

April 12, 1995

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

SUBJECT: TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS RE:
OPERATION AT REDUCED POWER LEVELS WITH INOPERABLE MSSVs (TAC NOS.
M89935 AND M89934)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment No. 172 to Facility Operating License No. DPR-31 and Amendment No. 166 to Facility Operating License No. DPR-41 for the Turkey Point Plant, Unit Nos. 3 and 4, respectively. The amendments consist of changes to the Technical Specifications (TS) in response to your application dated July 19, 1994, and resubmitted with changes on October 20, 1994, relating to the maximum allowable reactor thermal power operation with inoperable main steam safety valves (MSSVs). You provided additional information by letter dated February 20, 1995.

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-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 172 to DPR-31
2. Amendment No. 166 to DPR-41
3. Safety Evaluation

cc w/enclosures: See next page

FILENAME - G:\TP89934.AMD *Previously concurred

OFFICE	LA:PDII-1	PM:PDII-1	D:PDII-1	OGC*	SRXB*
NAME	Dunnington ^{ETD}	RCroteau ^{AL}	DMatthews	CBarth	BThomas
DATE	4/15/95	4/15/95	4/16/95	03/21/95	03/15/95
COPY	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No

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Mr. J. H. Goldberg
Florida Power and Light Company

Turkey Point Plant
Units 3 and 4

cc:

Harold F. Reis, Esquire
Morgan, Lewis & Bockius
1800 M Street, NW
Washington, DC 20036

Mr. Joe Myers, Director
Division of Emergency Preparedness
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100

Jack Shreve, Public Counsel
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Avenue, Room 812
Tallahassee, Florida 32399-1400

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W. Suite 2900
Atlanta, Georgia 30323

John T. Butler, Esquire
Steel, Hector and Davis
4000 Southeast Financial Center
Miami, Florida 33131-2398

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Mr. Thomas F. Plunkett, Site
Vice President
Turkey Point Nuclear Plant
Florida Power and Light Company
P.O. Box 029100
Miami, Florida 33102

Plant Manager
Turkey Point Nuclear Plant
Florida Power and Light Company
P.O. Box 029100
Miami, Florida 33102

Joaquin Avino
County Manager of Metropolitan
Dade County
111 NW 1st Street, 29th Floor
Miami, Florida 33128

Mr. H. N. Paduano, Manager
Licensing & Special Programs
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

Senior Resident Inspector
Turkey Point Nuclear Generating
Station
U.S. Nuclear Regulatory Commission
P.O. Box 1448
Homestead, Florida 33090

Mr. Edward J. Weinkam
Licensing Manager
Turkey Point Nuclear Plant
P.O. Box 4332
Princeton, Florida 33032-4332

Mr. Bill Passetti
Office of Radiation Control
Department of Health and
Rehabilitative Services
1317 Winewood Blvd.
Tallahassee, Florida 32399-0700

DATED: April 12, 1995

AMENDMENT NO. 172 TO FACILITY OPERATING LICENSE NO. DPR-31-TURKEY POINT UNIT 3
AMENDMENT NO. 166 TO FACILITY OPERATING LICENSE NO. DPR-41-TURKEY POINT UNIT 4

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Docket File

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ACRS (10)

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OC/LFMB

D. Verrelli, R-II

C. Liang

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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. 172
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 July 19, 1994, resubmitted on October 20, 1994, and supplemented on February 20, 1995, 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. 172, 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



David B. Matthews, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 11, 1995



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. 166
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 July 19, 1994, resubmitted on October 20, 1994, and supplemented on February 20, 1995, 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. 166, 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



David B. Matthews, Director
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 11, 1995

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 172 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 166 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages

3/4 7-1
3/4 7-2
B 3/4 7-1
B 3/4 7-2
B 3/4 7-3

Insert pages

3/4 7-1
3/4 7-2
B 3/4 7-1
B 3/4 7-2
B 3/4 7-3

3/4.7 PLANT SYSTEMS

3/4.7.1 TURBINE CYCLE

SAFETY VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.1 All main steam line Code safety valves associated with each steam generator shall be OPERABLE with lift settings as specified in Table 3.7-2.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

With (3) reactor coolant loops and associated steam generators in operation and with one or more main steam line Code safety valves inoperable, and

