

December 28, 1995

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: EMERGENCY
DIESEL GENERATOR TESTING REQUIREMENTS (TAC NOS. M93582 AND M93583)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment No. 181 to Facility Operating License No. DPR-31 and Amendment No. 175 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 in response to your application dated September 11, 1995, as supplemented by letter dated November 22, 1995, to revise the emergency diesel generator testing requirements to incorporate the recommendations of Generic Letters 93-05 and 94-01.

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

Docket Nos. 50-250
and 50-251

Enclosures:

1. Amendment No. 181 to DPR-31
2. Amendment No. 175 to DPR-41
3. Safety Evaluation

cc w/enclosures: See next page

Distribution - See next page

Document Name: G:TURKEY\TP93582.AMD

OFFICE	LA:PDII-1 <i>ETD</i>	PM:PDII-1	EELB <i>MC</i>	OGC <i>CPW</i>	D:PDII-1 <i>DM</i>	
NAME	EDunnington	Croteau <i>RC</i>	JCalvo		DMatthews	
DATE	11/29/95	11/27/95	11/29/95	11/30/95	12/28/95	
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

cc:

J. R. Newman, Esquire
Morgan, Lewis & Bockius
1800 M Street, N.W.
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. Robert J. Hovey, 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 33023-4332

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

Mr. Kerry Landis
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W. Suite 2900
Atlanta, Georgia 30323-0199

DATED: December 28, 1995

AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-31-TURKEY POINT UNIT 3
AMENDMENT NO. 175 TO FACILITY OPERATING LICENSE NO. DPR-41-TURKEY POINT UNIT 4

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S. Varga

J. Zwolinski

G. Hill, (4) T-5C-3

C. Grimes, 11/F/23

ACRS (4)

K. Landis, RII

DF01/



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. 181
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 11, 1995, as supplemented by letter dated November 22, 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-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. 181, 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 90 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: December 28, 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. 175
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 11, 1995, as supplemented by letter dated November 22, 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. 175, 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 90 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: December 28, 1995

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 181 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 175 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages

3/4 8-2

3/4 8-3

3/4 8-5

3/4 8-9

3/4 8-10

3/4 8-12

B 3/4 8-3

Insert pages

3/4 8-2

3/4 8-3

3/4 8-5

3/4 8-9

3/4 8-10

3/4 8-12

B 3/4 8-3

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one of two startup transformers or an associated circuit inoperable, demonstrate the OPERABILITY of the other startup transformer and its associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Notify the NRC within 24 hours of declaring the transformer inoperable. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit is in MODE 1, reduce THERMAL POWER to $\leq 30\%$ RATED THERMAL POWER within 24 hours, or restore the inoperable startup transformer and associated circuits to OPERABLE status within the next 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. If THERMAL POWER is reduced to $\leq 30\%$ RATED THERMAL POWER within 24 hours or if the inoperable startup transformer is associated with the opposite unit restore the startup transformer and its associated circuits to OPERABLE status within 30 days of the loss of OPERABILITY, or be in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit was in MODE 2, 3, or 4 restore the startup transformer and its associated circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours. This ACTION applies to both units simultaneously.
- b. With one of the required diesel generators inoperable, demonstrate the OPERABILITY of the above required startup transformers and their associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. Restore the inoperable diesel generator to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With one startup transformer and one of the required diesel generators inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a on the remaining

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

startup transformer and associated circuits within one hour and at least once per 8 hours thereafter; and if the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, unless the diesel generators are already operating; restore one of the inoperable sources to OPERABLE status in accordance with Action Statements a and b, as appropriate. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. Notify the NRC within 4 hours of declaring both a start-up transformer and diesel generator inoperable. Restore the other A.C. power source (startup transformer or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 Action Statement a or b, as appropriate, with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable A.C. power source.

- d. With one diesel generator inoperable, in addition to ACTION b. or c. above, verify that:

1. All required systems, subsystems, trains, components, and devices (except safety injection pumps) that depend on the remaining required OPERABLE diesel generators as a source of emergency power are also OPERABLE.

If this condition is not satisfied within 2 hours, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

2. At least two Safety Injection pumps are OPERABLE and capable of being powered from their associated OPERABLE diesel generators.

If this condition is not satisfied within 2 hours, be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours. This ACTION applies to both units simultaneously.

