May 9, 1990

Docket Nos. 50-250
and 50-251

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Mr. J. H. Goldberg
Executive Vice President
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

Dear Mr. Goldberg:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - REVISED TECHNICAL SPECIFICATIONS (TAC NOS. 63038 AND 63039)

The Commission has requested the Office of the Federal Register to publish the enclosed "Notice of Proposed No Significant Hazards Consideration Determination." This notice relates to your application for amendments dated June 5, 1989, as supplemented November 3, 1989, and May 1, 1990, which would replace the current custom Technical Specifications with a set of revised Technical Specifications, which are based on the Standard Technical Specifications for Westinghouse-design plants.

Sincerely,

Original signed by

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

*SEE PREVIOUS CONCURRENCE

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Florida Power and Light Company

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UNITED STATES NUCLEAR REGULATORY COMMISSION

FLORIDA POWER AND LIGHT COMPANY

DOCKET NOS. 50-250 AND 50-251

NOTICE OF PROPOSED NO SIGNIFICANT

HAZARDS CONSIDERATION DETERMINATION

On December 5, 1989, the U. S. Nuclear Regulatory Commission (the Commission) published in the FEDERAL REGISTER a notice announcing consideration of issuance of license amendments to revise the Technical Specifications (TS) for Turkey Point Units 3 and 4, Florida Power and Light Company, Consideration of Issuance of Amendments to Facility Operating Licenses and Opportunity for Hearing, V. 54, Fed. Reg. 50295 (December 5, 1989).

The Commission is considering issuance of amendments to Facility Operating License Nos. DPR-31 and DPR-41 issued to Florida Power and Light Company (FPL, the licensee) for operation of the Turkey Point Plant, Units 3 and 4, located in Dade County, Florida. The Commission is now issuing its Notice of Proposed No Significant Hazards Consideration in accordance with 10 CFR 50.91 and 50.92.

The proposed amendments would replace the current (custom) Technical Specifications (CTS), which are part of the license issued in the early 1970's, with a set of revised Technical Specifications (RTS) based on the staff's Standard Technical Specifications (STS) for Westinghouse-designed reactors. The CTS and the RTS consist of 6 parts as follows:

Part 1 - Definitions

Part 2 - Safety Limits and Limiting Safety Settings

Part 3 - Limiting Conditions for Operation (LCOs)

Part 4 - Surveillance Requirements

Part 5 - Design Features

Part 6 - Administrative Controls

It should be noted in reading the RTS that Parts 3 and 4 are presented as an integrated unit, so that the LCO and the surveillance requirement for a given plant system (or TS Section) are presented together, system by system (or Section by Section).

The licensee's amendment application (the Application) submitted on June 5, 1989, as supplemented on November 3, 1989, and May 1, 1990, included four attachments. Attachment I includes the proposed RTS and revised bases to support the RTS. Attachment II is the licensee's safety evaluation, and Appendix A of Attachment II is a supplement to the safety evaluation and provides the No Significant Hazards Evaluation. Attachment III identifies FSAR changes planned to keep the FSAR and RTS consistent with each other. Attachment IV identifies certain safety improvements, in response to separate NRC initiatives, which will be implemented as a result of implementing the RTS. Attachment IV was provided to assist the NRC in tracking progress on these other initiatives.

Throughout Appendix A of Attachment II to the Application, the licensee has characterized the proposed TS changes as: (1) administrative (non-technical), (2) more restrictive or more complete, (3) relaxations, and (4) deletion of selected requirements.

Administrative changes are non-technical in nature and are intended to make the TS easier to use for plant operations personnel.

More restrictive or more complete requirements are either more conservative than corresponding requirements in the CTS, or are additional restrictions which are not in the CTS. The more restrictive or more complete requirements provide a safety enhancement.

Any relaxations of selected existing requirements are based on many reactor-years of operating experience in the nuclear reactor industry. Requirements which are known to provide little or no safety benefit are counterproductive and may justifiably be eased or removed from the CTS. In many cases the relaxed requirements already exist in the STS and have previously been issued in TS for other plants.

Deletion of selected requirements is described on page G-1 of Appendix A of Attachment II of the Application. Deletions consist of: (1) requirements determined not to be needed for safety purposes, and (2) requirements which already exist in some other controlled document.

In the supplemental document submitted by the licensee on May 1, 1990, the changes evaluated for No Significant Hazards Consideration (Appendix A of Attachment II of the Application) are summarized and organized into tabular form. The table, entitled "Categorization of Changes to the Current Tech Specs" is provided here for clarification as Table I. The table includes no new information, but lists and organizes all the changes. The first column of the table lists the new RTS section that results from the changes to the CTS. The second column of the table lists the CTS sections being changed. The third column lists the page reference in Appendix A of Attachment II of the Application where the changes are described and evaluated for No Significant Hazards Considerations. The last four columns list the changes, by category, using the notation from Appendix A.