- a. in MODES 1 and 2, with a positive Moderator Temperature Coefficient, operation may continue provided that, within 4 hours, either the inoperable valve(s) are restored to OPERABLE status or the Power Range Neutron Flux High Trip Setpoint is reduced to the maximum allowable percent of RATED THERMAL POWER listed in Table 3.7-1; otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours, or
- b. in MODES 1 and 2, with a negative or zero Moderator Temperature Coefficient; or in Mode 3, with a positive, negative or zero Moderator Temperature Coefficient, operation may continue provided that, within 4 hours, either the inoperable valve(s) are restored to OPERABLE status or reactor power is reduced to less than or equal to the maximum allowable percent of RATED THERMAL POWER listed in Table 3.7-1; otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.1 No additional requirements other than those required by Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

TABLE 3.7-1

MAXIMUM ALLOWABLE POWER LEVEL WITH
INOPERABLE STEAM LINE SAFETY VALVES DURING THREE LOOP OPERATION

<u>MAXIMUM NUMBER OF INOPERABLE SAFETY VALVES ON ANY OPERATING STEAM GENERATOR</u>	<u>MAXIMUM ALLOWABLE POWER LEVEL (PERCENT OF RATED THERMAL POWER)</u>
1	56
2	35
3	14

TABLE 3.7-2

STEAM LINE SAFETY VALVES PER LOOP

<u>VALVE NUMBER</u>				<u>LIFT SETTING ($\pm 1\%$)*</u>	<u>ORIFICE SIZE SQUARE INCHES</u>
	<u>Loop A</u>	<u>Loop B</u>	<u>Loop C</u>		
1.	RV1400	RV1405	RV1410	1085 psig	16
2.	RV1401	RV1406	RV1411	1100 psig	16
3.	RV1402	RV1407	RV1412	1115 psig	16
4.	RV1403	RV1408	RV1413	1130 psig	16

*The lift setting pressure shall correspond to ambient conditions of the valve at nominal operating temperature and pressure.

BASES

3/4.7.1 TURBINE CYCLE3/4.7.1.1 SAFETY VALVES

The OPERABILITY of the main steam line Code safety valves ensures that the Secondary System pressure will be limited to within 110% (1193.5 psig) of its design pressure of 1085 psig during the most severe anticipated system operational transient. The maximum relieving capacity is associated with a Turbine trip from 100% RATED THERMAL POWER coincident with an assumed loss of condenser heat sink (i.e., no steam bypass to the condenser).

The specified valve lift settings and relieving capacities are in accordance with the requirements of Section VIII of the ASME Boiler and Pressure Code, 1971 Edition. The total relieving capacity for all valves on all of the steam lines is 10,670,000 lbs/h which is 111% of the total secondary steam flow of 9,600,000 lbs/h at 100% RATED THERMAL POWER. A minimum of one OPERABLE safety valves per steam generator ensures that sufficient relieving capacity is available for the allowable THERMAL POWER restriction in Table 3.7-1.

STARTUP and/or POWER OPERATION is allowable with safety valves inoperable within the limitations of the ACTION requirements on the basis of the reduction in Secondary Coolant System steam flow and THERMAL POWER required by the reduced Reactor trip settings of the Power Range Neutron Flux channels. The Reactor Trip Setpoint reductions are derived on the following bases:

$$Hi \phi = \frac{(100/Q) (w_s h_{fg} N)}{K}$$

where:

- Hi ϕ = Reduced THERMAL POWER for the most limiting steam generator expressed as a percent of RTP
- Q = Nominal Nuclear Steam Supply System (NSSS) power rating of the plant (including reactor coolant pump heat), Mwt
- K = Conversion factor; 947.82 (Btu/sec)/Mwt
- w_s = Minimum total steam flow rate capability of the operable MSSVs on any one steam generator at the highest MSSV opening pressure (including tolerance and accumulation) - (Lbm/sec). For example, if the maximum number of inoperable MSSVs on any one steam generator is one, then w_s should be a summation of the capacity of the operable MSSVs at the highest operable MSSV operating pressure, excluding the highest capacity MSSV. If the maximum number of inoperable MSSVs per steam generator is three, then w_s should be a summation of the capacity of the operable MSSV at the highest operable MSSV operating pressure, excluding the three highest capacity MSSVs.
- h_{fg} = Heat of vaporization for steam at the highest MSSV opening pressure (including tolerance and accumulation) - (Btu/lbm)
- N = Number of loops in plant

The values calculated from this algorithm must then be adjusted lower for use in TS 3.7.1.1 to account for instrument and channel uncertainties.