- e. With two of the above required startup transformers or their associated circuits inoperable notify the NRC within 4 hours; restore at least one of the inoperable startup transformers to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours* and in COLD

*If the opposite unit is shutdown first, this time can be extended to 42 hours.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE*:

a. At least once per 31 days on a STAGGERED TEST BASIS by:

- 1) Verifying the fuel volume in the day and skid-mounted fuel tanks (Unit 4-day tank only),
- 2) Verifying the fuel volume in the fuel storage tank,
- 3) Verifying the lubricating oil inventory in storage,
- 4) Verifying the diesel starts and accelerates to reach a generator voltage and frequency of 4160 \pm 420 volts and 60 \pm 1.2 Hz. Once per 184 days, these conditions shall be reached within 15 seconds after the start signal from normal conditions. For all other starts, warmup procedures, such as idling and gradual acceleration as recommended by the manufacturer may be used. The diesel generator shall be started for this test by using one of the following signals:
 - a) Manual, or
 - b) Simulated loss-of-offsite power by itself, or
 - c) Simulated loss-of-offsite power in conjunction with an ESF Actuation test signal, or
 - d) An ESF Actuation test signal by itself.
- 5) Verifying the generator is synchronized, loaded** to 2300 - 2500 kW (Unit 3), 2650-2850 kW (Unit 4)***, operates at this loaded condition for at least 60 minutes and for Unit 3 until automatic transfer of fuel from the day tank to the skid mounted tank is demonstrated, and the cooling system is demonstrated OPERABLE.
- 6) Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.

*All diesel generator starts for the purpose of these surveillances may be preceded by a prelube period as recommended by the manufacturer.

**May include gradual loading as recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized.

***Momentary transients outside these load bands do not invalidate this test.

- h. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting all required diesel generators simultaneously and verifying that all required diesel generators provide 60 ± 1.2 Hz frequency and 4160 ± 420 volts in less than or equal to 15 seconds; and
- i. At least once per 10 years by:
 - 1) Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank.
 - 2) For Unit 4 only, performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda.

4.8.1.1.3 Reports - (Not Used)

TABLE 4.8-1

(Not Used)

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the requirements of Specifications 4.8.1.1.1.a and 4.8.1.1.2 (except for Specification 4.8.1.1.2a.5).

ELECTRICAL POWER SYSTEMS

BASES (Continued)

With one startup transformer and one of the three required EDG's inoperable, the unit with the inoperable transformer must reduce THERMAL POWER to less than or equal to 30% RATED THERMAL POWER within 24 hours, based on the loss of its associated startup transformer, whereas operation of the unit with the OPERABLE transformer is controlled by the limits for inoperability of the EDG. The notification of a loss of startup transformer(s) to the NRC is not a 10 CFR 50.72/50.73 requirement and as such will be made for information purposes only to the NRC Operations Center via commercial lines.

With an EDG out of service, an ACTION statement and a Surveillance Requirement are provided to demonstrate the required startup transformers and their associated circuits are OPERABLE. When one diesel generator is inoperable, there is also an additional ACTION requirement to verify that required system(s), subsystem(s), train(s), component(s), and device(s) that depend on the remaining required OPERABLE diesel generators as a source of emergency power to meet all applicable LCO's, are OPERABLE. This requirement is intended to provide assurance that a loss-of-offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. This requirement allows continued operation to be governed by the time limits of the ACTION statement associated with the inoperable diesel generator. The loss of a diesel generator does not result in the associated system(s), subsystem(s), train(s), component(s), or device(s) being considered inoperable provided: (1) its corresponding normal power source is OPERABLE; and (2) its redundant system(s), subsystem(s), train(s), component(s), and device(s) that depend on the remaining required OPERABLE diesel generators as a source of emergency power to meet all applicable LCO's, are OPERABLE.

All diesel generator inoperabilities must be investigated for common cause failures regardless of how long the diesel generator inoperability persists. When one diesel generator is inoperable, TS 3.8.1.1 ACTION statements b and c provide an allowance to avoid unnecessary testing of other required diesel generators. If it can be determined that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, then SR 4.8.1.1.2a.4 does not have to be performed. Twenty-four (24) hours (or eight (8) hours if both a startup transformer and diesel generator are inoperable) is reasonable to confirm that the remaining required diesel generators are not affected by the same problem as the inoperable diesel generator. If it cannot otherwise be determined that the cause of the initial inoperable diesel generator does not exist on the remaining required diesel generators, then satisfactory performance of SR 4.8.1.1.2a.4 suffices to provide assurance of continued OPERABILITY of the remaining required diesel generators. If the cause of the initial inoperability exists on one or more of the remaining required diesel generators, those diesel generators affected would also be declared inoperable upon discovery, and TS 3.8.1.1 ACTION statement f or TS 3.0.3, as appropriate, would apply.

When in Modes 1, 2, 3 or 4, a unit depends on one EDG and its associated train of busses from the opposite unit in order to satisfy the single active failure criterion for safety injection (SI) pumps and other shared equipment required during a loss-of-coolant accident with a loss-of-offsite power. Therefore, one EDG from the opposite unit is required to be OPERABLE along with the two EDG's associated with the applicable unit.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 175 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 11, 1995, as supplemented by letter dated November 22, 1995, Florida Power and Light Company (FPL or the licensee) proposed a change to the Technical Specifications (TS) for Turkey Point Units 3 and 4. The change consists of revisions to the emergency diesel generator (EDG) testing requirements to incorporate the recommendations of Generic Letters 93-05 and 94-01. By letter dated November 22, 1995, the licensee provided additional information which did not change the staff's proposed no significant hazards consideration.

