

April 28, 1994

Docket Nos. 50-250
and 50-251

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:
STEAM GENERATOR OVERFILL PROTECTION (TAC NOS. M88560 AND M88561)

The Commission has issued the enclosed Amendment No. 163 to Facility Operating License No. DPR-31 and Amendment No. 157 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 dated December 28, 1993 to include steam generator overfill protection in TS, as committed to by your letter dated April 9, 1993. This is in response to Generic Letter 89-19, Request for Action Related to Resolution of Unresolved Safety Issue A-47 "Safety Implications of Control Systems in LWR Nuclear Power Plants."

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,

(Original Signed By)
Richard P. Croteau, Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 163 to DPR-31
2. Amendment No. 157 to DPR-41
3. Safety Evaluation

cc w/enclosures:
See next page

Distribution - See next page

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Florida Power and Light Company

Turkey Point Plant

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DATED: April 28, 1994

AMENDMENT NO. 163 TO FACILITY OPERATING LICENSE NO. DPR-31-TURKEY POINT UNIT 3 AMENDMENT
AMENDMENT NO. 157 TO FACILITY OPERATING LICENSE NO. DPR-41-TURKEY POINT UNIT 4

Distribution

Docket File

NRC & Local PDRs

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 163
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 December 28, 1993, 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.

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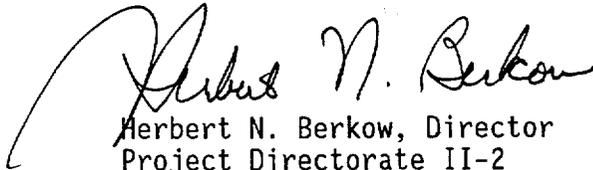
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No.163, 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



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: April 28, 1994



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 157
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 December 28, 1993, 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.

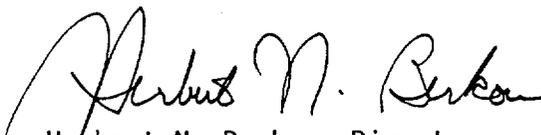
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-41 is hereby amended to read as follows:

(B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 157, 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



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: April 28, 1994

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 163 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 157 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages

3/4 3-18
3/4 3-21
3/4 3-26
3/4 3-33
B 3/4 3-2

Insert pages

3/4 3-18
3/4 3-21
3/4 3-26
3/4 3-33
B 3/4 3-2

TABLE 3.3-2 (Continued)
ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
4. Steam Line Isolation (Continued)					
d. Steam Line Flow--High Coincident with: Steam Generator Pressure--Low	2/steam line	1/steam line in any two steam lines	1/steam line in any two steam lines	1, 2, 3	15
	1/steam generator	1/steam generator in any two steam lines	1/steam generator in any two steam lines	1, 2, 3	15
or T _{avg} --Low	1/Loop	1/loop in any two loops	1/loop in any two loops	1, 2, 3	25
5. Feedwater Isolation					
a. Automatic Actua- tion Logic and Actuation Relays	2	1	2	1, 2	22
b. Safety-Injection	See Item 1. above for all Safety Injection initiating functions and requirements.				
c. Steam Generator Water Level-- High-High####	3/steam generator	2/steam generator in any operating steam generator	2/steam generator in any operating steam generator	1, 2	15
6. Auxiliary Feedwater###					
a. Automatic Actua- tion Logic and Actuation Relays	2	1	2	1, 2, 3	20

TURKEY POINT - UNITS 3 & 4

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AMENDMENT NOS. 163 AND 157

TABLE 3.3-2 (Continued)

TABLE NOTATION

#Trip function may be blocked in this MODE below the Pressurizer Pressure Interlock Setpoint of 2000 psig.

##Channels are for particulate radioactivity and for gaseous radioactivity.

###Auxiliary feedwater manual initiation is included in Specification 3.7.1.2.

####Steam Generator overfill protection is not part of the Engineered Safety Features Actuation System (ESFAS), and is added to the Technical Specifications only in accordance with NRC Generic Letter 89-19.

