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

TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS RE: ADDITION OF ROD BANK INSERTION LIMITS AND K(Z) CURVE TO CORE OPERATING LIMITS

REPORT (TAC NOS. M89932 AND M89933)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment No. 167 to Facility Operating License No. DPR-31 and Amendment No. 161 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 July 19, 1994, to relocate certain cycle-specific parameter limits from the Technical Specifications to the Core Operating Limits Report. Please note that a listing of individual specifications that address core operating limits was added to TS 6.9.1.7, as agreed to by your staff.

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

Docket Nos. 50-250 and 50-251

Enclosures:

1. Amendment No. 167 to DPR-31 2. Amendment No. 161 to DPR-41

3. Safety Evaluation

cc w/enclosures: See next page

*See previous concurrence

OFFICE	LA:PDII-2	PM:PDII-2	D:PDII-2	SRXB	OGC
NAME	EDunnington	RCroteau (M	VMcCree	RJones*	MYoung*
DATE	10/6/94	10/5/94	10/6/94	8/29/94	9/14/94

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

cc: Harold F. Reis, Esquire Newman and Holtzinger, P.C. 1615 L Street, N.W. Washington, DC 20036

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

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

Mr. Thomas F. Plunkett, Site Vice President 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

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

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

Turkey Point Plant

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

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

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

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

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

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

AMENDMENT NO. 167 TO FACILITY OPERATING LICENSE NO. DPR-31-TURKEY POINT UNIT 3 AMENDMENT NO. 161 TO FACILITY OPERATING LICENSE NO. DPR-41-TURKEY POINT UNIT 4

Distribution Docket File NRC & Local PDRs PDII-2 Reading S. Varga, 14/E/4 D. Matthews E. Dunnington R. Croteau OGC D. Hagan G. Hill (4)
C. Grimes, 11/F/23 ACRS (10) OPA OC/LFDCB D. Verrilli, R-II R. Jones

T. Huang

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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. 167 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, 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.167, 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

Victor M. McCree, Acting Director

Project Directorate N-2

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

Attachment: Changes to the Technical Specifications

Date of Issuance: October 12, 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. 161 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, 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) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 161, 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

Victor M. McCree, Acting 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: October 12, 1994

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 167 FACILITY OPERATING LICENSE NO. DPR-31 AMENDMENT NO. 161 FACILITY OPERATING LICENSE NO. DPR-41 DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages	<u>Insert pages</u>
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V	V
3/4 1-17	3/4 1-17
3/4 1-26	3/4 1-26
3/4 1-27	3/4 1-27
3/4 2-4	3/4 2-4
3/4 2-5	3/4 2-5
3/4 2-7	3/4 2-7
3/4 2-9	3/4 2-9
6-20	6-20
6-21	6-21
B 3/4 1-4	B 3/4 1-4
B 3/4 2-7	B 3/4 2-7

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REACTIVITY CONTROL SYSTEMS

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

GROUP HEIGHT

LIMITING CONDITION FOR OPERATION

3.1.3.1 All full length (shutdown and control) rods shall be OPERABLE and positioned within \pm 12 steps (Analog Rod Position Indication) of the group step counter demand position within one hour after rod motion.

APPLICABILITY: MODES 1* and 2*

ACTION:

- a. With one or more full length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in HOT STANDBY within 6 hours.
- b. With more than one full length rod inoperable or misaligned from the group step counter demand position by more than \pm 12 steps (Analog Rod Position Indication), be in HOT STANDBY within 6 hours.
- c. With one full length rod inoperable due to causes other than addressed by ACTION a, above, or misaligned from its group step counter demand position by more than ± 12 steps (Analog Rod Position Indication), POWER OPERATION may continue provided that within one hour either:
 - 1. The rod is restored to OPERABLE status within the above alignment requirements, or
 - 2. The remainder of the rods in the bank with the inoperable rod are aligned to within ± 12 steps of the inoperable rod while maintaining the rod sequence and insertion limits of Specification 3.1.3.6; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation, or
 - 3. The rod is declared inoperable and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied. POWER OPERATION may then continue provided that:

^{*}See Special Test Exceptions 3.10.2. and 3.10.3.

REACTIVITY CONTROL SYSTEMS

CONTROL ROD INSERTION LIMITS

LIMITING CONDITION FOR OPERATION

3.1.3.6 The control banks shall be limited in physical insertion specified in the Rod Bank Insertion Limits curve, defined in the CORE OPERATING LIMITS REPORT.