TABLE I

CATEGORIZATION OF CHANGES TO THE CURRENT TECH SPECS

		CATEGORY INFORMATION FROM NSH FOR REVISED TECHNICAL SPECIFICATIONS				
REVISED TECH. SPEC. NO.	CURRENT TECH. SPEC. NO(S)	NSH APPENDIX A PAGE REFERENCE(S)	ADMINISTRATIVE CHANGES	MORE COMPLETE OR RESTRICTIVE CHANGES	CHANGES THAT ARE RELAXATIONS	DELETIONS FROM THE CURRENT TECH SPECS
1.0	1.0 AND TABLE 4.1-1	1-1 THRU 1-3	A.2)a.1,2,3,4,5,6, A.2)a.7,8,9,10,11	A.2).b.	None	A.2)c.1,2,3,4,5,6,7,8 A.2)c.9,10,11,12,13
1.17	1.4, 3.05, and B3.05	1-4 THRU 1-7	A.2)	A.2)	A.2)	None
2.1.1	1.1, 2.1, and B2.1	2-1 THRU 2-2	A.2).a	A.2)b.1,2	None	None
2.1.2	1.1, 2.2, and B2.2	2-3 THRU 2-4	A.2).a	A.2)b.	None	None
2.2.1	2.3	2-5 THRU 2-7	A.2).a	A.2)b.1,2	A.2).c	None
3/4.0	3.0, 4.0, and B3.0	3/4 0-1 THRU 3/4 0-4	A.2).a	A.2)b.1	A.2).c.1,2	None
4.0.1 and Mode Issues	Throughout Specs.	3/4 0-5 THRU 3/4 0-7	A.2).a	None	A.2)b.	None
3/4.1.1.1	3.2.1.f, 3.2.4.c, Table 4.1-2 Item 1.e, 4.11, and 6.9.3.m	3/4 1-1 THRU 3/4 1-4	A.2).a	A.2)b.1,2,3	A.2).c.1,2,3	None
3/4.1.1.2	Table 4.1-2 item 1.e	3/4 1-5 THRU 3/4 1-6	A.2).a	A.2)b.1,2,3	None	None
3/4.1.1.3	3.1.2.1	3/4 1-7 THRU 3/4 1-8	A.2).a	A.2)b.	None	None
3/4.1.1.4	None, Adds New Specification	3/4 1-9 THRU 3/4 1-10	A.2).a	A.2)b.	None	None
3/4.1.2.1	3.6.a, Table 4.1-1 item 19, and Table 4.18-1 item 8	3/4 1-11 THRU 3/4 1-13	A.2).a	A.2)b.1,2	A.2).c	None
3/4.1.2.2	3.6.a, 3.6.b.2, 3.6.b.4, 3.6.c.2, 3.6.c.4, 3.6.d.2, and Table 4.18-1 item 8	3/4 1-14 THRU 3/4 1-18	A.2).a	A.2)b.1,2	A.2).c.1,2,3,4,5	None
3/4.1.2.3	3.6.b.1, 3.6.c.1, 3.6.d.1, and Table 4.1-1 items 12 and 16	3/4 1-19 THRU 3/4 1-21	A.2).a	A.2)b.1,2,3	A.2).c.1,2,3	None
3/4.1.2.4	Table 4.1-1 item 14 and Table 4.1-2 item 3	3/4 1-22 THRU 3/4 1-24	A.2).a	A.2)b.1,2,3	A.2).c.1,2	None
3/4.1.2.5	3.4.1.a.1, 3.6.b.3, 3.6.b.6, 3.6.c.3, 3.6.c.6, and Table 4.1-2 items 2 and 3	3/4 1-25 THRU 3/4 1-29	A.2).a	A.2)b.1,2,3	A.2).c.1,2,3	None
3/4.1.2.6	3.6.b.5, 3.6.c.5, 3.6.d, and Table 4.18-1 item 8	3/4 1-30 THRU 3/4 1-32	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.1.3.1	3.2.2, 3.2.4a, 3.2.4b, 3.2.5 and Table 4.1-2 item 5	3/4 1-33 THRU 3/4 1-36	A.2).a	A.2)b.1,2,3	A.2).c.1,2,3,4,5	None
3/4.1.3.2	3.2.5, and Table 4.1-1 items 9 and 10	3/4 1-37 THRU 3/4 1-39	A.2).a	A.2)b.1,2	A.2).c.1,2	None
3/4.1.3.3	Table 4.1-1 item 9	3/4 1-40 THRU 3/4 1-41	A.2).a	A.2)b.1,2,3	None	None
3/4.1.3.4	3.2.3 and Table 4.1-2 item 5	3/4 1-42 THRU 3/4 1-43	A.2).a	A.2)b.1,2	None	None
3/4.1.3.5	3.2.1.a	3/4 1-44 THRU 3/4 1-45	A.2).a	A.2)b.1,2,3	None	None
3/4.1.3.6	3.2.1.b, 3.2.1.c, 3.2.1.d, 3.2.1.g	3/4 1-46 THRU 3/4 1-47	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.2.1	3.2.6.c thru 3.2.6.g and 3.2.8	3/4 2-1 THRU 3/4 2-3	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.2.2	3.2.6.a, 3.2.6.b, and Table 4.1-1 item 1b	3/4 2-4 THRU 3/4 2-5	A.2).a	None	A.2)b.	None
3/4.2.3	3.2.6.a, 3.2.6.b, and Table 4.1-1 item 1b	3/4 2-6 THRU 3/4 2-8	A.2).a	A.2)b.	A.2).c.	None
3/4.2.4	3.2.6h and 3.2.6i	3/4 2-9 THRU 3/4 2-12	A.2).a	A.2)b.1,2,3,4	A.2).c.1,2	None
3/4.2.5	3.1.6	3/4 2-13 THRU 3/4 2-14	A.2).a	A.2)b.1,2,3	None	None
3/4.3.1	3.5.1 and Table 4.1-1	3/4 3-1 THRU 3/4 3-5	A.2).a	A.2)b.1,2	A.2).c.1,2,3,4,5	None
3/4.3.2	3.5, Table 3.5-2, Table 3.5-3, Table 3.5-4, and Table 4.1-1	3/4 3-6 THRU 3/4 3-9	A.2).a	A.2)b.1,2,3,4	A.2).c.1,2,3	None

CATEGORIZATION OF CHANGES TO THE CURRENT TECH SPECS

		CATEGORY INFORMATION FROM NSH FOR REVISED TECHNICAL SPECIFICATIONS				
REVISED TECH. SPEC. NO.	CURRENT TECH. SPEC. NO(S)	NSH APPENDIX A PAGE REFERENCE(S)	ADMINISTRATIVE CHANGES	MORE COMPLETE OR RESTRICTIVE CHANGES	CHANGES THAT ARE RELAXATIONS	DELETIONS FROM THE CURRENT TECH SPECS
3/4.3.3.1	Table 3.5-3 item 4, Table 3.5-4 item 10, Table 4.1-1 items 18A, 18B, 38a, 38b, and Table 3.5-5 items 13a and 13b	3/4 3-10 THRU 3/4 3-13	A.2).a	A.2)b.1,2,3,4,5,6	A.2).c.1,2	None
3/4.3.3.2	3.2.7	3/4 3-14 THRU 3/4 3-15	A.2).a	A.2)b.1,2,3,4	None	None
3/4.3.3.3	Table 3.5-5 items 1 thru 11 and 13 thru 15, Table 4.1-1 items 6, 15A, 15B, 16, 17A, 17B, 26, 27, 28, 29, 30, 34, 35, 36, 37, 38, 39, and 40	3/4 3-16 THRU 3/4 3-19	A.2).a.1, 2	A.2)b.1,2	A.2).c.1,2	None
3/4.3.3.4	3.14.1 and 4.15.1	3/4 3-20 THRU 3/4 3-22	A.2).a	A.2)b.1	A.2).c.1,2	None
3/4.3.3.5	3.9.1.C, Table 3.9-2, and Table 4.1-3	3/4 3-23	A.2).a	None	None	None
3/4.3.3.6	3.9.2.C, Table 3.9-3, Table 3.9-4, and Table 4.1-4	3/4 3-24 THRU 3/4 3-26	A.2).a	A.2)b.1,2,3,4,5,6,7	None	None
3/4.4.1.1	3.1.1.a.1, 3.1.1.a.3, 3.1.1.a.4, 3.4.1c, and Table 4.1-2 item 18	3/4 4-1 THRU 3/4 4-3	A.2).a	A.2)b.	A.2).c.	None
3/4.4.1.2	3.1.1.a.2, 3.4.1.d, and Table 4.1-2	3/4 4-4 THRU 3/4 4-5	A.2).a	A.2)b.	None	None
3/4.4.1.3	1.23, 3.1.1.a.2, 3.1.1.a.5, 3.4.1.e, and Table 4.1-2 item 18	3/4 4-6 THRU 3/4 4-7	A.2).a	A.2)b.	None	None
3/4.4.1.4.1	3.1.1.a.2, 3.1.1.a.5, 3.4.1.e, and Table 4.1-2 item 18	3/4 4-8 THRU 3/4 4-10	A.2).a	A.2)b.	A.2).c.1,2,3	None
3/4.4.1.4.2	3.1.1.a.2, 3.4.1.e, and Table 4.1-2 item 18	3/4 4-11 THRU 3/4 4-13	A.2).a	A.2)b.	A.2).c.1,2	None
3/4.4.2.1	3.1.1.c.1, Table 4.1-2 item 6, and B3.1.1	3/4 4-14 THRU 3/4 4-17	A.2).a	A.2)b.1,2,3,4	A.2).c.1,2,3	None
3/4.4.2.2	3.1.1.c.2, Table 4.1-2 item 6, and B3.1.1	3/4 4-18 THRU 3/4 4-19	A.2).a	A.2)b.1,2,3	None	None
3/4.4.3	3.1.1.d	3/4 4-20 THRU 3/4 4-21	A.2).a	A.2)b.1,2,3	None	None
3/4.4.4	3.1.1.e.1, 3.1.1.e.2, and 3.1.1.e.3	3/4 4-22 THRU 3/4 4-24	A.2).a	A.2)b.	A.3).a.,b.	None
3/4.4.5	4.2.5	3/4 4-25 THRU 3/4 4-26	A.2).a	A.2)b.1,2,3	None	None
3/4.4.6.1	3.1.3.f, B3.1.3, Table 4.1-1 item 20	3/4 4-27 THRU 3/4 4-30	A.2).a	A.2)b.1,2,3	A.2).c.	None
3/4.4.6.2	3.1.3a, 3.1.3b, 3.1.3c, 3.1.3d, 3.1.3e, 3.1.3g, 3.16, 4.17, and Table 4.1-2 item 11	3/4 4-31 THRU 3/4 4-34	A.2).a	A.2)b.1,2,3,4,5	A.2).c.1,2,3	None
3/4.4.7	3.1.5 and Table 4.1-2 item 1b	3/4 4-35 THRU 3/4 4-37	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.4.8	3.1.4, B3.1.4, and Table 4.1-2 item 1	3/4 4-38 THRU 3/4 4-40	A.2).a	A.2)b.1,2	A.2).c.1,2	None
3/4.4.9.1	3.1.2, B3.1.2, 4.20, and B4.20	3/4 4-41 THRU 3/4 4-42	A.2).a	A.2)b.1,2	A.2).c.1	None
3/4.4.9.2	3.1.2 and B3.1.2	3/4 4-43 THRU 3/4 4-44	A.2).a	A.2)b.1,2	None	None
3/4.4.9.3	3.15, 4.16, B3.15 and B4.15	3/4 4-45 THRU 3/4 4-47	A.2).a	A.2)b.1,2,3,4	None	None
3/4.4.10	4.2 and 4.3	3/4 4-48 THRU 3/4 4-49	A.2).a	A.2)b.	None	None
3/4.4.11	3.1.1.f, 4.19, B3.1.1 and B4.19	3/4 4-50 THRU 3/4 4-51	A.2).a	None	None	None
3/4.5.1	3.4.1.a.3, 3.4.1.b.1, 4.5.2.b.3, Table 4.1-1 item 21, and Table 4.1-2 item 10	3/4 5-1 THRU 3/4 5-3	A.2).a	A.2)b.1,2,3,4,5	A.2).c.1,2	None