*Trip function may be blocked in this MODE below the T_{avg} --Low Interlock Setpoint.

**Only during CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION STATEMENTS

- ACTION 14 -** With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1, provided the other channel is OPERABLE.
- ACTION 15 -** With the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST or TRIP ACTUATING DEVICE OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 1 hour.
- ACTION 16 -** With less than the Minimum Channels OPERABLE requirement, comply with the ACTION statement requirements of Specification 3.3.3.1 Item 1a of Table 3.3-4.
- ACTION 17 -** With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM
INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>ALLOWANCE (TA)</u>	<u>Z</u>	<u>S</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE#</u>
4. Steam Line Isolation (Continued)					
b. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	N.A.
c. Containment Pressure--High-High Coincident with: Containment Pressure--High	21.3	2.7	0.0	≤20.0 psig	≤22.6 psig
	13.3	10.3	0.0	≤4.0 psig	≤4.5 psig
d. Steam Line Flow--High	16.7	2.86	3.9	≤A function defined as follows: A Δp corresponding to 40% steam flow at 0% load increasing linearly from 20% load to a value corresponding to 120% steam flow at full load.	≤A function defined as follows: A Δp corresponding to 42.6% steam flow at 0% load increasing linearly from 20% load to a value corresponding to 122.6% steam flow at full load.
Coincident with Steam Line Pressure--Low	13.0	1.16	2.3	≥614 psig	≥588 psig
or T _{avg} --Low	4.0	2.0	1.0	≥543°F	≥542.5°F
5. Feedwater Isolation					
a. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	N.A.
b. Safety Injection	see item 1			See Item 1. above for all Safety Injection Trip Setpoints and Allowable Values.	
c. Steam Generator Water Level High-High	20.0	18.27	2.0	≤80% of narrow range instrument span.	≤81.9% of narrow range instrument span.

TURKEY POINT - UNITS 3 & 4

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AMENDMENT NOS. 163 AND 157

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

<u>CHANNEL FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>ANALOG CHANNEL OPERATIONAL TEST</u>	<u>TRIP ACTUATING DEVICE OPERATIONAL TEST</u>	<u>ACTUATION LOGIC TEST#</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
4. Steam Line Isolation (Continued)						
c. Containment Pressure-- High-High Coincident with: Containment Pressure-- High	N.A.	R	N.A.	R	M(1)	1, 2, 3
d. Steam Line Flow--High Coincident with: Steam Generator Pressure--Low or T _{avg} --Low	S(3)	R	M(5)	N.A.	N.A.	1, 2, 3
	S(3)	R	M(5)	N.A.	N.A.	1, 2, 3
	S(3)	R	Q(5)	N.A.	N.A.	1, 2, 3
5. Feedwater Isolation						
a. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	R	1, 2
b. Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.					
c. Steam Generator Water Level--High-High	S	R	M	N.A.	N.A.	1, 2
6. Auxiliary Feedwater (2)						
a. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	R	1, 2, 3
b. Steam Generator Water Level--Low-Low	S	R	M	N.A.	N.A.	1, 2, 3

TURKEY POINT - UNITS 3 & 4

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AMENDMENT NOS. 163 AND 157

INSTRUMENTATION

BASES

REACTOR TRIP SYSTEM AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION (Continued)

those Engineered Safety Features components whose aggregate function best serves the requirements of the condition. As an example, the following actions may be initiated by the Engineered Safety Features Actuation System to mitigate the consequences of a steam line break or loss-of-coolant accident: (1) Safety Injection pumps start and automatic valves position, (2) Reactor trip, (3) feed water isolation, (4) startup of the emergency diesel generators, (5) containment spray pumps start and automatic valves position (6) containment ventilation isolation, (7) steam line isolation, (8) turbine trip, (9) auxiliary feedwater pumps start and automatic valves position, (10) containment cooling fans start and automatic valves position, (11) intake cooling water and component cooling water pumps start and automatic valves position, and (12) Control Room Isolation and Ventilation Systems start. This system also provides a feedwater system isolation to prevent SG overfill. Steam Generator overfill protection is not part of the Engineered Safety Features Actuation System (ESFAS), and is added to the Technical Specifications only in accordance with NRC Generic Letter 89-19.

