
EPA Region IV
345 Courtland Street, N.W.
Atlanta, Georgia 30308

Mr. Jack Shreve
Office of the Public Counsel
Room 4, Holland Building
Tallahassee, Florida 32304

Administrator
Department of Environmental
Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

James P. O'Reilly
Regional Administrator - Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street - Suite 3100
Atlanta, Georgia 30303



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

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 96
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 May 14, 1981, supplemented on July 7, 1981, February 19, 1982, June 10, 1982, and August 19, 1983, 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

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 96, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 14, 1983



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

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 90
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 May 14, 1981, supplemented on July 7, 1981, February 19, 1982, June 10, 1982, and August 19, 1983, 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

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 90, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Steven A. Yarga, Chief
Operating Reactors Branch #1
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: October 14, 1983

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 96 TO FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 90 TO FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

<u>Remove Pages</u>	<u>Insert Pages</u>
ii	ii
iii	iii
iv	iv
3.13-1	3.13-1
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4.14-1 and -2	4.14-1 through 4
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3.13 SNUBBERS

Applicability: Applies to the operational status of safety-related snubbers.

Objective: To define the LIMITING CONDITIONS FOR OPERATION applied to the OPERABILITY of safety-related snubbers.

- Specification:
1. During all modes of operation except COLD SHUTDOWN and REFUELING SHUTDOWN, all safety-related snubbers listed in Table 3.13-1 shall be OPERABLE except as noted in 3.13.2 and 3.13.3.
 2. During COLD SHUTDOWN and REFUELING SHUTDOWN, all safety-related snubbers listed in Table 3.13-1 located on systems required to be OPERABLE, shall be OPERABLE except as noted in 3.13.3.
 3. With one or more safety-related snubber(s) inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an evaluation per T.S. 4.14.3 on the supported component(s) or declare the supported system inoperable and follow the appropriate specifications for that system.
 4. Snubbers may be added to or removed from SAFETY RELATED SYSTEMS without prior License Amendment to Table 3.13-1 provided that a revision to Table 3.13-1 is included with the next License Amendment request.

TABLE 3.13-1 SHEET 1

SAFETY RELATED SNUBBERS - UNIT 3

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1	Charging	14	X		X	
2	Pressurizer Spray	14	X		X	
3	Pressurizer Spray	14	X		X	
4	Pressurizer Spray	14	X		X	
5	Pressurizer Spray	14	X		X	
6	Pressurizer Spray	14	X		X	
7	Pressurizer Spray	14	X		X	
8	Pressurizer Spray	14	X		X	
9	Pressurizer Spray	14	X		X	
10	Pressurizer Spray	14	X		X	
11	Pressurizer Spray	14	X		X	
12	Pressurizer Spray	14	X		X	
13	Pressurizer Spray	14	X		X	
14	Pressurizer Relief	74½	X		X	
15	Pressurizer Relief	74½	X		X	
16	Pressurizer Relief	74½	X		X	
17	Pressurizer Relief	73	X		X	
18	Pressurizer Spray	73	X		X	
19	Pressurizer Spray	73	X		X	
20	Pressurizer Spray	73	X		X	
21	Pressurizer Spray	73	X		X	
22	Pressurizer Spray	73	X		X	
23	Pressurizer Spray	73	X		X	
24	Pressurizer Relief	73	X		X	

TABLE 3.13-1 SHEET 2

SAFETY RELATED SNUBBERS - UNIT 3

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
25	Pressurizer Relief	73	X		X	
26	Pressurizer Spray	73	X		X	
27	Pressurizer Spray	73	X		X	
28	Pressurizer Spray	73	X		X	
29	Pressurizer Spray	73	X		X	
30	Pressurizer Relief	73	X		X	
31	Pressurizer Relief	73	X		X	
32	3A S/G Blowdown in Cubicle	32			X	
33	3A S/G Blowdown in Cubicle	32			X	
34	3A S/G Blowdown in Cubicle	32			X	
35	3C S/G Blowdown in Cubicle	33			X	
36	3C S/G Blowdown in Cubicle	33			X	
37	3C S/G Blowdown in Cubicle	21			X	
38	Residual Heat Removal	2	X			X
39	Residual Heat Removal	2	X			X
40	Residual Heat Removal	2	X			X
41	Residual Heat Removal	2	X			X
42	Safety Injection	12	X			X
43	Residual Heat Removal	12				X
44	Safety Injection	12				X
45	Safety Injection	12				X
46	Steam to Aux. Feedwater	26				X
47	Steam to Aux. Feedwater	26				X
48	Steam to Aux. Feedwater	26				X