CATEGORIZATION OF CHANGES TO THE CURRENT TECH SPECS

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REVISED TECH. SPEC. NO.	CURRENT TECH. SPEC. NO(S)	NSH APPENDIX A PAGE REFERENCE(S)	ADMINISTRATIVE CHANGES	MORE COMPLETE OR RESTRICTIVE CHANGES	CHANGES THAT ARE RELAXATIONS	DELETIONS FROM THE CURRENT TECH SPECS
3/4.5.2	3.4.1.a.4 thru 3.4.1.a.7, 3.4.1.b.2, 3.4.1.b.4 thru 3.4.1.b.7, 4.5.1, 4.5.2.a, 4.5.2.b.1, 4.5.2.b.2, 4.5.2.b.4, and Table 4.18-1 items 1 and 2	3/4 5-4 THRU 3/4 5-9	A.2).a	A.2)b.1,2,3,4,5,6	A.2).c.1,2,3,4,5,6	None
3/4.5.3	None, Adds New Specification	3/4 5-10 THRU 3/4 5-11	A.2).a	A.2)b.1,2,3	None	None
3/4.5.4	3.4.1.a.1 and Table 4.1-2 item 2	3/4 5-12 THRU 3/4 5-13	A.2).a	A.2)b.1,2,3	A.2).c.	None
3/4.6.1.1	3.3.1	3/4 6-1 THRU 3/4 6-2	A.2).a	A.2)b.1,2,3	A.2).c.	None
3/4.6.1.2	4.4.1, 4.4.2, and 4.4.3	3/4 6-3 THRU 3/4 6-4	A.2).a	A.2)b.1,2,3	None	None
3/4.6.1.3	3.3.4 and 4.4.2	3/4 6-5 THRU 3/4 6-6	A.2).a	A.2)b.1,2,3	None	None
3/4.6.1.4	3.3.2	3/4 6-7 THRU 3/4 6-8	A.2).a	A.2)b.	None	None
3/4.6.1.5	None, Adds New Specification	3/4 6-9 THRU 3/4 6-10	A.2).a	None	None	None
3/4.6.1.6	4.4.5, 4.4.6, and 4.4.7	3/4 6-11 THRU 3/4 6-12	A.2).a	A.2)b.1,2,3,4,5,6,7,8	None	None
3/4.6.1.7	3.3.3 and 4.4.2	3/4 6-13 THRU 3/4 6-14	A.2).a	A.2)b.1,2,3,4,5	None	None
3/4.6.2.1	3.4.2, 4.6, Table 4.18-1 item 4	3/4 6-15 THRU 3/4 6-18	A.2).a	A.2)b.1,2,3	A.2).c.1,2,3	None
3/4.6.2.2	3.4.2 and 4.6	3/4 6-19 THRU 3/4 6-21	A.2).a	A.2)b.1,2	A.2).c.1,2,3	None
3/4.6.3	3.4.3a, 3.4.3b, and 4.7	3/4 6-22 THRU 3/4 6-24	A.2).a	A.2)b.1,2,3,4	A.2).c.	None
3/4.6.4	3.3.3, B3.3.3, 4.4.3, and Table 4.2-1 item 8	3/4 6-25 THRU 3/4 6-26	A.2).a	A.2)b.1	None	None
3/4.6.5	B4.18, Table 3.5-5 item 12, Table 4.1-1 item 37, and Table 4.18-1 item 11	3/4 6-27 THRU 3/4 6-29	A.2).a	A.2)b.1,2,3	A.2).c.	None
3/4.6.6	3.4.6, 4.7.2, and Table 4.18-1 item 9	3/4 6-30 THRU 3/4 6-31	A.2).a	A.2)b.	A.2).c.	None
3/4.7.1.1	3.8.1a, B3.8, Table 4.1-2 item 7	3/4 7-1 THRU 3/4 7-3	A.2).a	A.2)b.1,2	A.2).c.1,2	None
3/4.7.1.2	3.18, 4.10, Table 4.18-1 item 3	3/4 7-4 THRU 3/4 7-6	A.2).a	A.2)b.	A.2).c.	None
3/4.7.1.3	3.19, B3.19, and 4.22	3/4 7-7 THRU 3/4 7-8	A.2).a	None	A.2)b.	None
3/4.7.1.4	3.8.2	3/4 7-9 THRU 3/4 7-10	A.2).a	A.2)b.1,2,3	None	None
3/4.7.1.5	3.8.1.b, 3.8.1.c, 3.8.3, 4.9, and B4.9	3/4 7-11 THRU 3/4 7-12	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.7.1.6	3.20, 4.21, B3.20, and B4.21	3/4 7-13 THRU 3/4 7-14	A.2).a	A.2)b.	None	None
3/4.7.2	3.4.4, B3.4.4, and Table 4.18-1 item 6	3/4 7-15 THRU 3/4 7-18	A.2).a	A.2)b.1,2,3	A.2).c.1,2,3,4	None
3/4.7.3	3.4.5, B3.4.5, and Table 4.18-1 item 7	3/4 7-19 THRU 3/4 7-22	A.2).a	A.2)b.1,2	A.2).c.1,2,3,4	None
3/4.7.4	None, Adds New Specification	3/4 7-23 THRU 3/4 7-24	A.2).a	None	None	None
3/4.7.5	3.4.7, 4.7.3, and B4.7	3/4 7-25 THRU 3/4 7-27	A.2).a	A.2)b.1,2,3,4	A.2).c.1	None
3/4.7.6	3.13 and 4.14	3/4 7-28 THRU 3/4 7-29	A.2).a	A.2)b.	None	None
3/4.7.7	3.11, 4.13, and B3.11	3/4 7-30 THRU 3/4 7-32	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.7.8.1	3.14.2 and 4.15.2	3/4 7-33 THRU 3/4 7-35	A.2).a	A.2)b.1,2,3	A.2).c.1,2	None
3/4.7.8.2	3.14.3 and 4.15.3	3/4 7-36 THRU 3/4 7-39	A.2).a	A.2)b.1,2,3	A.2).c.1,2	None
3/4.7.8.3	3.14.4 and 4.15.4	3/4 7-40 THRU 3/4 7-42	A.2).a	None	A.2)b.1,2	None
3/4.7.8.4	None, Adds New Specification	3/4 7-43 THRU 3/4 7-44	A.2).a	None	None	None
3/4.7.9	3.14.5 and 4.15.5	3/4 7-45 THRU 3/4 7-47	A.2).a	A.2)b.1	A.2).c.1,2	None
3/4.8.1.1	3.7, 4.8.1, B3.7, B4.8, Table 4.8-1, Table 4.1-2 item 12 and Table 4.18-1 item 5	3/4 8-1 THRU 3/4 8-9	A.2).a.1	A.2)b.1,2,3,4,5,6,7,8 A.2)b.9,10,11,12	A.2).c.1,2,3,4,5,6,7	None

