

April 8, 1988

Docket Nos. 50-250
and 50-251

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Mr. W. F. Conway
Acting Group Vice President
Nuclear Energy
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408

Dear Mr. Conway:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - TECHNICAL SPECIFICATION CHANGE
REQUEST RELATING TO COMPONENT COOLING WATER HEAT EXCHANGERS

Enclosed is a copy of a "Notice of Consideration of Issuance of Amendments to Facility Operating Licenses and Proposed No Significant Hazards Consideration Determination and Opportunity for a Hearing" for your information. This notice relates to your request dated April 4, 1988. The request was to revise the Technical Specifications relating to the component cooling water heat exchangers for Turkey Point Units 3 and 4.

The notice has been forwarded to the Office of Federal Register for publication.

Sincerely,

/s/

Gordon E. Edison, Sr. Project Manager
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

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Mr. W. F. Conway
Florida Power and Light Company

Turkey Point Plant

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UNITED STATES NUCLEAR REGULATORY COMMISSIONFLORIDA POWER AND LIGHT COMPANYDOCKET NOS. 50-250 AND 251NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO
FACILITY OPERATING LICENSES AND PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendments to Facility Operating License Nos. DPR-31 and DPR-41, issued to the Florida Power and Light Company (the licensee), for operation of the Turkey Point Plant, Units 3 and 4, located in Dade County, Florida.

The amendments would revise Technical Specification (TS) 3.4.4 to (1) require applicability in Modes 1, 2, 3, and 4, (2) allow one Component Cooling Water (CCW) heat exchanger to be out of service for 72 hours instead of the current 24 hours, (3) revise the action requirements to be consistent with the operational modes specified in Table 1.1 of the TS, and (4) reduce the time allowed to go from hot standby to cold shutdown to be consistent with the Standard TS. In addition, the format would be revised to be consistent with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors (STS).

By letter dated April 4, 1988, the licensee proposed processing the amendments on an emergency basis. While the justification provided in the April 4, 1988 letter did not meet the requirements in 10 CFR 50.91(a)(5) for an emergency amendment, the Commission finds that exigent circumstances exist (see 10 CFR 50.91(a)(6)) based on the justification provided below.

As described in the licensee's letter dated November 18, 1987, Florida Power and Light (FPL) has modified the Unit 3 CCW heat exchangers to provide an on-line mechanical tube cleaning capability. FPL had planned to modify the Unit 4 heat exchangers during the Unit 4 refueling outage scheduled for late 1988 or early 1989. FPL would like to implement those modifications on Unit 4 prior to the coming summer months to ensure acceptable heat exchanger performance without the need for extensive repetitive heat exchanger cleaning. Installation of the tube cleaning system is expected to be accomplished under the provisions of 10 CFR 50.59.

Based on their experience with the CCW heat exchangers during the summer of 1987, FPL has determined that the best course of action is to install the continuous tube cleaning system on Unit 4 before this summer. FPL indicates this installation process will require a 72-hour period with a heat exchanger out of service for installation of a spool piece prior to putting the heat exchanger back in service. After approximately a 2-month period for system construction, additional 72-hour out-of-service periods will be required to put the system into operation.

According to FPL, if this work can start by April 15, 1988, the final out-of-service period of the installation would fall in mid-June. For this schedule to be successful, the remaining two inservice heat exchangers must be cleaned sufficiently to ensure that design basis heat loads can be carried for the out-of-service period. The time required to process a regular TS amendment request would drive the final out-of-service period for installation into mid-July or later. The licensee cannot ensure that the two inservice heat exchangers could support installation during time period based on their estimate of cooling canal temperatures. This would require shutdown of the unit to install the system.

Installation of the system during the April-June time frame will also allow completion of the optimization testing before next summer.

Before issuance of the proposed license amendments, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

The Commission has made a proposed determination that the amendment request involves no significant hazards considerations. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendments 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.

The licensee has provided an analysis to address the no significant hazards considerations. The relevant text of the licensee's analysis follows:

Operation of Turkey Point Units 3 and 4 in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change introduces no new mode of operation nor does it involve a physical modification to the plant. The proposed increase in allowed out of service time would not invalidate the assumptions used in the accident analysis regarding CCW system capability, or affect the ability of the two operable heat exchangers to remove 100 percent of the design basis accident heat loads. CCW heat exchanger operability is determined by a surveillance program which considers a number of factors including flow rates, intake cooling water inlet temperature, and heat exchanger tube cleanliness. The probability of a passive failure of one of the two operable heat exchangers during the 72 hours one heat exchanger is out of service is sufficiently small that operation with the heat exchanger out of service will not involve a significant increase in the probability or consequences of an accident previously analyzed.
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated, since no new mode of operation or physical modification to the plant is involved in this specific change.

- (3) Involve a significant reduction in a margin of safety. The basis for the TS states that one pump and two heat exchangers meet the requirements of the safety analysis. With one heat exchanger out of service, the two operable heat exchangers are capable of removing the design basis accident heat loads. CCW heat exchanger operability is determined by a surveillance program which considers a number of factors including flow rates, intake cooling water inlet temperature, and heat exchanger tube cleanliness.