APPLICABILITY: MODES 1* and 2* **

ACTION:

With the control banks inserted beyond the above insertion limits, except for surveillance testing pursuant to Specification 4.1.3.1.2 either:

- a. Restore the control banks to within the limits within 2 hours, or
- b. Reduce THERMAL POWER within two hours to less than or equal to that fraction of RATED THERMAL POWER which is allowed by the bank position specified in the Rod Bank Insertion Limits curve, defined in the CORE OPERATING LIMITS REPORT, or
- c. Be in at least HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

4.1.3.6 The position of each control bank shall be determined to be within the insertion limits at least once per 12 hours, except during time intervals when the Rod Insertion Limit Monitor is inoperable, then verify the individual rod positions at least once per 4 hours.

**With Keff greater than or equal to 1.0

^{*}See Special Test Exceptions Specifications 3.10.2 and 3.10.3.

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POWER DISTRIBUTION LIMITS

3/4.2.2 HEAT FLUX HOT CHANNEL FACTOR - F_0 (Z)

LIMITING CONDITION FOR OPERATION

3.2.2 $F_{\mathbb{Q}}^{L}(Z)$ shall be limited by the following relationships:

$$F_{\mathbb{Q}}^{M}(Z) \leq \frac{[F_{\mathbb{Q}}]^{L}X}{P} [K(Z)] \text{ for } P > 0.5$$

$$F_{Q}^{M}(Z) \leq \frac{[F_{Q}]}{0.5}^{L}X [K(Z)] \text{ for } P \leq 0.5$$

where:
$$[F_0]^L = 2.32 \text{ limit}$$

$$P = \frac{\text{Thermal Power}}{\text{Rated Thermal Power}}$$
,

$$[F_0]^M$$
 = The Measured Value, and

K(Z) for a given core height, is specified in the K(Z) curve, defined in the CORE OPERATING LIMITS REPORT.

APPLICABILITY: MODE 1

ACTION:

With the measured value of $F_0^M(Z)$ exceeding its limit:

- a. Reduce THERMAL POWER at least 1% for each 1% $F_Q^M(Z)$ exceeds $F_Q^L(Z)$ within 15 minutes and similarly reduce the Power Range Neutron Flux High Trip Setpoints within the next 4 hours; POWER OPERATION may proceed for up to a total of 72 hours; subsequent POWER OPERATION may proceed provided the Overpower Delta-T Trip Setpoints (value of K_4) have been reduced at least 1% for each 1% $F_Q^M(Z)$ exceeds the $F_Q^L(Z)$; and
- b. Identify and correct the cause of the out-of-limit condition prior to increasing THERMAL POWER above the reduced power limit required by ACTION a., above; THERMAL POWER may then be increased provided

 $F_0^{M}(Z)$ is demonstrated through incore mapping to be within its limit.

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SURVEILLANCE REQUIREMENTS (Continued)

- 2) The following action shall be taken:
 - a) Comply with the requirements of Specification 3.2.2 for $F_0^M(Z)$ exceeding its limit by the percent calculated above.

4.2.2.2 MIDS

Operation is permitted at power above P_T where P_T equals the ratio of $[F_Q]^L$ divided by $[F_Q]^P$ if the following Augmented Surveillance (Movable Incore Detection System, MIDS) requirements are satisfied:

- a. The axial power distribution shall be measured by MIDS when required such that the limit of $[F_Q]^L/P$ times K(Z) is not exceeded. $F_j(Z)$ is the normalized axial power distribution from thimble j at core elevation (Z).
 - 1. If $F_j(Z)$ exceeds $[F_j(Z)]_s^*$ as defined in the bases by $\leq 4\%$, immediately reduce thermal power one percent for every percent by which $[F_j(Z)]_s$ is exceeded.
 - 2. If $F_j(Z)$ exceeds $[F_j(Z)]_S$ by > 4% immediately reduce thermal power below P_T . Corrective action to reduce $F_j(Z)$ below the limit will permit return to thermal power not to exceed current P_I^{**} as defined in the bases.
- b. $F_j(Z)$ shall be determined to be within limits by using MIDS to monitor the thimbles required per Specification 4.2.2.2.c at the following frequencies.
 - At least once every 24 hours, and
 - 2. Immediately following and as a minimum at 2, 4 and 8 hours following the events listed below and every 24 hours thereafter.
 - 1) Raising the thermal power above P_T , or
 - 2) Movement of control-bank D more than an accumulated total of 15 steps in any one direction.
- c. MIDS shall be operable when the thermal power exceeds P_{T} with:
 - 1. At least two thimbles available for which $\overline{\textbf{R}}_j$ and $_j$ as defined in the bases have been determined.