BASES

SAFETY VALVES (Continued)

Operation with less than all four MSSVs OPERABLE for each steam generator is permissible, if THERMAL POWER is proportionally limited to the relief capacity of the remaining MSSVs. This is accomplished by restricting THERMAL POWER so that the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator.

3/4.7.1.2 AUXILIARY FEEDWATER SYSTEM

The OPERABILITY of the Auxiliary Feedwater System ensures that the Reactor Coolant System can be cooled down to less than 350°F from normal operating conditions in the event of a total loss-of-offsite power. Steam can be supplied to the pump turbines from either or both units through redundant steam headers. Two D.C. motor operated valves and one A.C. motor operated valve on each unit isolate the three main steam lines from these headers. Both the D.C. and A.C. motor operated valves are powered from safety-related sources. Auxiliary feedwater can be supplied through redundant lines to the safety-related portions of the main feedwater lines to each of the steam generators. Air operated fail closed flow control valves are provided to modulate the flow to each steam generator. Each steam driven auxiliary feedwater pump has sufficient capacity for single and two unit operation to ensure that adequate feedwater flow is available to remove decay heat and reduce the Reactor Coolant System temperature to less than 350°F when the Residual Heat Removal System may be placed into operation.

ACTION statement 2 describes the actions to be taken when both auxiliary feedwater trains are inoperable. The requirement to verify the availability of both standby feedwater pumps is to be accomplished by verifying that both pumps have successfully passed their monthly surveillance tests within the last surveillance interval. The requirement to complete this action before beginning a unit shutdown is to ensure that an alternate feedwater train is available before putting the affected unit through a transient. If no alternate feedwater trains are available, the affected unit is to stay at the same condition until an auxiliary feedwater train is returned to service, and then invoke ACTION statement 1 for the other train. If both standby feedwater pumps are made available before one auxiliary feedwater train is returned to an OPERABLE status, then the affected unit(s) shall be placed in at least HOT STANDBY within 6 hours and HOT SHUTDOWN within the following 6 hours.

ACTION statement 3 describes the actions to be taken when a single auxiliary feedwater pump is inoperable. The requirement to verify that two independent auxiliary feedwater trains are OPERABLE is to be accomplished by verifying that the requirements for Table 3.7-3 have been successfully met for each train within the last surveillance interval. The provisions of Specification 3.0.4 are not applicable to the third auxiliary feedwater pump provided it has not been inoperable for longer than 30 days. This means that a unit(s) can change OPERATIONAL MODES during a unit(s) heatup with a single auxiliary feedwater pump inoperable as long as the requirements of ACTION statement 3 are satisfied.

The monthly testing of the auxiliary feedwater pumps will verify their operability. Proper functioning of the turbine admission valve and the operation of the pumps will demonstrate the integrity of the system. Verification

BASES

AUXILIARY FEEDWATER SYSTEM (Continued)

of correct operation will be made both from instrumentation within the control room and direct visual observation of the pumps.

3/4.7.1.3 CONDENSATE STORAGE TANK

There are two (2) seismically designed 250,000 gallons condensate storage tanks. A minimum of 185,000 gallons is maintained for each unit in MODES 1, 2 or 3. The OPERABILITY of the condensate storage tank with the minimum water volume ensures that sufficient water is available to maintain the Reactor Coolant System at HOT STANDBY conditions for approximately 23 hours or maintain the Reactor Coolant System at HOT STANDBY conditions for 15 hours and then cool down the Reactor Coolant System to below 350°F at which point the Residual Heat Removal System may be placed in operation.

3/4.7.1.4 SPECIFIC ACTIVITY

The limit on secondary coolant specific activity is based on a postulated release of secondary coolant equivalent to the contents of three steam generators to the atmosphere due to a net load rejection. The limiting dose for this case would result from radioactive iodine in the secondary coolant. One tenth of the iodine in the secondary coolant is assumed to reach the site boundary making allowance for plate-out and retention in water droplets. The inhalation thyroid dose at the site boundary is then;

$$\text{Dose (Rem)} = C * V * B * DFC * X/Q * 0.1$$

- Where: C = secondary coolant dose equivalent I₃-131 specific activity
 = 0.2 curies/m³ (μCi/cc) or 0.1 Ci/m³, each unit
- V = equivalent secondary coolant volume released = 214 m³
- B = breathing rate = 3.47 x 10⁻⁴ m³/sec.
- X/Q = atmospheric dispersion parameter = 1.54 x 10⁻⁴ sec/m³
- 0.1 = equivalent fraction of activity released
- DCF = dose conversion factor, Rem/Ci

The resultant thyroid dose is less than 1.5 Rem.

3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blow down in the event of a steam line rupture. This restriction is required to: (1) minimize the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and (2) limit the pressure rise within containment in the event the steam line rupture occurs within containment. The OPERABILITY of the main steam isolation valves within the closure times of the Surveillance Requirements are consistent with the assumptions used in the safety analyses. The 24-hour action time provides a reasonable amount of time to troubleshoot and repair the backup air and/or nitrogen system.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 172 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 166 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 July 19, 1994, Florida Power and Light Company (FPL or the licensee) requested a revision to the Turkey Point Units 3 and 4 Technical Specifications (TS) to reduce the maximum power level allowed with decreased main steam safety valves (MSSV) relief capacity.

By letter dated January 20, 1994, Westinghouse issued Nuclear Safety Advisory Letter 94-001 (NSAL) which notified the licensee of a deficiency in the basis of the TS 3/4.7.1.1, which allows the plant to operate at reduced power levels with a specified number of MSSVs inoperable. The licensee proposed to amend this section of TS as recommended by Westinghouse to specify the correct maximum allowable reactor thermal power operation with inoperable MSSVs.

The request was modified and resubmitted by letter dated October 20, 1994, primarily to specify the maximum allowable power level with MSSVs inoperable without requiring a reduction of the neutron flux high setpoint trip if the moderator temperature coefficient (MTC) is not positive. This provided closer conformance with the standard TS. Additional information in support of the request is provided by the licensee's letter of February 20, 1995, which did not change the staff's proposed no significant hazards determination.

2.0 DESCRIPTION AND EVALUATION

There are four MSSVs located outside containment on each of the three steam generator main steam lines. The MSSVs discharge to atmosphere and are designed to provide overpressure protection for the secondary system. The MSSVs also provide protection against overpressurizing the reactor coolant pressure boundary by providing a heat sink for the removal of energy from the reactor coolant system if the preferred heat sink, provided by the condenser, is not available.

The events that challenge the relieving capacity of the MSSVs are those characterized as decreased heat removal events, of which loss-of-load/turbine trip (LOL/TT) is the limiting anticipated operational occurrence. This event is analyzed in Chapter 14.1.10 of the Updated Final Safety Analysis Report

(UFSAR). This analysis shows that core protection margins (Departure from Nucleate Boiling Ratio) are maintained, the reactor coolant system (RCS) will not overpressurize, and the main steam system will not overpressurize. The analysis assumes an immediate loss of steam relieving capability through the turbine and coincident loss of all main feedwater. The transient is terminated by a reactor trip on high pressurizer pressure, overtemperature ΔT , or low-low steam generator water level. The transient does not rely on the reduced neutron flux high setpoint currently specified by TS with MSSVs inoperable to terminate the event. However, secondary side overpressure protection is provided by actuation of the MSSVs. The MSSV capacity must be sufficient to prevent secondary side pressure from exceeding 110 percent of the design pressure. The core protection margins are not affected by the deficiency identified in the NSAL. Therefore, only the ability of the MSSVs to prevent exceeding 110 percent of secondary design pressure is affected.

The UFSAR analyzes the LOL/TT transient from the full power initial condition, with cases examining the effects of assuming primary side pressure control and different reactivity feedback conditions. With fully operational MSSVs, secondary system overpressure protection is provided for all initial power levels. With a reduced number of operable MSSVs, secondary overpressure protection is provided by reducing the maximum allowable reactor power level and, therefore, the heat output of the primary system. The power level limits were based on the assumption that the maximum allowable power level was a linear function of the available MSSV relief capacity rather than on a detailed analysis. After further review, Westinghouse determined that under certain conditions and with typical conservative safety analysis assumptions, a LOL/TT transient from reduced power conditions may result in overpressurization of the main steam system when operated in accordance with the current TS. Consequently, the linear function assumption is not valid for all postulated cases.

If main feedwater is lost, a reactor trip is necessary to prevent secondary side overpressurization for all postulated core conditions. At high initial power levels a reactor trip is actuated early in the transient as a result of either high pressurizer pressure or overtemperature ΔT . For Turkey Point, the reactor trip occurs as a result of either the high pressurizer pressure setpoint or low-low steam generator water level setpoint being reached. The reactor trip terminates the transient and the MSSVs maintain steam pressure below 110% of the design value. Therefore, no change is necessary under these conditions.