TABLE 3.13-1 SHEET 3

SAFETY RELATED SNUBBERS - UNIT 3

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
49	Steam to Aux. Feedwater	30½				X
50	Main Steam	32				X
51	Main Steam	32				X
60	Main Steam	32				X
61	Main Steam	32				X
75	Main Steam	32				X
76	Main Steam	32				X
77	Main Steam	32				X
78	Main Steam	32				X
79	Feedwater	58			X	
80	Feedwater	58			X	
81	Feedwater	56		X	X	
82	Feedwater	52		X	X	
83	Feedwater	52		X	X	
84	Feedwater	58			X	
85	Feedwater	55		X	X	
86	Feedwater	55		X	X	
87	Feedwater	56		X	X	
88	Feedwater	58			X	
89	Feedwater	56		X	X	
90	Feedwater	58			X	
91	Feedwater	55		X	X	
92	A RTD Loop Cold Leg	25	X		X	
93	A RTD Loop Hot Leg	27	X		X	
94	3C Mainsteam Line	59		X	X	

TABLE 3.13-1 SHEET 4

SAFETY RELATED SNUBBERS - UNIT 4

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
6	Feedwater	30			X	
7	Feedwater	30			X	
8	Pressurizer Spray	14	X		X	
9	Pressurizer Spray	14	X		X	
10	Pressurizer Spray	14	X		X	
11	Pressurizer Spray	14	X		X	
12	Pressurizer Spray	14	X		X	
13	Pressurizer Spray	14	X		X	
14	Pressurizer Spray	14	X		X	
15	Pressurizer Spray	14	X		X	
16	Pressurizer Spray	14	X		X	
17	Charging	14	X		X	
18	Feedwater	58			X	
19	Feedwater	58			X	
20	Feedwater	58			X	
21	Feedwater	58			X	
22	Feedwater	58			X	
23	Feedwater	58			X	
24	Pressurizer Relief	73	X		X	
25	Pressurizer Relief	73	X		X	
26	Pressurizer Relief	73	X		X	
27	Pressurizer Relief	73	X		X	
28	Pressurizer Relief	73	X		X	
29	Pressurizer Spray	73	X		X	

TABLE 3.13-1 SHEET 5

SAFETY RELATED SNUBBERS - UNIT 4

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
30	Pressurizer Spray	73	X		X	
31	Pressurizer Relief	73	X		X	
32	Pressurizer Relief	73	X		X	
34	Pressurizer Spray	73	X		X	
35	Pressurizer Spray	73	X		X	
36	Pressurizer Spray	73	X		X	
37	Pressurizer Spray	73	X		X	
38	Pressurizer Spray	73	X		X	
39	Pressurizer Spray	73	X		X	
40	Pressurizer Spray	73	X		X	
41	Pressurizer Spray	73	X		X	
42	Pressurizer Relief	73	X		X	
43	Pressurizer Spray	14	X		X	
44	Pressurizer Spray	14	X		X	
45	Pressurizer Spray	14	X		X	
46	Pressurizer Spray	14	X		X	
47	Pressurizer Spray	14	X		X	
48	Pressurizer Spray	14	X		X	
49	Residual Heat Removal	2	X			X
50	Residual Heat Removal	2	X			X
51	Residual Heat Removal	2	X			X
52	Residual Heat Removal	2	X			X
53	Residual Heat Removal	2	X			X
54	Safety Injection	12				X