CATEGORIZATION OF CHANGES TO THE CURRENT TECH SPECS

		CATEGORY INFORMATION FROM NSH FOR REVISED TECHNICAL SPECIFICATIONS				
REVISED TECH. SPEC. NO.	CURRENT TECH. SPEC. NO(S)	NSH APPENDIX A PAGE REFERENCE(S)	ADMINISTRATIVE CHANGES	MORE COMPLETE OR RESTRICTIVE CHANGES	CHANGES THAT ARE RELAXATIONS	DELETIONS FROM THE CURRENT TECH SPECS
3/4.8.1.2	None, Adds New Specification	3/4 8-10	A.2).a	None	None	None
3/4.8.2.1	3.7, 4.8.2, B3.7, and B4.8	3/4 8-11 THRU 3/4 8-14	A.2).a	A.2)b.1,2,3	A.2).c.1,2	None
3/4.8.2.2	None, Adds New Specification	3/4 8-15	A.2).a	None	None	None
3/4.8.3.1	3.7, B3.7, Table 4.18-1 item 10	3/4 8-16 THRU 3/4 8-18	A.2).a	A.2)b.1,2,3,4,5,6	A.2).c.1	None
3/4.8.3.2	None, Adds New Specification	3/4 8-19	A.2).a	None	None	None
3/4.9.1	3.10.8, B3.10.8, and Table 4.1-2 item 13	3/4 9-1 THRU 3/4 9-2	A.2).a	A.2)b.1,2	A.2).c.	None
3/4.9.2	3.10.3, B3.10.3, and Table 4.1-1 item 3	3/4 9-3 THRU 3/4 9-4	A.2).a	A.2)b.1,2	None	None
3/4.9.3	3.10.5 and B3.10.5	3/4 9-5 THRU 3/4 9-6	A.2).a	A.2)b.	None	None
3/4.9.4	3.10.1 and B3.10.1	3/4 9-7 THRU 3/4 9-8	A.2).a	A.2)b.	None	None
3/4.9.5	3.10.6 and B3.10.6	3/4 9-9 THRU 3/4 9-10	A.2).a	A.2)b.	None	None
3/4.9.6	Table 4.1-2 item 9	3/4 9-11 THRU 3/4 9-12	A.2).a	A.2)b.1,2,3,4,5	A.2).c.	None
3/4.9.7	3.10.9 and B3.10.9	3/4 9-13 THRU 3/4 9-14	A.2).a	A.2)b.	None	None
3/4.9.8.1	3.10.7.1, B3.10.7, Table 4.1-1 item 13, and Table 4.1-2 item 18	3/4 9-15 THRU 3/4 9-17	A.2).a	A.2)b.	A.2).c.	None
3/4.9.8.2	3.10.7.2, B3.10.7, and Table 4.1-2 item 18	3/4 9-18 THRU 3/4 9-20	A.2).a	A.2)b.	A.2).c.	None
3/4.9.9	3.10.2, B3.10.2, and Table 4.1-2 item 8	3/4 9-21 THRU 3/4 9-22	A.2).a	A.2)b.	None	None
3/4.9.10	None, Adds New Specification	3/4 9-23 THRU 3/4 9-24	A.2).a	A.2)b.	None	None
3/4.9.11	None, Adds New Specification	3/4 9-25 THRU 3/4 9-26	A.2).a	A.2)b.	None	None
3/4.9.12	3.12, B3.12, Table 4.1-2 item 17	3/4 9-27 THRU 3/4 9-28	A.2).a	A.2)b.	None	None
3/4.9.13	3.10.4, B3.10.4, and Table 4.1-1 item 18A	3/4 9-29 THRU 3/4 9-30	A.2).a	A.2)b.1,2	None	None
3/4.9.14	3.17, B3.17, Table 4.1-2 item 13	3/4 9-31 THRU 3/4 9-32	A.2).a	A.2)b.	None	None
3/4.10.1	" 3.2.1f	3/4 10-1 THRU 3/4 10-2	A.2).a	A.2)b.	None	None
3/4.10.2	3.2.1a, 3.2.1b, 3.2.1c, 3.2,6.d, and 3.2.6.h	3/4 10-3 THRU 3/4 10-4	A.2).a	A.2)b.	None	None
3/4.10.3	3.1.2.1, 3.2.1.a, 3.2.1.b, 3.2.1.c	3/4 10-5 THRU 3/4 10-6	A.2).a	A.2)b.	None	None
3/4.10.5	None, Adds New Specification	3/4 10-7 THRU 3/4 10-8	A.2).a	A.2)b.	None	None
3/4.11.1.1	3.9.1a, B3.9.1a, and Table 3.9-1	3/4 11-1 THRU 3/4 11-2	A.2).a	A.2)b.	None	None
3/4.11.1.2	3.9.1.b, 6.9.3e, and B3.9.1.b	3/4 11-3 THRU 3/4 11-4	A.2).a	None	None	None
3/4.11.1.3	3.9.1.d, B3.9.1.d, and 6.9.3.f	3/4 11-5 THRU 3/4 11-6	A.2).a	None	None	None
3/4.11.2.1	3.9.2a, B3.9.2.a, and Table 3.9-3	3/4 11-7 THRU 3/4 11-8	A.2).a	None	A.2)b.	None
3/4.11.2.2	3.9.2b, B3.9.2b, and 6.9.3.e	3/4 11-9 THRU 3/4 11-10	A.2).a	None	None	None
3/4.11.2.3	3.9.2.c, B3.9.2.c, and 6.9.3.e	3/4 11-11 THRU 3/4 11-12	A.2).a	None	None	None
3/4.11.2.4	3.9.2e, B3.9.2e, and 6.9.3g	3/4 11-13 THRU 3/4 11-14	A.2).a	None	None	None
3/4.11.2.5	3.9.2.g, B3.9.2.g, Table 3.9-4	3/4 11-15 THRU 3/4 11-16	A.2).a	None	None	None
3/4.11.2.6	3.9.2.f and B3.9.2.f	3/4 11-17 THRU 3/4 11-18	A.2).a	A.2)b.	None	None
3/4.11.3	3.9.3 and B3.9.3	3/4 11-19 THRU 3/4 11-20	A.2).a	A.2)b.	None	None
3/4.11.4	3.9.2.h, B3.9.2.h, and 6.9.3.h	3/4 11-21 THRU 3/4 11-22	A.2).a	A.2)b.	None	None
3/4.12.1	4.12.1, B4.12.1 and 6.9.3i	3/4 12-1	A.2).a	None	None	None
3/4.12.2	4.12.2 and B4.12.2	3/4 12-2	A.2).a	None	None	None
3/4.12.3	4.12.3 and B4.12.3	3/4 12-3 THRU 3/4 12-4	A.2).a	None	None	None
5.1	5.1	5-1 THRU 5-3	A.2).a	A.2)b.	A.2).c.	None