The Engineered Safety Features Actuation System interlocks perform the following functions:

HIGH STEAM FLOW SAFETY INJECTION BLOCK - This permissive is used to block the safety injection (SI) signal generated by High Steam Line Flow coincident with Low Steam Line Pressure or Low T_{avg} . The permissive is generated when two out of three Low T_{avg} channels drop below their setpoints and the manual SI Block/Unblock switch is momentarily placed in the block position. This switch is a spring return to the normal position type. The permissive will automatically be defeated if two out of three Low T_{avg} channels rise above their setpoints. The permissive may be manually defeated when two out of three Low T_{avg} channels are below their setpoints and the manual SI Block/Unblock switch is momentarily placed in the unblock position.

LOW PRESSURIZER PRESSURE SAFETY INJECTION BLOCK - This permissive is used to block the safety injection signals generated by Low Pressurizer Pressure and High Differential Pressure between the Steam Line Header and any Steam Line. The permissive is generated when two out of three pressurizer pressure permissive channels drop below their setpoints and the manual SI Block/Unblock switch is momentarily placed in the block position. This is the same switch that is used to manually block the High Steam Flow Safety Injection signals mentioned above. This permissive will automatically be defeated if two out of three pressurizer pressure permissive channels rise above their setpoints. The permissive may be manually defeated when two out of three pressurizer pressure permissive channels are below their setpoints and the manual SI Block/Unblock switch momentarily placed in the Unblock position.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 163 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 157 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNITS 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By Generic Letter (GL) 89-19 dated September 19, 1989, the NRC recommended that a system be provided to mitigate main feedwater overflow events for all pressurized water reactors that currently do not have such protection. This action was part of the technical resolution of Unresolved Safety Issue (USI) A-47, "Safety Implications of Control Systems in LWR Nuclear Power Plants." Furthermore, it was requested that all LWR plants modify their Technical Specifications (TS) to include the operability of the overflow protection systems that are provided in response to the GL on USI A-47.

By letter dated December 20, 1993, Florida Power & Light Company (FPL or the licensee) proposed license amendments to change the TS for the Turkey Point Nuclear Generating Units 3 and 4 (Turkey Point or the facility). The proposed changes would revise the TS to include steam generator (SG) water level high-high protection logic, instrumentation trip setpoints, and surveillance requirements.

There are no physical changes to the plant required as a result of the proposed license amendments. The instrumentation required for the SG Overflow Protection function is currently in place and is in use. This amendment simply formalizes the operability and testing requirements of the overflow protection system and prescribes the required actions if the SG overflow protection function is inoperable.

2.0 BACKGROUND

2.1 Description of the General Protection Requested by GL 89-19.

Overflow protection for each LWR consists of protection channels that initiate the termination of main feedwater flow to the SGs on sensing a high water-level condition. The overflow protection mitigates the consequences of main feedwater control system failures as an event which could lead to overflow conditions, as well as limiting the operating water level to within the bounds of the assumptions used in the safety analysis.

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GL 89-19 requested submittal of license amendments that encompass requirements for Limiting Conditions for Operation (LCO), Setpoints, and Surveillance Requirements which are commensurate with the safety actions required by the existing TS for similar functions.

2.2. Description of the Turkey Point Plant Configuration.

The SG Level Protection Channels I, II and III are designed to combine redundant sensor, independent channel circuitry, coincident trip logic and different parameter measurements so that a safe and reliable system is provided. The SG overflow protection at Turkey Point is initiated on an SG Water Level High-High signal, based on a two-out-of-three initiating logic, which is safety-related. Upon actuation, the system responds by: tripping the main Turbine (reactor trip will occur on a turbine trip); tripping the Main Feedwater (MFW) pumps; initiating feedwater isolation; and shutting the MFW regulating valves and the MFW regulating valve bypass valve. Use of the SG level protection system for the SG Water Level High-High trip is similar to its use for the SG Water Level Low-Low trip. As such, the proposed LCO requirements and surveillance requirements are similar.