TABLE 3.13-1 SHEET 6

SAFETY RELATED SNUBBERS - UNIT 4

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
55	Safety Injection	12				X
57	Main Steam	32				X
58	Main Steam	32				X
59	Main Steam	32				X
60	Main Steam	32				X
80	Feedwater	56		X	X	
81	Feedwater	56		X	X	
82	Feedwater	56		X	X	
83	Main Steam	32				X
84	Main Steam	32				X
85	Main Steam	32				X
86	Main Steam	32				X
87	"A" RTD Loop	25	X		X	
88	"A" RTD Loop	23	X		X	
89	"A" RTD Loop	26	X		X	
90	"C" RTD Loop	27	X		X	
91	"C" RTD Loop	29	X		X	
92	"B" RTD Loop	21	X		X	
93	"B" RTD Loop	27	X		X	
94	"B" RTD Loop	27	X		X	
95	"B" RTD Loop	27	X		X	
96	"B" RCP Seal Injection	24	X		X	
97	"A" RCP Seal Injection	28	X		X	
98	MSRV M.S. Platform	62				X

TABLE 3.13-1 SHEET 7

SAFETY RELATED SNUBBERS - UNIT 4

FPL TAG NO.	SYSTEM	APPROXIMATE ELEVATION (FEET)	SNUBBERS IN HIGH RADIATION AREAS DURING SHUTDOWN*	SNUBBERS ESPECIALLY DIFFICULT TO REMOVE	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
99	Aux Bldg: SIS Pump Room	27				X
100	Aux Bldg: SIS Pump Room	27				X
101	Aux Bldg: HCV 4-758	19	X		X	
102	Aux Bldg: FE 4-635	16	X		X	
103	Aux Bldg: FE 4-635	24	X		X	
104	"A" RCS Loop Near S.G.	34	X		X	
105	"A" S.G. Blowdown Line	33	X		X	
106	"B" S.G. Blowdown Line	34	X		X	
107	"B" S.G. Blowdown Line	34	X		X	
108	"C" S.G. Blowdown Line	21.5	X		X	
109	"C" S.G. Blowdown Line	23	X		X	
110	"C" S.G. Blowdown Line	33	X		X	
111	"C" S.G. Blowdown Line	40	X		X	
112	"C" S.G. Blowdown Line	40	X		X	
113	FW Recirc.	33				
114	Cond Storage Tank AFW Supply	28				X
115	Cond Storage Tank AFW Supply	28				X
117	"C" S.G. Blowdown Line	33	X		X	

* Modifications to this column due to changes in high radiation areas may be without prior License Amendment provided that a revision to Table 3.13-1 is included with the next License Amendment request.

4.14 SNUBBERS

Applicability: Applies to periodic surveillance of safety-related snubbers.

Objective: To verify OPERABILITY of safety-related snubbers listed in Table 3.13-1. by performance of the following augmented inservice inspection program.

Specification: 1. Visual Inspections

For each unit, the first inservice visual inspection of snubbers after approval of this amendment shall be performed during the next refueling and shall include all snubbers listed in Table 3.13-1. If less than two (2) snubbers are found inoperable during the first inservice visual inspection for each unit, the second inservice visual inspection shall be performed 12 months $\pm 25\%$ from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>Number Inoperable Snubbers per Inspection Period per Unit</u>	<u>Subsequent Visual Inspection Period*#</u>
0	18 months + 25%
1	12 months $\pm 25\%$
2	6 months $\pm 25\%$
3, 4	124 days $\pm 25\%$
5, 6, 7	62 days $\pm 25\%$
8 or more	31 days $\pm 25\%$

Those snubbers may be categorized into two groups: those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

* The inspection interval shall not be lengthened more than one step at a time.

The provisions of T.S. 4.0.1 are not applicable.

2. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.14.4.

3. Functional Tests

For each unit, at least once per 18 months during SHUTDOWN, a representative sample (10% of the snubbers for the respective unit listed in Table 3.13-1) shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.14.4, an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all these snubbers on that unit have been functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

- A. The first snubber supporting main RCS piping downstream of reactor vessel nozzles.
- B. Snubbers within 5 feet of heavy equipment (ex. valves, pumps, turbines, motors, etc.).
- C. Snubbers within 10 feet of the discharge from a safety relief

Snubbers identified in Table 3.13-1 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

If any snubber selected for functional testing either fails to activate or fails to move, i.e., frozen in place, the cause will be evaluated under the provisions of 10 CFR Part 21.