^{*} $[F_j(Z)]_s$ is the alarm setpoint for MIDS ** P_j is reactor thermal power expressed as a fraction of the Rated Thermal Power that is used to calculate $[F_j(Z)]_s$

- c) After 24 hours have elapsed, take a full core flux map to determine $F_Q^M(Z)$ unless a valid full core flux map was taken within the time period specified in 4.2.2.1d.
- d) Calculate P_{RI} per 4.2.2.3b.
- b. Base Load operation is permitted provided:
 - 1. THERMAL POWER is maintained between P_T and P_{BL} or between P_T and 100% (whichever is most limiting).
 - 2. AFD (Delta-I) is maintained within a \pm 2% or \pm 3% target band.
 - 3. Full core flux maps are taken at least once per 31 effective Full Power Days.

 P_{BL} and P_{T} are defined as:

$$P_{BL} = \frac{[F_Q]^L \times K(Z)}{F_Q^M(Z) \times W(Z) BL \times 1.09}$$

$$P_{T} = [F_{0}]^{L}/[F_{0}]^{P}$$

where: $F_Q^M(Z)$ is the measured $F_Q(Z)$ with no allowance for manufacturing tolerances or measurement uncertainty. For the purpose of this Specification $[F_Q^M(Z)]$ shall be obtained between elevations bounded by 10% and 90% of the active core height. $[F_Q]^L$ is the F_Q limit. K(Z) is given in the CORE OPERATING LIMITS REPORT. W(Z) $_{BL}$ is the cycle dependent function that accounts for limited power distribution transients encountered during base load operation.

The function is given in the Peaking Factor Limit Report as per Specification 6.9.1.6. The 9% uncertainty factor accounts for manufacturing tolerance, measurement error, rod bow and any burnup and power dependent peaking factor increases.

- c. During Base Load operation, if the THERMAL POWER is decreased below P_{T} , then the conditions of 4.2.2.3.a shall be satisfied before reentering Base Load operation.
- d. If any of the conditions of 4.2.2.3b are not maintained, reduce THERMAL POWER to less than or equal to P_T , or, within 15 minutes initiate the Augmented Surveillance (MIDS) requirements of 4.2.2.2.

PEAKING FACTOR LIMIT REPORT (Continued)

Factor Limit Report, the Peaking Factor Limit Report shall be provided to the NRC Document Control desk with copies to the Regional Administrator and the Resident Inspector within 30 days of their implementation, unless otherwise approved by the Commission.

The analytical methods used to generate the Peaking Factor limits shall be those previously reviewed and approved by the NRC. If changes to these methods are deemed necessary they will be evaluated in accordance with 10 CFR 50.59 and submitted to the NRC for review and approval prior to their use if the change is determined to involve an unreviewed safety question or if such a change would require amendment of previously submitted documentation.

CORE OPERATING LIMITS REPORT

- 6.9.1.7 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle for the following:
 - 1. Axial Flux Difference for Specification 3.2.1.
 - 2. Control Rod Insertion Limits for Specification 3.1.3.6.
 - 3. Heat Flux Hot Channel Factor $F_0(Z)$ for Specification 3/4.2.2.

The analytical methods used to determine the AFD limits shall be those previously reviewed and approved by the NRC in:

- 1. WCAP-10216-P-A, "RELAXATION OF CONSTANT AXIAL OFFSET CONTROL f_Q SURVEILLANCE TECHNICAL SPECIFICATION," June 1983.
- 2. WCAP-8385, "POWER DISTRIBUTION CONTROL AND LOAD FOLLOWING PROCEDURES TOPICAL REPORT," September 1974.

The analytical methods used to determine the K(Z) curve shall be those previously reviewed and approved by the NRC in:

- 1. WCAP-9220-P-A, Rev. 1, "Westinghouse ECCS Evaluation Model-1981 Version," February 1982.
- WCAP-9561-P-A, ADD. 3, Rev. 1, "BART A-1: A Computer Code for the Best Estimate Analysis of Reflood Transients - Special Report: Thimble Modeling W ECCS Evaluation Model."

The analytical methods used to determine the Rod Bank Insertion Limits shall be those previously reviewed and approved by the NRC in:

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

The AFD, K(Z), and Rod Bank Insertion Limits shall be determined such that all applicable limits of the safety analyses are met. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and the Resident Inspector, unless otherwise approved by the Commission.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report as stated in the Specifications within Sections 3.0, 4.0, or 5.0.