As described in the GL, Turkey Point corresponds to a Westinghouse designed PWR Plant of a Group I plant design with a two-out-of-three initiating logic.

3.0 EVALUATION

Per GL 89-19, an acceptable overflow protection system design is one which (a) is separate from the feedwater control system so that it is not powered from the same source, (b) is not located in the same cabinet as the feedwater control system, and (c) the cables are not routed so that a fire is likely to affect both the feedwater control system and the overflow protection system simultaneously. Common-mode failures, however, that could disable overflow protection and the feedwater control system, but would still cause a feedwater pump trip, are considered acceptable failure modes.

Enclosure 2 to GL 89-19 identified different groups of plant designs and provided guidance for acceptable designs. For Westinghouse-designed PWR plants, Group I was designated as plants that have an overflow-protection system initiated on a steam generator high-water-level signal based on two-out-of-four initiating logic which is safety grade, or a two-out-of-three initiating logic which is safety grade but uses one out of the three channels for both control and protection. The system isolates MFW by closing the MFW isolation valves and tripping the MFW pumps. The staff concluded that this type of design was acceptable, provided that

- (1) the overflow protection system is sufficiently separated from the control portion of the MFW control system so that it is not powered from the same power source, not located in the same cabinet, and not routed so that a fire is likely to affect both systems, and
- (2) the plant procedures and TS include requirements to periodically verify operability of this system.

With respect to item (1), the licensee stated the following in the March 19, 1990 response to GL 89-19.

SG level protection channels I, II, III, and IV are designed to combine redundant sensors, independent channel circuitry, coincident trip logic and different parameter measurements so that a safe and reliable system is provided that is single-failure proof.

Channels I and II are used for level protection while channel IV is used for level control. Channel III is used for both protection and control. The SG overfill protection is initiated on a SG High-High level signal, based on a two-out-of-three initiating logic which is safety related.

The SG protection and portions of the control systems utilize shared power sources. However, sufficient power and logic diversity exists to ensure SG overfill protection.

Protection channels (I, II and III) are located in separate analog racks, providing adequate physical protection. The major instruments are arranged to physically separate the protection equipment from the control equipment. Power cable routing was not specifically reviewed but, based on the vintage of the units, there is not reasonable assurance that present day separation criteria were used. However, based on the total system design, FPL believes that adequate protection exists such that the effects of environmental factors including fire, electrical transients, and physical accidents are reduced. Channel III electrical separation between protection and control is achieved by employing isolation amplifiers. Redundant HVAC systems are provided for equipment reliability. Redundant trains "A" and "B" ensure that the feedwater pumps are tripped and that the main and by-pass feedwater control valves are closed in a High-High SG level condition.

With respect to item (2) the licensee stated that the surveillance requirements proposed by this amendment are consistent with the requirements of the SG Water Level Low-Low trip.

Based on the above, the staff considers that the system described and the proposed amendment meets the conditions specified in GL 89-19.

The plant's existing TS for systems that initiate safety actions define requirements which the NRC has previously reviewed and found to be in conformance with the applicable regulatory requirements for TS; namely, those set forth in 10 CFR 50.36 in regard to LCO, Limiting Safety System Settings (Setpoints), and Surveillance Requirements. The proposed TS for the overfill protection system is equivalent to similar existing TS for Auxiliary Feedwater actuation on low-low SG water level. The proposed TSs for the overfill protection system ensure operability of the system at appropriate times, are consistent with existing requirements for systems providing a commensurate level of safety and are, therefore, acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. 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 (59 FR 10007). 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 the amendments.

6.0 CONCLUSION

Based on the staff evaluation in Section 3.0 above, the staff concludes that the proposed Technical Specifications changes are acceptable.

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. Croteau, PD II-2

Date: April 28, 1994