CATEGORIZATION OF CHANGES TO THE CURRENT TECH SPECS

		CATEGORY INFORMATION FROM NSH FOR REVISED TECHNICAL SPECIFICATIONS				
REVISED TECH. SPEC. NO.	CURRENT TECH. SPEC. NO(S)	NSH APPENDIX A PAGE REFERENCE(S)	ADMINISTRATIVE CHANGES	MORE COMPLETE OR RESTRICTIVE CHANGES	CHANGES THAT ARE RELAXATIONS	DELETIONS FROM THE CURRENT TECH SPECS
5.2.1	None, Adds New Design Feature	5-4	A.2).a	None	None	None
5.2.2	5.3.A.2	5-5 THRU 5-6	A.2).a	A.2)b.	None	None
5.3.1	5.2.1	5-7 THRU 5-8	A.2).a	None	None	None
5.3.2	5.2.5	5-9 THRU 5-10	A.2).a	None	None	None
5.4.1	None, Adds New Design Feature	5-11 THRU 5-12	A.2).a	None	None	None
5.4.2	5.2.3	5-13 THRU 5-14	A.2).a	None	None	None
5.5	None, Adds New Design Feature	5-15 THRU 5-16	A.2).a	None	None	None
5.6.1	5.4.2 and 5.4.3	5-17 THRU 5-18	A.2).a	A.2)b.1,2	None	None
5.6.2	None, Adds New Design Feature	5-19 THRU 5-20	A.2).a	None	None	None
5.6.3	None, Adds New Design Feature	5-21 THRU 5-22	A.2).a	None	None	None
5.7	None, Adds New Design Feature	5-23 THRU 5-24	A.2).a	None	None	None
6.1	6.1.1	6-1 THRU 6-2	A.2).a	A.2)b.	None	None
6.2.1	6.2.1	6-3 THRU 6-4	A.2).a	None	None	None
6.2.2	6.2.2	6-5 THRU 6-6	A.2).a	A.2)b.	None	None
6.2.3	6.3.1	6-7 THRU 6-8	A.2).a	None	None	None
6.3	6.3	6-9 THRU 6-10	A.2).a	A.2)b.	None	None
6.4	6.4	6-11 THRU 6-12	A.2).a	A.2)b.	None	None
6.5.1	6.5.1	6-13 THRU 6-15	A.2).a	A.2)b.1,2,3	A.2)c.1	None
6.5.2	6.5.2	6-16 THRU 6-17	A.2).a	None	A.2)b.	None
6.5.3	None, Adds New Specification	6-18 THRU 6-19	None	A.2).a	A.2).a	None
6.6	6.6	6-20 THRU 6-21	A.2).a	None	None	None
6.7	6.7	6-22 THRU 6-25	A.2).a	A.2)b.2	A.2)b.1 and A.2)c.1,2	None
6.8	6.8, 6.13, 6.14, 6.15, and 6.16	6-26 THRU 6-28	A.2).a	A.2)b.1,2	A.2)c	None
6.9.1	6.9, 6.9.1, 6.9.3, and 6.9.4	6-29 THRU 6-32	A.2).a	A.2)b.1,2	None	None
6.9.2	6.9.3.a, 6.9.3.b, and 6.9.3.c	6-33 THRU 6-34	A.2).a	None	None	None
6.10	6.10	6-35 THRU 6-36	A.2).a	A.2)b.1,2	None	None
6.11	6.11	6-37 THRU 6-38	A.2).a	None	None	None
6.12	6.12	6-39 THRU 6-41	A.2).a	A.2)b.1,2	A.2)b.3	None
6.13	6.17	6-42 THRU 6-43	A.2).a	A.2)b.	None	None
6.14	6.18	6-44 THRU 6-45	A.2).a	None	None	None
6.15	None, Adds New Specification	6-46 THRU 6-47	None	A.2).a	None	None
None	3.4.1.a.2	G-1 THRU G-4	None	None	one item	3.4.1.a.2
None	Table 4.1-1	G-1 THRU G-4	None	None	seven items	Table 4.1-1 items, 12, 13, 14, 16, 19, 24, 25
None	Table 4.1-2	G-1 THRU G-4	None	None	four items	Table 4.1-2 items 4, 9, 15, and 16
None	4.18	G-1 THRU G-4	None	None	one item	4.18 "power availability"
None	Section 5 Design Features	G-1 THRU G-4	None	None	eleven items	5.2 2a & 2b, 5.3.A.1, 5.3.A.2, 5.3.B1 & B2, 5.3.C.1, 5.3.C.2, 5.3.C.3, 5.4.1, and 5.2.4

The Commission provides bases for a proposed no significant hazards consideration determination in 10 CFR 50.92. These include the three standards set forth in 10 CFR 50.92 for determining whether a significant hazards consideration exists. Under the Commission's regulations in 10 CFR 50.92, a proposed amendment involves no significant hazards consideration if 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.

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.

Evaluation

The licensee performed a detailed evaluation of the changes proposed in the RTS against the above standards and concluded that none of the proposed changes involves a significant hazards consideration. Reference: Attachment II, Appendix A, of the Application.

The staff reviewed the No Significant Hazards Evaluation (NSHE) provided in Attachment II, Appendix A to the June 5, 1989 license amendment proposal. Based on that review, the staff agrees with the licensee's conclusions that the proposed amendments involve no significant hazards considerations. The staff has selected examples of the proposed TS changes in each of the four categories of characterization (administrative, more restrictive, etc.) employed by the licensee and which also cover the six parts of the RTS, and they are discussed below. These examples are considered to be typical of the proposed changes. The staff's evaluation of no significant hazards is presented below.

Category 1 - Administrative changes

Examples of administrative changes include consolidation of requirements in one place, reformatting of requirements, numbering of all pages, and revision of definitions (Part 1 of the TS). Three examples are discussed below.

Example 1: Consolidation

In the CTS, requirements for a given plant system or component are often dispersed throughout a number of Sections of the CTS. The RTS consolidates the requirements for a given system or component into one Section, which improves TS organization. The changes in the Refueling Water Storage Tank requirements are an example of this type of change. The CTS limits on borated water volume and boron concentration are located on page 3.4-1 of the CTS in section 3.4.1.a.1, and the requirement for a weekly verification of boron concentration is found in Table 4.1-2, item 2 (there is no page number; the table is located six pages past page 4.1-1). In the RTS, this information is consolidated in one place in a Refueling Water Storage Tank TS, on page 3/4 5-9, located in Section 3.5.4, Limiting Conditions for Operation, and on the same page, Section 4.5.4, Surveillance Requirements.

Because there is no technical change related to consolidation, i.e., the consolidated requirements remain the same, consolidation does 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 three standards of 10 CFR 50.92 are satisfied and the staff concludes there is no significant hazards consideration.

The staff also concludes that, throughout the RTS where consolidation has been made, there are no significant hazards considerations involved.

Example 2: Reformatting

In the CTS, beginning on page 3.1-1, the format of the TS consists of a very generalized statement of applicability, a statement of purpose of the TS, and a detailed specification which combines requirements with actions to be taken if requirements are not met. The RTS have an improved format which sets forth the requirement stated as the Limiting Condition of Operation (LCO), the operational mode applicability, and the statement of action required if the LCO is not met. These requirements (LCO, applicability, and action) are organized as separate entities and presented in the same sequence with a heading in capital letters throughout sections 3 and 4 of the RTS.

Reformatting has not resulted in any changes to the plant operating requirements that are in the RTS. Since reformatting does not change any of the requirements contained in the TS, reformatting does 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 three standards of 10 CFR 50.92 are satisfied, and the staff concludes there is no significant hazards consideration. The staff also concludes that reformatting throughout the RTS involves no significant hazards considerations.

Example 3: Revision of Definitions

In its no significant hazards evaluation (Appendix A of Attachment II of the Application, pages 1-1 through 1-3) the licensee evaluated changes in

Part 1 (definitions) of the CTS and concluded that no significant hazards consideration is involved. On page 1-1 of Appendix A, in items 2.a, 2.b and 2.c respectively, the licensee notes that 11 new definitions have been added, refueling interval has been explicitly defined and 13 definitions have been deleted. Generally, the added definitions are related to specific parameters which the TS help to control, such as various leakages, tests, and neutron flux. Examples of added definitions include pressure boundary leakage, actuation logic test, and axial flux difference. The deleted definitions, on the other hand, are general terms which are either not needed for specific controls, or are not needed because they already exist somewhere else (for example, in the Code of Federal Regulations). Examples of deleted definitions include design power, safety limits, and reactor protection system.

The licensee has addressed the three criteria of 10 CFR 50.92(c) and determined that they are satisfied because:

(1) The proposed change as described in Item 2.a is similar to example (i) of 48 FR 14870 in that it is an administrative change which consolidates current requirements into a technical specification format consistent with the Standard Technical Specifications and does not involve [technical] or plant modifications.

(2) The change in Item 2.b is similar to example (ii) of 48 FR 14870 in that it provides additional restrictions and controls by requiring surveillances with frequency "R" to be performed at least once per 18 months.

(3) The proposed changes described in Item 2.c represent definitions of terms which are not used or which are defined in other places in the revised technical specifications. In some cases, the proposed changes described in Item 2.c represent restrictions to plant operation. In each case where an omitted definition contains a restriction, the restriction is included in another section of the revised technical specifications.

Therefore, the proposed changes described in Item 2.c also are similar to example (i) of 48 FR 14870 in that they are administrative changes which consolidate current requirements into a technical

specification format consistent with the Standard Technical Specifications and do not involve technical or plant modifications.

The staff agrees with the licensee's conclusion that there are no significant hazards considerations, with the following additional comments. The changes in definitions described on pages 1-1 through 1-3 of Appendix A to Attachment II of the Application do 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 because: (a) the added definitions help to clarify and avoid misinterpretation of existing terms related to specific controls and tests, and (b) those definitions deleted are either very general and therefore not very useful, or they exist elsewhere, or their useful content is included in the specific relevant technical specification. For example, one deleted definition is Limiting Conditions for Operation (LCO). While the LCO definition might be of interest to persons outside the reactor operations field, the definition in the CTS ("those restrictions on reactor operation, resulting from equipment performance capability, that must be enforced to ensure safe operation of the facility") is obvious and unnecessary for reactor operators and personnel and NRC staff by whom the TS are used. Furthermore, LCO is described in 10 CFR 50.36. An example where a deleted definition has its useful content transferred to a specific TS is "Safety Limits". In the CTS on page 1-1, the definition states that if any safety limit is exceeded, the reactor shall be shut down until the AEC (now the NRC) authorizes resumption of operation. This statement refers to action required rather than stating a definition. The action to shut down has been transferred to the individual RTS Section for safety limits in Part 2. The action to remain shutdown until NRC approval is obtained to restart is transferred

to page 6-13 of the RTS in Section 6.7.1.d. The remainder of the "Safety Limits" definition in the CTS is general in nature and is also described in 10 CFR 50.36.

The revision of the definition of refueling interval specifies a time interval of 18 months or less, which clarifies what is meant by refueling interval. No specific time interval is defined in the CTS so that a refueling interval could be any convenient period of time resulting from an actual fuel cycle. The revised definition brings the Turkey Point definition in line with STS practice in the industry. No significant increase in probability or consequences of an accident, creation of a new or different kind of accident, or reduction in a margin of safety can result from these changes because the revised definition is narrower, and is thus encompassed within the CTS definition.

Category 2 - RTS requirements which are more restrictive or more complete than CTS requirements

Examples of proposed changes in requirements which are more restrictive or more complete than those now in the CTS are discussed below. These include: examples of changes to safety limits and limiting safety settings in Part 2 of the TS, examples of changes to LCOs in Part 3 of the TS, examples of changes to surveillance requirements in Part 4 of the TS, and examples of changes to administrative controls in Part 6 of the TS.

Example 1: Safety limits and limiting safety settings

In CTS Sections 1.1 (page 1-1) and 2.1 (page 2.1-1) covering reactor core safety limits, the combination of reactor pressure, temperature, and thermal power level are not permitted to exceed certain limits provided in Figure 2.1-1 (no page number). However, no explicit required action is identified in the

CTS if the limits are exceeded. Instead, the operators are referred to CTS Section 3.0.1 which requires that action be initiated within 1 hour to reduce reactor power and place the reactor in a different appropriate operating mode, the earliest being Hot Standby (operational mode 3) within 6 hours. However, in the RTS Section 2.1 (page 2-1), the same limits apply, but a specific explicit action statement has been added. This follows the format of the STS. The action statement is more restrictive because (1) it requires the operators to place the reactor in Hot Standby within 1 hour instead of 6 hours, and (2) it refers the operator to Section 6.7.1 (page 6-12) of the RTS, which provides reporting requirements.

Also, CTS Section 2.1 requires that specified power/pressure/temperature limits for one- and two-loop operation and natural circulation not be exceeded. However, because these limits have not been analyzed in the safety analysis, they are being deleted.

In the licensee's no significant hazards evaluation, Appendix A of Attachment II of the Application, pages 2-1 and 2-2, the licensee evaluated the changes to Section 2.1 of the CTS in accordance with the three standards of 10 CFR 50.92(c) and concluded that the changes do not involve a significant hazards consideration. The NRC staff agrees with the licensee's determination and adds the comments below regarding the three standards of 10 CFR 50.92(c).

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

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

No increase in accident probability will result from reducing reactor power sooner when core limits are exceeded, because reducing power sooner will bring the reactor back to within the required limits at an earlier time. Also, restricting the reactor to three-loop operation removes the possibilities for thermal stresses and temperature gradients associated with asymmetric coolant flow which could accompany operation with only one or two coolant loops. In addition, since there is no change in the design basis accidents, no increase in consequences is possible.

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

Because the changes merely deal with reducing the reactor power sooner to bring the reactor back within required limits, there is no new or different kind of accident created. The removal of alternative conditions of operation, such as two-loop operation, does not create a new or different kind of accident because no new operating conditions are incorporated.

(3) Involve a significant reduction in a margin of safety.

The proposed changes increase the margin of safety by requiring the reactor to reach Hot Standby sooner, by limiting the operation to three loops, and by providing clear guidance for timely notification of authorities.

The staff concludes that the above changes do not involve a significant hazards consideration. The staff further concludes that, throughout the RTS, similar proposed changes involving safety limits and safety settings found primarily in Part 2, which are as restrictive as, or more restrictive than, the

CTS, meet the standards of 10 CFR 50.92(c) and do not involve significant hazards considerations.

Example 2: LCOs

The CTS provided no requirements for containment air temperature. The changes proposed in Section 3/4.6.1.5 of the RTS (page 3/4 6-7) include new limits on containment air temperature, an action statement that requires reactor power reduction if the limits are exceeded for a stated time interval, and stated operational mode applicability (modes 1 through 4) that applies the LCO and action statement to those operating modes in which a serious accident is most likely to occur (at power or while the reactor is hot).

In Appendix A of Attachment II of the Application, pages 3/4 6-9 and 6-10, the licensee evaluated these additional and more limiting requirements against the three standards of 10 CFR 50.92(c) and concluded that the proposed changes do not involve significant hazards considerations. The staff agrees with the licensee's conclusion and adds the following comments. Because additional and more limiting requirements are imposed on plant operation, the probability of an accident and its consequences are reduced. It is less likely that the containment and the equipment in it will fail or cause an accident due to high temperatures. Thus, there would be no increase in probability or consequences of an accident. There will be no new or different kind of accident created, nor any reduction in a margin of safety because the added requirements (addition of an LCO, action statement, and mode applicability) are all as restrictive, or more restrictive, than the CTS.

Therefore, the staff concludes that the three standards of 10 CFR 50.92(c) are met, and that there are no significant hazards considerations. The staff further concludes that, throughout the RTS, proposed changes consisting of

additional or more restrictive LCOs, action statements, and mode applicability involve no significant hazards considerations.