In addition, the Commission has provided guidance for the application of the criteria in 10 CFR 50.92 specified above by providing examples of changes that are not likely to involve a significant hazards consideration (51 FR 7751).

Example (i): A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

Example (ii): A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement.

The reformatting to be consistent with the STS is an administrative change and is similar to example (i). The requirement that the CCW system be operable in Modes 1 through 4, and the revised action statements are more restrictive requirements, and are similar to example (ii).

Therefore, operation of the facility in accordance with the proposed amendment[s] would pose no threat to the public health and safety, and would not involve a significant hazards consideration.

The staff agrees with the licensee's conclusion that the amendment request involves no significant hazards considerations for the following reasons:

- (1) The specification of applicable modes is more restrictive than the current TS which does not specify modes. The applicable modes proposed include all operating modes when the reactor core is critical and when the reactor coolant temperature is greater than 200°F; i.e., the operating modes in which the CCW heat exchanger has most significance for reactor safety.

- (2) The relaxation of permissible outage time for one CCW heat exchanger from the current 24 hours to the proposed 72 hours is insignificant to safety. Only two heat exchangers are required to meet the design basis heat removal requirement. Each Turkey Point Unit has three heat exchangers. Should the two operating heat exchangers show degraded performance while the third heat exchanger is out of service, this can be accommodated by reducing power and shutting the plant down. Operational experience in the industry with heat exchangers, which are considered passive components, shows they rarely, if ever, fail catastrophically in a way that would threaten safety, but instead their usual failure modes are gradual degradation of heat removal surfaces due to silt or chemicals in the coolant, or small random leaks in individual tubes. In a meeting summary on this subject, dated March 29, 1988, the staff indicated no requirement is necessary for allowed outage time for the third CCW heat exchanger at Turkey Point Units 3 and 4.
- (3) Revision of the action requirements to be consistent with applicable modes is an administrative change with no safety significance.
- (4) Reduction of the time to go to cold shutdown is a more restrictive requirement and should enhance safety slightly.
- (5) Reformatting to be consistent with Standard TS is a safety improvement because the current Standard TS have improved organization and logic in their structure compared to the older (and current) Turkey Point TS.

Accordingly, the Commission proposes to determine that this change does not involve significant hazards considerations.

The Commission is seeking public comments on this proposed determination. Any comments received within 15 days after the date of publication of this notice will be considered in making any final determination. The Commission will not normally make a final determination unless it receives a request for a hearing.

Written comments may be submitted by mail to the Rules and Procedures Branch, Division of Rules and Records, Office of Administration and Resources Management, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, and should cite the publication date and page number of the FEDERAL REGISTER notice.

Written comments may also be delivered to Room 4000, Maryland National Bank Building, 7735 Old Georgetown Road, Bethesda, Maryland from 8:15 a.m. to 5:00 p.m. Copies of written comments received may be examined at the NRC Public Document Room, 1717 H Street, NW, Washington, D.C. The filing of requests for hearing and petitions for leave to intervene is discussed below.

By May 13, 1988, the licensee may file a request for a hearing with respect to issuance of the amendments to the subject facility operating licenses and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for hearing and a petition for leave to intervene. Requests for a hearing and petitions for leave to intervene shall be filed in accordance with the Commission's "Rule of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition; and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first pre-hearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene, which must include a list of the contentions that are sought to be litigated in the matter, and the bases for each contention set forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendment under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If the amendments are issued before the expiration of 30-days, the Commission will make a final determination on the issue of no significant hazards considerations. If a hearing is requested, the final determination will serve to decide when the hearing is held.

If the final determination is that the amendment request involves no significant hazards considerations, the Commission may issue the amendments and make them effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendments.

If the final determination is that the amendment request involves significant hazards considerations, any hearing held would take place before the issuance of any amendments.

Normally, the Commission will not issue the amendments until the expiration of the 15-day notice period. However, should circumstances change during the notice period, such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendments before the expiration of the 15-day notice period, provided that its final determination is that the amendments involve no significant hazards considerations. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish a notice of issuance. The Commission expects that the need to take this action will occur very infrequently.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 1717 H Street, N.W. Washington, D.C., by the above date. Where petitions are filed during the

last ten (10) days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at (800) 325-6000 (in Missouri (800) 342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to Herbert N. Berkow: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to Harold F. Reis, Esquire, Newman and Holtzer, P.C., 1615 L Street, N.W., Washington, D.C. 20036.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

For further details with respect to this action, see the application for amendments dated April 4, 1988, which is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D. C. 20555, and at the Local Public Document Room, Environmental and Urban Affairs Library, Florida International University, Miami, Florida 33199.

Dated at Rockville, Maryland, this 8th day of April, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION



Gordon E. Edison, Senior Project Manager
Project Directorate II-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation