

1992  
February 7, 1992

Docket Nos. 50-250  
and 50-251

DISTRIBUTION  
See attached sheet

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

Dear Mr. Goldberg:

SUBJECT: TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS RE:  
SNUBBER INSPECTIONS (TAC NOS. M81774 AND M81775)

The Commission has issued the enclosed Amendment No. 151 to Facility Operating License No. DPR-31 and Amendment No. 146 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 September 17, 1991.

These amendments make line-item improvements to the Turkey Point, Unit 3 and Unit 4 Technical Specifications in accordance with Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." Please note that in accordance with Note 1 of Table 4.7-1, the results from the previous inspection performed under the old Technical Specification can be used to determine the next inspection interval.

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

Sincerely,

/s/ by Jan Norris for:  
Rajender Auluck, Sr. Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.151 to DPR-31
2. Amendment No.146 to DPR-41
3. Safety Evaluation

cc w/enclosures:  
See next page

OFC	:LA:PDII-2	:PM:PDII-2	:D:PDII-2	:EMEB	:OGC	:
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DATE	:1/14/92	:1/15/92	:2/07/92	:2/6/92	:1/16/92	:
DOCUMENT NAME: TP3&4.AMD						

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PDR

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Florida Power and Light Company

Turkey Point Plant

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DATED: February 7, 1992

AMENDMENT NO.151 TO FACILITY OPERATING LICENSE NO. DPR-31-TURKEY POINT UNIT 3  
AMENDMENT NO.146 TO FACILITY OPERATING LICENSE NO. DPR-41-TURKEY POINT UNIT 4

Docket File  
NRC & Local PDRs  
PDII-2 Reading  
S. Varga, 14/E/4  
G. Lainas, 14/H/3  
H. Berkow  
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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. 151  
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 September 17, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

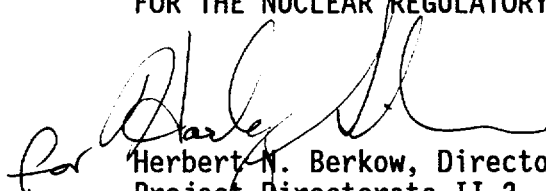
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 151, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "for Herbert N. Berkow", is written over the typed name.

Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 7, 1992



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. 146  
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 September 17, 1991, 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.

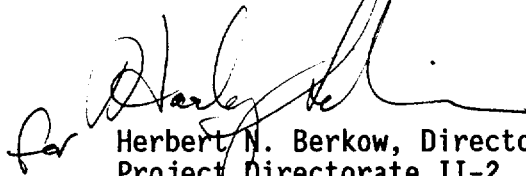
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-41 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No.146 , are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in dark ink, appearing to read "for Herbert N. Berkow", is written over the typed name.

Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 7, 1992

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO.151 TO FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO.146 TO FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages

3/4 7-18

- -

- -

3/4 7-19

Insert pages

3/4 7-18

3/4 7-18a

3/4 7-18b

3/4 7-19



## PLANT SYSTEMS

### 3/4.7.6 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

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 snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.6f. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of Specification 4.0.5.

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 are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 151 and 146.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) the snubber has 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

TABLE 4.7-1

## SNUBBER VISUAL INSPECTION INTERVAL

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extended Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of

unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided 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 4.7.6e. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

#### d. Functional Tests

For each unit during refueling shutdown, a representative sample of snubbers shall be tested using the following sample plan:

- 1) At least 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 4.7.6e, 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 have been functionally tested;
- 2) 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;
  - A. Snubbers within 5 feet of heavy equipment (ex. valves, pumps, turbines, motors, etc.)
  - B. Snubbers within 10 feet of the discharge from a safety relief valve.
- 3) 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.\*

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



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 151 TO FACILITY OPERATING LICENSE NO. DPR-31  
AND AMENDMENT NO. 146 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

1.0 INTRODUCTION

By letter dated September 17, 1991, Florida Power and Light Company (FPL, the licensee) proposed to amend Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Units 3 and 4, respectively. These amendments would remove the present surveillance requirements for snubbers in the Technical Specifications (TS) for both units and replace them with the alternative requirements contained in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

2.0 EVALUATION

The snubber visual examination schedule in the existing TS is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensees with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle, up to 24 months. This interval may be extended to as long as twice the fuel cycle, or reduced to as small as two-thirds of the fuel cycle, depending on the number of unacceptable snubbers found during the visual examination. The examination interval also may vary by  $\pm 25$  percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours or declare the attached system inoperable and follow the appropriate action statement for that system. This LCO will remain

in the TS. However, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (Table 4.7-2 of Generic Letter 90-09 dated December 11, 1990). As noted in the guidance for this line-item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements for corrective actions and evaluations associated with the use of the visual examination schedule and stated in the footnotes 1 through 6 (Table 4.7-2 of Generic Letter 90-09) shall be included in the TS.

The licensee has proposed changes to Specification 3/4.7.6 for Units 3 and 4 that are consistent with the guidance provided in Generic Letter 90-09 for the replacement of the snubber visual examination schedule with Table 4.7-2 (including footnotes 1 through 6) of Generic Letter 90-09. For that reason, and also because the alternative requirements will result in a reduced occupational radiological exposure to the plant personnel, the staff finds the proposed changes acceptable.

### 3.0 STATE CONSULTATION

Based upon the written notice of the proposed amendments, the Florida State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

These amendments change surveillance requirements. The NRC staff has determined that the 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 the amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 55947). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 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.

### 5.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Auluck

Date: February 7, 1992