Example 3: Surveillances and tests

In the containment air temperature example discussed above, no surveillance or test requirements were provided in the CTS. The proposed changes in the RTS in Part 4 (page 3/4 6-7) add a surveillance requirement to determine containment temperature at various locations at least once every 24 hours. In Appendix A of Attachment II of the Application, pages 3/4 6-9 and 6-10, the licensee evaluated these changes against the three standards of 10 CFR 50.92(c), and reached the conclusion that no significant hazards considerations are involved. The staff agrees with the licensee's conclusion and offers the following comments. Adding new surveillance requirements or increasing the frequency of existing surveillances for equipment that is important to safe plant operation can provide additional knowledge of the plant status so that operators can take timely corrective action if needed. Therefore, this helps to reduce the probability or consequences of an accident. Such action also helps to prevent new or different kinds of accidents from occurring, and helps to maintain desired margins of safety.

The staff concludes that the three standards of 10 CFR 50.92(c) are met, and there are no significant hazards considerations involved. The staff also concludes that, throughout the RTS, where surveillance or tests have been added or made more extensive or frequent, there are no significant hazards considerations involved.

Example 4: Administrative controls

Changes proposed in Part 6 of the RTS include changes in requirements for reporting, qualifications for operators, procedures, training scope, programs

(e.g., chemistry), records retention, high radiation areas, review and oversight by review committees, and NRC approval of the Process Control Program. All of these changes are evaluated by the licensee in pages 6-1 through 6-47 of Appendix A of Attachment II of the Application. The licensee has evaluated these types of changes against the three standards of 10 CFR 50.92(c) and concluded they do not involve significant hazards considerations. The staff has reviewed all of these changes individually and agrees with the licensee's conclusion.

Reporting requirements are considered to be typical of administrative controls in that they do not have a strong immediate influence on the probability of an accident or its consequences (compared, for example, to the level of reactor pressure or temperature or the availability of cooling systems), or on the kind of accident or the margins of safety. A detailed example and analysis of the proposed changes follows.

In Sections 6.9, 6.9.1, 6.9.3, and 6.9.4, beginning on page 6-15 of the CTS, requirements are described for reporting various information items to the NRC. The RTS adds a new requirement for reporting challenges to the PORVs or safety valves. In addition, the RTS clarifies the reporting of changes in the analytical procedure for determining peaking factor limits.

These RTS changes do not significantly increase the probability or consequences of an accident previously evaluated because reporting requirements are only indirectly linked to accident probability. Adding reporting requirements in the RTS does not significantly increase accident or consequence probability, does not create a new or different kind of accident, and does not reduce safety margins. Reporting requirements alert the NRC to the status of plant operational activities of the licensee and provide generic information

for use in long-term investigative programs. Likewise, the clarification of requirements simply removes some of the latitude for interpretation previously available to the licensee.

The three standards of 10 CFR 50.92(c) are met for these changes, and the staff concludes that there are no significant hazards considerations.

Category 3 - Relaxation of CTS Requirements

Throughout Appendix A of Attachment II of the Application, the licensee has identified a number of changes characterized as "relaxations" from the CTS. The NRC staff review has determined there are no cases where a significant relaxation has been made and not identified as such. In a few cases the staff does not agree there is a relaxation, but because the licensee's characterization is conservative, it is an acceptable characterization. Nearly all of the licensee's proposed relaxations are in Parts 3 and 4 (LCOs and surveillance requirements) of the RTS. Only one relaxation was proposed in Part 2 (safety limits), on page 2-5 of Appendix A of Attachment II of the Application; the staff does not agree it is a relaxation. Furthermore, the staff found no relaxations in Part 1 (definitions) or Part 5 (design features). There were 4 relaxations proposed in Part 6 (administrative controls); these are described in Appendix A of Attachment II of the Application on page 6-13, item A.2.c, page 6-23, items A.2.c.1 & A.2.c.2, and page 6-26, item A.2.c. These relaxations of administrative controls are not significant because they are minor changes which have only a weak link to operational safety. For example, the changes proposed on page 6-23, items A.2.c.1 & A.2.c.2 of Appendix A of Attachment II of the Application relax the time limit permitted for some reporting requirements.

Therefore, the only relaxations of any significance are in Parts 3 and 4. Examples of proposed relaxations which are typical of those in Part 3 (LCOs) and Part 4 (surveillance requirements) and the evaluation of no significant hazards considerations are discussed below.

Example 1: Relaxation of LCOs and surveillance frequencies

In CTS sections 3.2.4.a & b and 3.2.5, pages 3.2-2 and 3.2-3, requirements on movable control rods are stated. These include: a limit of 0.3% potential reactivity insertion by ejection of an inoperable rod, and a reduction of the high flux trip setpoint limit when alarms for both rod deviation and power range channel deviation are inoperable. If either of these two alarms are inoperable, the CTS action requires that control rod positions be logged once per shift. The licensee has evaluated a proposed relaxation of the above requirements in Appendix A of Attachment II of the Application, pages 3/4 1-33, items A.2.c.1,2,3, and 4, and on pages 3/4 1-34, 35, and 36. The first (0.3%) LCO is relaxed in the RTS by deleting the requirement. The setpoint reduction LCO is relaxed by replacing the requirement for a setpoint limit reduction with two requirements which increase the surveillance of the two parameters. The rod position surveillance frequency is increased from once per 12 hours to once per 4 hours when the rod deviation alarm is inoperable, and the quadrant power tilt surveillance frequency is increased from once per 7 days to once per 12 hours when the power range deviation alarm is inoperable. The CTS action is relaxed in the RTS by replacing the logging of rod positions once per shift with the more useful action of calculating the quadrant power tilt ratio once per 12 hours. The licensee also proposes to relax the surveillance frequency for rod operability from 14 days in the CTS to 31 days in the RTS.

The licensee determined that the three standards of 10 CFR 50.92(c) have been met and there are no significant hazards considerations. The licensee's evaluation relevant to the requirements of item (A)2.c discussed here is reproduced below:

> The proposed change to relax the requirements in Item 2.c above, does not involve a significant hazards consideration because these changes do not:
>
> a: Involve a significant increase in the probability of or consequences of an accident previously evaluated.
>
> The reactivity limit in the current TS is not needed to preserve any rod ejection analysis design assumption. Other restrictions in the proposed TS for MOVABLE CONTROL ASSEMBLIES ensure that the normal rod insertion and alignment limits are preserved thereby preserving the original safety analysis limiting assumptions related to rod position.
>
> The current Technical Specification requirement to reduce the hi-flux trip setpoint when both the rod deviation and the power range channel deviation alarm are inoperable is replaced with more frequent surveillances. The rod position surveillance is increased from once per 12 hours to once per 4 hours when the rod deviation alarm is inoperable. In the quadrant power tilt Technical Specification the power tilt surveillance is increased from once per 7 days to once per 12 hours when the power range deviation alarm is inoperable. The increased surveillances will adequately compensate for an INOPERABLE rod position deviation or power range channel deviation alarm and are consistent with industry practice in that these are the same SURVEILLANCE REQUIREMENTS as in the Standard Technical Specifications.
>
> Relaxing the rod OPERABILITY test surveillance from 14 to 3[1] days has no impact on control rod availability because of the insignificant number of control rod drive failures determined by the current bi-weekly surveillance test. The proposed surveillance reduction will also have the benefit of decreasing the likelihood of inadvertently dropping a rod during the test and reducing wear on the rod drive mechanism from the surveillance test. The proposed 3[1] day test interval is also consistent with industry practice in that 3[1] days is the Standard Technical Specifications surveillance interval.
>
> In summary, the proposed relaxations of current Technical Specification requirements do not significantly increase the probability of or consequences of a previously evaluated accident because: The 0.3% reactivity limit is not necessary to preserve any Safety Analysis margin, setpoint reduction is not

as appropriate a requirement to compensate for an INOPERABLE rod position deviation and flux deviation alarm as the increased surveillance, the 3[1] day surveillance to verify rod OPERABILITY, combined with other rod position surveillance requirements will adequately verify rod OPERABILITY.

b. Create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new mode of plant operation nor involves a physical modification to the plant.

c. Involve a significant reduction in a margin of safety. As discussed in item 3a above, the 0.3% reactivity limit is not a restriction based on any safety analysis assumption, the hi-flux setpoint reduction is not necessary to compensate for any adverse impact of an INOPERABLE rod position and flux deviation alarm in the safety analysis, and the 31 day OPERABLE rod surveillance is consistent with industry practice and the Standard Technical Specifications.