Westinghouse states in NSAL 94-001, that at lower initial power levels a reactor trip may not be actuated early enough in the transient. An overtemperature ΔT trip is not generated since the core thermal margins are increased at lower power levels. A high pressurizer pressure trip is not generated if the primary pressure control system functions normally. The reactor eventually trips on low steam generator water level, but this may not occur before steam pressure exceeds 110% of the design value if one or more MSSVs are inoperable in accordance with the current TS. This may occur due to the longer time in which primary heat is transferred to the secondary side before the trip.

Westinghouse recommended reducing the maximum power level (heat input from the primary system) allowed for operation with inoperable MSSVs below the heat removing capability of the operable MSSVs. This will prevent exceeding 110% of the design pressure of the secondary system.

2.1 Changes to TSs

The existing TS 3.7.1.1, applicable in modes 1, 2, and 3, required reducing the power range neutron flux high trip setpoint (trip setpoint) to 82%, 54% or 27% for one, two, or three inoperable safety valves, respectively.

The proposed changes to TS primarily involve reducing the allowable power levels with inoperable MSSVs, deleting the requirement to reduce the trip setpoint with a negative or zero MTC, and allowing entry into Mode 3 with inoperable MSSVs by stating that the provisions of TS 4.0.4 are not applicable for entry into Mode 3.

The proposed changes to TSs include reducing the allowable power levels with one, two, or three inoperable safety valves to 56%, 35%, or 14%, respectively. These values are significantly more restrictive than previously required and are based on the Westinghouse algorithm matching the relief capacity with the heat output of the primary system at these power levels. These power levels also reflect a reduction of 5.2% to account for instrument and calibration uncertainties. Additional conservatism exists in these limits since the TS limits power on a per loop (or SG) basis. For example, power would be limited to 56% if there was one of the twelve safety valves inoperable when 56% would prevent exceeding 110% of design pressure if three of the safety valves were inoperable, provided there was no more than one inoperable per loop.

The Westinghouse methodology presented in the NSAL was reviewed by the staff and found to be conservative in preventing exceeding 110% of design pressure. The licensee's calculations and utilization of the NSAL method was reviewed and found to be adequate. The power level limits proposed are acceptable to the staff since they will prevent exceeding 110% of design pressure.

The second major change to TS proposed by the licensee involves deleting the requirement to reduce the trip setpoint to the power level limits in most situations. The trip setpoints will only be required to be reduced by the proposed change if a positive MTC exists and the unit is in Modes 1 or 2. A positive MTC may exist for a few days following some refueling outages. Reducing the trip setpoint with a positive MTC is desirable since a LOL/TT would cause a primary temperature increase and, therefore, reactivity addition with a positive MTC. This reactivity addition would increase the power level above the relief capacity of the MSSVs. By reducing the trip setpoint in this case, the heat input is limited to the relief capacity of the available MSSVs.

When MTC is zero or negative, the increase in primary temperature from the LOL/TT does not add positive reactivity to the core. Core protection margins are maintained and the LOL/TT transient is terminated by a reactor trip on high pressurizer pressure, overtemperature ΔT , or low-low steam generator water level. The transient does not rely on the reduced trip setpoint currently specified by TS with MSSVs inoperable for core protection. Reducing

the power level to the values specified in the proposed TS, in itself, ensures that the available MSSVs will prevent exceeding 110% of the design pressure. Since the MCT is not positive in this case, power level will not increase above that existing at the initiation of the LOL/TT. Since the relief capacity of the remaining MSSVs will be adequate to prevent exceeding 110% of the design pressure in this situation, the staff finds in acceptable.

In Mode 3 the turbine is not parallel to the grid so a LOL/TT event is not credible (turbine is not loaded). Therefore it not necessary to reduce the reactor trip setpoint with MSSVs inoperable in Mode 3. The proposed action statement 3.7.1.1.b is adequate to protect the secondary side from overpressure.

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 relate to changes with respect to 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 amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (59 FR 60380). Accordingly, the amendment meets 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 amendment.

5.0 CONCLUSION

We find the requested changes acceptable since the relief capacity of the remaining MSSVs will be adequate to prevent exceeding 110% of the design pressure. The proposed TS are more conservative than the existing TS. 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 these amendments will not be inimical to the common defense and security or the health and safety of the public.

Principal Contributors: R. Croteau

Date: April 11, 1995