6.10 RECORD RETENTION

- 6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.
- 6.10.2 The following records shall be retained for at least 5 years:
 - a. Records and logs of unit operation covering time interval at each power level;
 - Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
 - c. All REPORTABLE EVENTS;
 - d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;
 - e. Records of changes made to the procedures required by Specification 6.8.1;
 - f. Records of radioactive shipments;
 - g. Records of sealed source and fission detector leak tests and results; and
 - h. Records of annual physical inventory of all sealed source material of record.
- 6.10.3 The following records shall be retained for the duration of the unit Operating License:

BORATION SYSTEMS (Continued)

The charging pumps are demonstrated to be OPERABLE by testing as required by Section XI of the ASME code or by specific surveillance requirements in the specification. These requirements are adequate to determine OPERABILITY because no safety analysis assumption relating to the charging pump performance is more restrictive than these acceptance criteria for the pumps.

The boron concentration of the RWST in conjunction with manual addition of borax ensures that the solution recirculated within containment after a LOCA will be basic. The basic solution minimizes the evolution of iodine and minimizes the effect of chloride and caustic stress corrosion on mechanical systems and components. The temperature requirements for the RWST are based on the containment integrity and large break LOCA analysis assumptions.

The OPERABILITY of one Boron Injection System during REFUELING ensures that this system is available for reactivity control while in MODE 6.

The OPERABILITY requirement of 55°F and corresponding surveillance intervals associated with the boric acid tank system ensures that the solubility of the boron solution will be maintained. The temperature limit of 55°F includes a 5°F margin over the 50°F solubility limit of 3.5 wt.% boric acid. Portable instrumentation may be used to measure the temperature of the rooms containing boric acid sources and flow paths.

(*)One channel of heat tracing is sufficient to maintain the specified temperature limit. Since one channel of heat tracing is sufficient to maintain the specified temperature, operation with one channel out-of-service is permitted for a period of 30 days provided additional temperature surveillance is performed.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that: (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) the potential effects of rod misalignment on associated accident analyses are limited. OPERABILITY of the control rod position indicators is required to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits continue. OPERABLE condition for the analog rod position indicators is defined as being capable of indicating rod position to within ± 12 steps of the demand counter position. For the Shutdown Banks and Control Banks A and B, the Position Indication requirement is defined as the group demand counter indicated position between 0 and 30 steps withdrawn inclusive, and between 200 and 231 steps withdrawn inclusive. This permits the operator to verify that the control rods in these banks are either fully withdrawn or fully inserted, the normal operating modes for these banks. Knowledge of these bank positions in these two areas satisfies all accident analysis assumptions concerning their position. For Control Banks C and D, the Position Indication requirement is defined as the group demand counter indicated position between 0 and 231 steps withdrawn inclusive.

^(*)This is no longer applicable once boric acid tanks inventory and boric acid source and flow path inventories have been diluted to less than or equal to 3.5 weight percent (wt%).

HEAT FLUX HOT CHANNEL FACTOR AND NUCLEAR ENTHALPY RISE HOT CHANNEL FACTOR (Continued)

- b) P_1 is reactor thermal power expressed as a fraction of 1.
- c) K(Z) is the reduction in the F_Q limit as a function of core elevation (Z) as specified in the CORE OPERATING LIMITS REPORT.
- d) $[F_i(Z)]_s$ is the alarm setpoint for MIDS.
- e) R_j , for thimble j, is determined from n=6 incore flux maps covering the full configuration of permissible rod patterns at the thermal power limit of P_T .

$$\overline{R}_{j} = \underbrace{\sum_{i=1}^{n} R_{ij}}_{n}$$

where

$$R_{ij} = \frac{F_{0i} \text{ meas.}}{[F_{ij} (Z)] \text{ max}}$$

and F_{ij} (Z) is the normalized axial distribution at elevation Z from thimble j in map i which has a measure peaking factor without uncertainties or densification allowance of F_{0i} meas.

f) σ_j is the standard deviation, expressed as a fraction or percentage of \overline{R}_j , and is derived from n flux maps and the relationship below, or 0.02 (2%), whichever is greater.

$$\sigma_{\mathbf{j}} = \begin{bmatrix} \frac{1}{n-1} & \sum_{i=1}^{n} (R_{ij} - \overline{R}_{j})^{2} \\ \overline{R}_{j} \end{bmatrix}$$

- g) The factor 1.03 reduction in the kw/ft limit is the engineering uncertainty factor.
- h) The factors $(1+\sigma_j)$ and 1.07 represent the margin between $(F_j(Z)]_L$ limit and the MIDS alarm setpoint $[F_j(Z)]_s$. Since $(1+\sigma_j)$ is bounded by a lower limit of 1.02, there is at least a 9% reduction of the alarm setpoint. Operations are permitted in excess of the operational limit \leq 4% while making power adjustment on a percent for percent basis.



