

May 6, 1986

Docket Nos. 50-250
and 50-251

Mr. C. O. Woody, Group Vice President
Nuclear Energy Department
Florida Power and Light Company
Post Office Box 14000
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Dear Mr. Woody:

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The Commission has issued the enclosed Amendment No. 116 to Facility Operating License No. DPR-31 and Amendment No. 110 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 in response to your application transmitted by letter dated November 21, 1985.

These amendments revise the Technical Specifications (TS) relating to snubbers. The list of snubbers has been deleted in accordance with the guidance provided in Generic Letter 84-13, "Technical Specifications for Snubbers." The TS have also been changed to modify the existing testing requirements for safety-related snubbers to define the snubber type, delete the test acceptance criteria regarding a 50% drag force increase, and add additional acceptance criteria for visual inspection and additional requirements for an engineering evaluation of functional test failures.

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

Sincerely,

/s/

Daniel G. McDonald, Jr., Project Manager
PWR Project Directorate #2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 116 to DPR-31
2. Amendment No. 110 to DPR-41
3. Safety Evaluation

cc w/enclosures:

See next page

LA-PAD#2
DM:Ter
4/25/86

DM:PAD#2
DMcDonald:hc
4/28/86

DM:PAD#2
Rubenstein
5/5/86

OELD
My Young
4/29/86

my w/led revision
to SE #1
amendment

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P PDR

Mr. C. O. Woody
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Turkey Point Plant

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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. 116
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 21, 1985, 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:


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(B) Technical Specifications

The Technical Specifications contained in Appendix A and B, as revised through Amendment No. 116, 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 issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Acting 
for Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 6, 1986



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. 110
License No. DPR-41

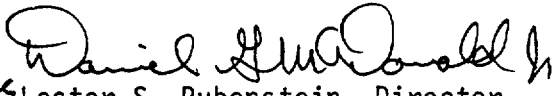
1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (the licensee) dated November 21, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's 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 Appendix A and B, as revised through Amendment No. 110, 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 issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Actg. #2 Lester S. Rubenstein, Director
PWR Project Directorate #2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 6, 1986

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 116 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 110 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NO. 50-250 AND 50-251

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Remove Pages

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3.13-1
4.14-1
4.14-2
4.14-3
4.14-4
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Table 3.13-1 Sheets 1, 2, 3, 3a,
3b, 4, 5, 6, 7,

Insert Pages

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v
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4.14-3
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6-29

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1.9 ACTION

ACTION shall be that part of a Technical Specification which prescribes remedial measures required under designated conditons.

1.10 CORE ALTERATION

CORE ALTERATION shall be the movement or manipulation of any component within the reactor pressure vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATION shall not preclude completion of movement of a component to a safe conservative position.

1.11 RATED POWER (R.P.)

Rated power is the licensed steady state reactor core thermal power output of 2200 MWt.

1.12 THERMAL POWER

Thermal power is the total core heat transferred from the fuel to the coolant.

1.13 DESIGN POWER

Design power is the steady state reactor thermal output of 2300 MWt.

SNUBBERS

3.13.1 All safety related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more safety related snubbers inoperable, within 72 hours:

- 1) replace or restore the inoperable snubber(s) to OPERABLE status AND
- 2) perform an evaluation per T.S. 4.14.1.e on the attached component(s) OR
- 3) declare the attached system inoperable and follow the appropriate ACTION statements for that system.

SNUBBERS

- 4.14.1 Each safety related snubber shall be demonstrated OPERABLE by performance of the following augmented in-service inspection program.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers may be categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers. If all snubbers of each type (on any system) are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection (of that system) shall be performed at the first refueling outage. Otherwise, subsequent visual inspections (of a given system) shall be performed in accordance with the following schedule:

<u>Number Inoperable Snubbers of Each Type (on any system) per Inspection Period per Unit</u>	<u>Subsequent Visual Inspection Period*#</u>
0	18 months \pm 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%

* The inspection interval for each type of snubber (on a given system) shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found (on that system).

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

c. 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, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage 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 4.14.1.f.

d. Functional Tests

For each unit, during refueling shutdown, a representative sample (10% of the total number of safety related snubbers for the respective unit identified by site records) shall be functionally tested either in place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.14.1.f, an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type 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 categories:

1. Snubbers within 5 feet of heavy equipment (ex. valves, pumps, turbines, motors, etc.).
2. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers identified by site records 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.

e. Functional Test Failure Analysis

An engineering evaluation shall be made of each failure to meet the functional test acceptance criteria to determine the cause of the failure. The results of this evaluation shall be used, if applicable, in selecting snubbers to be tested in an effort to determine the OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

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 to which the inoperable snubber(s) are attached. The purpose of this evaluation shall be to determine if the components to which the inoperable snubber(s) are attached were adversely affected by the inoperability of the snubber(s) in order to ensure that the 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 lift destructive testing was performed to qualify snubber OPERABILITY for all design conditions at either the completion of their fabrication or at a subsequent date.

f. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel.
2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
3. Snubber release rate, where required, is within the specified range in compression or tension.

g. 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 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 reevaluation, replacement or reconditioning shall be indicated in the records.