Should the results of the evaluation indicate that the failure was caused by either manufacturer or design deficiency, further action shall be taken, if needed, based on manufacturer or engineering recommendations.

For the snubber(s) found inoperable, an evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

* Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber OPERABILITY for all design conditions at either the completion of their fabrication or at a subsequent date.

4. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

- A. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have increased more than 50% since the last surveillance test.
- B. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
- C. Snubber release rate, where required, is within the specified range in compression or tension.

5. Snubber Service Life Monitoring

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 6.10.2.m.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber listed in Table 3.13-1 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 reevaluation, replacement or reconditioning shall be indicated in the records.

- i. Records of annual physical inventory verifying accountability of sources on record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of facility radiation and contamination surveys.
- d. Records of radiation exposure for all individuals entering radiation control areas.
- e. Records of gaseous and liquid radioactive material released to the environs.
- f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- g. Records of training and qualification for members of the plant staff for the duration of their employment.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities as required by Corporate Quality Assurance Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

- k. Records of meetings of the PNSC and the CNRB.
- l. Records for Environmental Qualification which are covered under the provisions of paragraph 6.13.
- m. Records of the service lives of all snubbers listed in Table 3.13-1 including the date at which the service life commences and associated installation and maintenance records.

6.11 **RADIATION PROTECTION PROGRAM**

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 **HIGH RADIATION AREA**

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20:

- a. Each High Radiation Area in which the intensity of radiation is greater than 100 mRem/hr but less than 1000 mRem/hr shall be barricaded and conspicuously posted as a High Radiation Area and entrance thereto shall be controlled by issuance of a Radiation Work Permit and any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. Each High Radiation Area in which the intensity of radiation is greater than 100 mRem/hr shall be subject to the provisions of 6.13.1(a) above, and in addition locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under administrative control.

B3.13 BASES FOR LIMITING CONDITIONS FOR OPERATION, SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other SAFETY RELATED SYSTEMS is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any SAFETY-RELATED SYSTEMS.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any SAFETY-RELATED SYSTEM or COMPONENT has been adversely affected by the inoperability of the snubber. The evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant SHUTDOWNS at 18 month intervals. Observed failure of these sample snubbers shall require functional testing of additional units.

In cases where the cause of failure has been identified, additional testing shall be based on manufacturer's or engineering recommendations. As applicable, this additional testing increases the probability of locating possible inoperable snubbers without testing 100% of the safety-related snubbers.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

B4.14 BASES FOR SNUBBERS

The bases for Specification 4.14 are the same as for Specification 3.13. Refer to T.S. B3.13.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 96 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 90 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT PLANT UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-351

Introduction

To reflect accumulated experience obtained from operating plants in the past several years the NRC revised the Standard Technical Specifications on the surveillance requirements for safety-related snubbers. On November 20, 1980, this document was transmitted to operating plants excluding those under SEP along with a request for submittal of appropriate license amendments to incorporate the requirements of this revision within 120 days. The same request was extended to SEP plants on March 23, 1981.

Florida Power and Light Company letter L-83-454, dated August 19, 1983, submitted proposed amendments to the Turkey Point Units 3 and 4 Facility Technical Specifications. The proposal consists of changes to the Inservice Surveillance Requirements for safety-related snubbers. These amendments consolidate all previous submittals (L-81-206, dated May 14, 1981 and L-82-244, dated June 10, 1982) regarding safety-related snubbers.

Discussion

Numerous discoveries of inoperative snubbers in the period of 1973 to 1975 resulted in their surveillance requirements in the Technical Specifications for operating reactor plants. However, several deficiencies were identified after the original requirements were in force for several years. These deficiencies are:

1. Mechanical snubbers were not included in these-requirements.
2. The rated capacity of snubbers was used as a limit to the inservice test requirement.
3. NRC approval was necessary for the acceptance of seal materials.
4. Inservice test requirements were not clearly defined.