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 167 TO FACILITY OPERATING LICENSE NO. DPR-31

AND AMENDMENT NO. 161 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) proposed changes to the Technical Specifications (TS) for the Turkey Point Plant, Units 3 and 4, to relocate two cycle-specific curves from TS to the Core Operating Limits Report (COLR) in accordance with NRC's Generic Letter (GL) 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications" dated October 4, 1988. TS 6.0 "Administrative Controls" would be revised to reflect the addition of the curves to the COLR. Consistent with the proposed changes, TS would also be revised editorially.

The curves to be relocated include the Rod Bank Insertion Limits versus Thermal Power curve and the K(Z) Normalized $F_Q(Z)$ as a Function of Core Height curve.

2.0 EVALUATION

Amendments 156 and 150 dated November 12, 1993, relocated cycle-specific parameter limits from the TS to the COLR following the guidance of Generic Letter 88-16. This amendment request would relocate additional parameters from TS to the COLR.

The proposed changes to the TS are in accordance with the guidance provided by Generic Letter 88-16 and are addressed below.

- (a) TS Figure 3.1-2, which specifies the Rod Bank Insertion Limits Versus Thermal Power, would be relocated to the COLR. TS 3.1.3.6 would be modified to include appropriate reference to the COLR.
- (b) TS Figure 3.2-2, which specifies K(Z) Normalized $F_0(Z)$ as a Function of Core Height, would be relocated to the COLR. TS 3.2.2, Heat Flux Hot Channel Factor, would be modified to include appropriate reference to the COLR. Other TS references to Figure 3.2-2 would be modified to reference K(Z) and/or the COLR.

(c) TS 6.9.1.7, Core Operating Limits Report, would be modified to specify the following previously NRC-approved analytical methods used to determine the K(Z) curve.

WCAP-9220-P-A, Rev. 1, "Westinghouse ECCS Evaluation Model-1981 Version," February 1982.

WCAP-9561-P-A, ADD. 3, Rev. 1, "BART A-1: A Computer Code for the Best Estimate Analysis of Reflood Transients - Special Report: Thimble Modeling W ECCS Evaluation Model."

TS 6.9.1.7, Core Operating Limits Report, would also be modified to specify the previously NRC-approved analytical methods of WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985, to determine the Rod Bank Insertion Limits. Submittal of the COLR to the NRC would be changed from "30 days after implementation" to "upon issuance." This provides the COLR to the NRC staff at an earlier time.

Other administrative changes are proposed to reflect the above changes to TS. A reference to the individual specifications that are addressed by the COLR was added to TS 6.9.1.7 following discussion with the licensee's staff purely as an administrative aid.

In addition to the above changes, TS Basis 3/4.1.3, Movable Control Assemblies, would be changed to redefine the maximum position indication requirement as the group demand counter indication of "231 steps" rather than the currently specified 228 steps. The full out position will be defined in the Rod Bank Insertion Limit curve which would be relocated to the COLR. As previously stated, this curve is developed using the NRC-approved methodology of WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology" and the full out position could be as much as 231 steps.

The NRC letters approving the WCAP methodologies and finding these WCAPs acceptable for referencing in license applications were as follows:

WCAP 9561, Addendum 3, Revision 1 - Letter dated 8/25/86, Rossi to Rahe WCAP 9273 - Letter dated 5/28/85, Thomas to Rahe WCAP 9220, Revision 1 - Letter dated 12/1/81, Miller to Rahe

On the basis of its review, the NRC staff concludes that the licensee's proposed TS changes to relocate cycle-specific parameter limits to the COLR are consistent with GL 88-16. Because plant operation continues to be limited in accordance with the values of cycle-specific parameter limits that are established using NRC-approved methodologies, the staff finds that the proposed COLR changes are consistent with 10 CFR 50.36 and are acceptable. In addition, the editorial changes and the change to the basis are 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

The amendments involve changes to requirements with respect to 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 39587). The amendments also involve changes to recordkeeping or reporting requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (c)(10). 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.

5.0 CONCLUSION

Based on the staff evaluation in Section 2.0 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.

Principle Contributors: R. Croteau, PD II-2, DRPE T. Huang, SRXB, DE

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