- 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 required by Specification 3.13 including the date of which the service life commences and associated installation and maintenance records.
- n. Annual Radiological Environmental Monitoring Reports and records of analyses transmitted to the licensee which are used to prepare the Annual Radiological Environmental Monitoring Report.

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 1000 mRem/hr shall be subject to the provisions of 6.12.1(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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 116 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 110 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

I. Introduction

In a letter from J. W. Williams to H. L. Thompson dated November 21, 1985, the licensee proposed to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 by modifying the Turkey Point, Units 3 and 4 Technical Specification (TS) testing requirements for safety related snubbers. The following are the staff's evaluation for each of the specific proposals. References to the STS below are for NUREG-0452, "Standard Technical Specifications for Westinghouse PWR's," Revision 5 (DRAFT).

II. Evaluation

A. Pages i and 1-4

PROPOSED CHANGE - The following definition of Action has been added to the Definitions Section of the T.S.: "Action shall be that part of a Technical Specification which prescribes remedial measures required under designated conditions."

STAFF EVALUATION - This proposed definition is identical to that in the STS and is therefore acceptable.

B. Pages v, 3.13-1, 4.14-1, 4.14-2, 4.14-3, 6-29 and Table 3.13-1

PROPOSED CHANGE - Delete Table 3.13-1, "Safety Related Snubbers" and all references to this table. This table provides a tabular listing of all safety related snubbers in each Unit.

STAFF EVALUATION - NRC Generic Letter 84-13, "Technical Specifications for Snubbers," dated May 3, 1984 provided the basis for licensees to delete this table. In accordance with the guidelines in 84-13, the licensee is requesting that this table be removed from the TS. Since there is no change in the TS specification of snubbers which are required to be tested, but merely a relocation of the listing from the TS to procedures controlled on the plant site, the staff finds this proposal to be acceptable.

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C. Page 4.14-1

PROPOSED CHANGE - The following definition of "type of snubber" has been added for clarity: "As used in this specification, type of snubbers shall mean snubbers of the same design and manufacturer, irrespective of capacity." The remainder of this section of the TS has been revised to provide this clarification.

STAFF EVALUATION - The current Turkey Point, Units 3 and 4 Technical Specifications require increased inspection (both number of tests and frequency of the testing) based upon the number of test failures. The proposed change makes it clear that this increased testing is required for snubbers of the type that are failing the tests. The staff has concluded that this change is justified and acceptable because there are substantial differences in the functional operation and dynamic response of snubbers to load, which are based on manufacturer and design. These differences are irrespective of capacity. Therefore, to evaluate possible generic design or manufacturing problems, snubber sample test increases due to visual and/or functional test failures should be selected based on the type of snubber. Additionally, this proposed change is consistent with the text of the STS.

D. Page 4.14-2

PROPOSED CHANGE - In section 4.14.1.c, an additional requirement for visual inspection acceptance criteria has been added. This change adds the requirement to verify that the fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. The requirement to include the first snubber supporting main reactor coolant system (RCS) piping downstream of the reactor vessel nozzles has been removed because no snubbers exist on RCS piping and there are no plans to install any snubbers there in the future.

STAFF EVALUATION - Since the additional requirement for visual acceptance criteria provides a more conservative surveillance requirement and is consistent with the STS, the staff concludes that this proposed change is acceptable.

The deletion of the requirement to include the RCS snubber results in a TS which is consistent with the actual plant configuration and is therefore acceptable.

E. Pages 4.14-3 and 4.14-4

PROPOSED CHANGE - The functional tests section has been split into two sections with the new section being 4.14.1.e, titled "Functional Test Failure Analysis." This new section was added to separate the analyses that are done for functional test results from the the functional test section. No existing requirements were deleted. A requirement for an engineering evaluation for each failure to meet functional test acceptance criteria to determine the cause of the failure has been added. This adds an additional limitation, restriction or control not presently included in the TS.

STAFF EVALUATION - Since this proposed change provides an additional requirement to the current Turkey Point, Units 3 and 4 TS and results in a new section entitled "Functional Test Failures Analysis" which is consistent with the STS, the staff concludes that it is acceptable.

F. Page 4.14-4

PROPOSED CHANGE - Section 4.14-1.f.1 has been revised to read, "The mechanical snubber functional test shall verify that the force required to initiate or maintain motion of the snubber is within the specified range in both directions of travel."

STAFF EVALUATION - The specified range of the drag force is supplied by each snubber vendor and therefore should not be quantified in the TS. This proposed change will result in a TS section which is consistent with the STS and is therefore acceptable.

III. Findings

Based on the above evaluations, the staff has concluded that the proposed Technical Specification changes are in accordance with the guidance provided in Generic Letter 84-13, "Technical Specifications for Snubbers"; will assure acceptable testing; provides additional acceptance criteria to assure the operability of the safety-related snubbers; and, therefore, are acceptable.

IV. Environmental Consideration

These amendments involve changes in the installation or use of the facilities components located within the restricted areas as defined in 10 CFR 20 and changes in surveillance requirements. The staff has determined that these 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR Sec 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 these amendments.

V. 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 these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: May 6, 1986

Principal Contributor:

H. Brammer