5. In-place inservice testing was not permitted.

Since mechanical snubbers were not subject to any surveillance requirements, some licensees and permit holders believed that mechanical snubbers were preferred by NRC. Many plants used mechanical snubbers as original equipment and many others requested to replace their hydraulic snubbers with mechanical ones to simplify or avoid an inservice surveillance program. This is directly contradictory to NRC's intention, where for an unsurveyed mechanical snubber, the most likely failure is permanent lock-up. This failure mode can be harmful to the system during normal plant operations.

During the period of 1973-1975, when the first hydraulic snubber surveillance requirements in the Technical Specifications were drafted, a compromise was made to limit the testing of snubbers to those with rated capacity of not more than 50,000 lbs. This is because of the available capacity of the test equipment and the requirement to test some parameters at the snubber rated load. Since then, greater equipment capacity and better understanding of parametric correlation both developed. To maintain this arbitrary 50,000 lb. limit could mean an unnecessary compromise on plant safety.

The original hydraulic snubber problem started from leaking seals. Most seal materials of the 1973 vintage could not withstand the temperature and irradiation environments. Ethylene propylene was the first material that could offer a reasonable service life for those seals. In order to discourage the use of unproven material for those seals, the words "NRC approved material" were used in the Technical Specifications. Staff members were asked to approve different seal materials on many occasions. Consequently, since the basis for the approval was not defined, the development of better seal materials by the industry was actually discouraged.

The not-well-defined acceptance criteria in the earlier version of the testing requirements resulted in non-uniform interpretations and implementation. Acceptance Criteria were set individually at widely different ranges. Since the rationale of adopting a specific acceptance criteria was not clear, I&E inspectors found it impossible to make any necessary corrections. In some cases, snubbers were tested without reference to acceptance criteria.

Testing of snubbers was usually accomplished by removing snubbers from their installed positions, mounting them on a testing rig, conducting the test, removing them from rig, and reinstalling them to the working position. Many snubbers were damaged in the removing and reinstallation process. This defeated the purpose for conducting tests. Since methods and equipment have been developed to conduct in-place tests on snubbers, taking advantage of these developments could result in minimizing the damage to snubbers caused by removal and reinstallation plus time and cost savings to the plants.

From these short-comings it was concluded that the snubber surveillance requirements for the Technical Specifications should be revised.

Evaluation

The revised surveillance requirements correct these deficiencies in the following manner:

1. Mechanical snubbers are now included in the surveillance program.
2. No arbitrary snubber capacity is used as a limit to the inservice test requirements.
3. Seal material no longer requires NRC approval. A monitoring program shall be implemented to assure that snubbers are functioning within their service life.
4. Clearly defined inservice test requirements for snubbers shall be implemented.
5. In-place inservice testing shall be permitted.

The proposed amendments to Turkey Point Units 3 and 4 Technical Specifications surveillance requirements are in general agreement with the Inservice Surveillance Requirements for snubbers as stated in the Standard Technical Specifications with certain exceptions which are as follows:

- a. All surveillance requirements relating only to hydraulic snubbers have been deleted since hydraulic snubbers have been replaced with mechanical snubbers in both Turkey Point Units 3 and 4.
- b. STS Sections 4.7.9.b - The Standard Technical Specifications require that visual inspection shall verify, in those locations where snubbers movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up.

This requirement has been deleted from the Turkey Point Technical Specifications since the mechanical snubbers installed cannot be manually moved without disconnecting the snubbers from the pins.

- c. STS Section 4.7.9.c - The Standard Technical Specifications require that if any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested.

The licensee has substituted the following in place of the above: "Should the results of the evaluation indicate that the failure was caused by manufacturer or design deficiency, further action shall be taken if needed, based on manufacturer or engineering recommendations".

- d. STS Section 4.7.9.d - the Standard Technical Specifications require that for snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

The licensee has deleted this requirement since "snubbers specifically required to not displace" are not used in Turkey Point Units 3 and 4.

Summary

Based on our review and the details identified above we find the proposed amendments to Turkey Point Units 3 and 4 Technical Specifications address the safety concerns and are in conformance with the Standard Technical Specifications and are, therefore, acceptable.

Environmental Consideration

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

Conclusion

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Date: October 14, 1983