Based on the above considerations, the changes included in the development of proposed Technical Specifications 3/4.1.3.1 are considered not to involve a significant hazards consideration as defined in 10 CFR 50.92.

The staff agrees with the licensee's evaluation and conclusion and adds the following comments. In part a. there is a typographical error in that the rod operability surveillance test frequency is referred to four times as 30 days instead of the correct value of 31 days. This example involves deleting an LCO that is not needed to preserve any safety analysis assumption. Where this type of change occurs in the RTS, the staff concludes that there are no significant hazards considerations. The replacement of an LCO with more restrictive surveillances to accomplish the objective of monitoring plant status while reducing the risk of accident from an unnecessary plant transient is also involved. Where this type of change occurs in the RTS, the staff determined that there are no significant hazards considerations. This change also involves replacing an action which is not very useful (logging control rod position) with one which addresses the safety concern (power distribution) and which is explicit with its own subsection, "ACTION:". Throughout the RTS

where this type of change in action statement is made, the staff concludes there are no significant hazards considerations because the improved knowledge of plant status that results from the change does 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 staff also notes that this is an example where the surveillance frequency is not critical to safety because of the low rate of equipment failures, and where the test itself adds to the risk of failure. Therefore, the staff concludes that, throughout the RTS, there are no significant hazards considerations associated with relaxing surveillance frequencies of this type.

Example 2: Relaxed action statement within LCO

Section 3.7.2 (pages 3.7-1 and 2) of the CTS requires that four d.c. batteries be maintained in an operable condition. The action required, if one battery is inoperable for more than 24 hours, is to place both reactor units in Hot Standby (mode 3) within 6 hours. The proposed change in Section 3.8.2.1 of the RTS identifies the specific four batteries, and extends the time available to be in Hot Standby to 12 hours. In Appendix A of Attachment II of the Application, pages 3/4 8-11 through 3/4 8-14, the licensee evaluated proposed changes against the three standards of 10 CFR 50.92(c) and concluded there are no significant hazards considerations. The relevant part of the licensee's evaluation is reproduced below.

> The proposed change to relax the action requirements to allow for a sequential unit shutdown if a battery is inoperable does not involve a significant hazards consideration because this change would not:
>
> (a) Involve a significant increase in the probability of or consequences of an accident previously evaluated. The proposed action statement requires within 24 hours of loss of a battery that one of the affected

units be placed in HOT STANDBY within 6 hours followed by immediate shutdown of the other units to HOT STANDBY with the next 6 hours. Both units are required to be placed in COLD SHUTDOWN within 30 hours following achievement of HOT STANDBY. The proposed ACTION statement provides for a more organized method for a dual unit shutdown.

Because the proposed change would allow more preparation time to shutdown the second unit or restore the inoperable DC bus to operable status and as the likelihood of an accident being initiated during this additional short time is remote, this change would not involve a significant increase in the probability of or consequences of an accident previously evaluated.

(b) Create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new mode of plant operation nor involve[s] a physical modification to the plant.

(c) Involve a significant reduction in a margin of safety because the revision allows time to recover the DC bus while shutting down one unit and preparing for an organized shutdown of the other unit. FPL believes the advantages of these operational considerations would increase the margin of safety in the unlikely event that dual unit shutdown is required.

The staff agrees with the licensee's evaluation and conclusions and adds the following comments for clarification. This change is proposed because it is safer to shut down the two Turkey Point units sequentially, rather than simultaneously, from the control room that is common to both units. Because it takes about 6 hours for one Turkey Point unit to reach Hot Standby from full power in an orderly process, 12 hours is needed for two units to reach Hot Standby. The added orderliness of control room activities and reduced transient demand on plant equipment obtained by shutting down only one unit at a time is safer than shutting down both Turkey Point units simultaneously. While this change represents a relaxed requirement on the licensee, the staff believes it is safer for Turkey Point. Also, specific identification of the batteries is a desired clarification.

Example 3: Relaxation of surveillance

In the CTS, Table 4.1-1, item 18B (no page number, but follows page 4.1-1) area radiation monitors are required to be checked daily, tested monthly, and calibrated annually. The proposed change in the RTS would delete this as a TS requirement.

In Appendix A of Attachment II of the Application, page 3/4 3-10, item A.2.c.1, and on pages 3/4 3-11 through 3/4 3-13, the licensee evaluated this change against the three standards of 10 CFR 50.92(c) and determined there is no significant hazards consideration associated with the change. The staff agrees with the licensee's evaluation and conclusion. The staff notes that: (1) these monitors are not used for automatic protection during accidents, (2) other radiation monitors provide indication of an accident by monitoring high radiation in the containment building, reactor coolant, or other process systems, (3) these monitors will be maintained and monitored using plant procedures, and they are backed up by area radiation surveys, and (4) this change is consistent with the STS.

The staff concludes that elimination of surveillances of this type, i.e., those not required to protect the public health and safety, involve no significant hazards considerations because they do 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.

Category 4 - Relocation of requirements to other controlled documents

The only example of relocation of requirements from the CTS to another controlled document is described on page G-1 of Appendix A of Attachment II of the Application. Design requirements involving seven technical areas are proposed to be deleted from the CTS. The licensee has evaluated these deletions against the three criteria of 10 CFR 50.92(c) on page G-4 of Appendix A The staff agrees with the licensee's evaluation. The staff notes that the design requirements to be deleted from the CTS are contained in another controlled document, the Final Safety Analysis Report (FSAR). For example, the first design feature listed on page G-1 of Appendix A of Attachment II of the

Application, "Reactor Coolant System design and maximum potential seismic accelerations (Section 5.2.2 a & b)," is located on page 5.2-1 of the CTS and also on pages 5A-2 and 2.11-2 of the FSAR; the reference is deleted in the RTS. The other six design features are described completely in the FSAR. These design requirements are not used by reactor operators. For example, the design feature cited above (Section 5.2.2 a & b of the CTS) states the horizontal and vertical seismic acceleration limits for which the plant structures and equipment are designed. There are no relevant operating procedures or operating requirements dealing with these seismic accelerations. The accelerations were used to determine necessary structural strength when the plant and equipment were designed and built. Because these design requirements are not used by the operators in their day-to-day operation of the plant, the relocation of this material is not a relaxation of requirements. A similar comment applies to all seven design requirements being relocated to the FSAR. The FSAR is a better place to locate such information. Because there is no change to the plant or its design operating requirements, the relocation of the seven design requirements does 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 three criteria of 10 CFR 50.92 are met, and there are no significant hazards considerations.

Conclusion

Based on the above considerations, the Commission has made a proposed determination that the amendment request involves no significant hazards considerations.

Public Comments

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making the final determination.

Written comments may be submitted by mail to the Regulatory Publications Branch, Division of Freedom of Information and Publications Services, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and should cite the publication date and page number of this FEDERAL REGISTER notice. Written comments may also be delivered to Room P-223, Phillips Building, 7920 Norfolk Avenue, Bethesda, Maryland, from 7:30 a.m. to 4:15 p.m. Copies of written comments received may be examined at the NRC Public Document Room, the Gelman Building, 2120 L Street, N.W., Washington, D.C.

For further details with respect to this action, see the application for amendments dated June 5, 1989, as supplemented November 3, 1989 and May 1, 1990, which is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, N.W., Washington, D.C. 20555 and at the Local Public Document Room located at the Environmental and Urban Affairs Library, Florida International University, Miami, Florida 33199.

Dated at Rockville, Maryland, this 9th day of May 1990.

FOR THE NUCLEAR REGULATORY COMMISSION

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