2.0 BACKGROUND

NUREG-1366 reported the findings and recommendations of a comprehensive examination of surveillance requirements in TS that require testing during power operation. Certain recommendations from this study were intended to remove testing requirements which may be counter-productive to safety in terms of equipment degradation and availability, and were incorporated into the improved Standard Technical Specifications (STS) issued by the NRC in September 1992.

TS currently require testing of EDGs on a periodic basis. In addition, EDG testing is required to prove operability when another EDG or other related equipment (eg. startup transformer) is inoperable. Although this EDG testing provides assurance that the EDGs are operable, the demands of the testing can cause additional wear on the EDG components. Testing performed when there is no reason to doubt EDG operability does not contribute to improved EDG reliability and is considered excessive. Excessive testing is detrimental to the mechanical components and could contribute to an overall reduction in the reliability of an EDG to start and perform its intended function.

Line-Item 10.1 of NUREG-1366 and GL 93-05 recommended improvements to the TS for the EDGs including the following items that the licensee is requesting to incorporate. When an EDG itself is inoperable (not including a support system or independently testable component), the other EDG(s) should be tested once unless the absence of any potential common-mode failure can be demonstrated. In addition, the requirement to test EDGs and other systems which are not associated with an inoperable train or subsystem (other than an inoperable EDG) should be deleted.

GL 94-01 provided guidance for deleting accelerated testing requirements for EDGs provided the provisions of the maintenance rule are implemented for the EDGs. The objective of this change is the prevention of EDG failures through maintenance while minimizing the unavailability due to monitoring or preventive maintenance. In addition, GL 94-01 stated that EDG Special Reporting requirements could be deleted from the plant TS since 10 CFR §50.72 and §50.73 address regulatory requirements for licensees to notify NRC and report individual EDG failures.

3.0 EVALUATION

3.1 Testing of Operable EDGs Due to Other Inoperabilities

TS 3.8.1., "A.C. Sources." The licensee proposed to delete the requirement to test the EDGs due to other inoperabilities (another EDG, startup transformer, etc.) unless there is some reason to question the operability of the EDG (such as a common mode failure). The testing of the EDGs due to the inoperability of other components provided added assurance that the operable EDGs were capable of supplying emergency power if needed.

The licensee stated that the proposed wording has the same meaning as the generic example for this specification provided in GL 93-05, and is consistent with the syntax used in the BASES shown in the improved Standard TS (STS) for Westinghouse Plants (NUREG-1431). Twenty-four hours is allowed to perform testing on the EDGs which differs from the '8 hour' requirement of NUREG-1366 and GL 93-05, but is consistent with GL 84-15 guidance, current Turkey Point TS requirements, and NUREG-1431 requirements. Twenty-four hours provides a reasonable amount of time to perform the required testing, is consistent with the current licensing basis, and is therefore acceptable.

The maintenance and surveillance programs provide assurance that the operable EDGs are capable of performing their intended safety function. The inoperability of other EDGs or systems does not affect the reliability of the operable EDGs unless there is some common mode failure possibility. Conditions which cause the licensee to question the operability of EDGs will require the licensee to test the questionable EDG. This change is consistent with NUREG-1366 and GL 93-05, Item 10.1. For the above reasons, this change is acceptable.

3.2 Deletion of Accelerated Testing

Surveillance requirement (SR) 4.8.1.1.2a. The licensee proposed to revise the frequency of EDG surveillance testing to "At least once per 31 days on a STAGGERED TEST BASIS." The previous testing frequency was based on EDG test failures and required more frequent (accelerated) testing when a number of failures are experienced.

The licensee stated that implementing the provisions of the maintenance rule (10 CFR 50.65) for EDGs and the associated support systems that impact EDG availability will assure acceptable EDG performance. The

licensee committed to implement, within 90 days following issuance of the license amendments, a maintenance program for monitoring and maintaining EDG performance consistent with the provisions of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and the guidance of RG 1.160.

As stated in GL 94-01, "...the staff has concluded that it is not necessary to await the effective date of the maintenance rule to remove the associated TS requirements nor is it necessary to relocate accelerated testing requirements to the maintenance program." The proposed TS change is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.2."

The staff concludes that the proposed change is consistent with GL 94-01. The proposed changes ensure that the EDGs will perform their intended functions by prevention of EDG failures through maintenance and periodic surveillance testing. The staff finds that the proposed changes are acceptable for the reasons specified above.

3.3 Reporting Requirements

The licensee proposed to change TS SR 4.8.1.1.3, "Reports," to delete the specified reporting requirement. This change is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.3." 10 CFR 50.72 and 50.73 adequately address the regulatory requirements for licensees to notify NRC and report individual EDG failures, making this TS unnecessary. The staff finds that the proposed changes are acceptable for the reasons specified above.

3.4 Editorial Changes

The licensee also requested that wording from a current TS footnote be incorporated into the action statement for the appropriate TS sections, thereby eliminating the need for the footnote. Other editorial changes were proposed to correctly implement the technical changes associated with this request. These editorial and administrative changes have no impact on the technical content of the TS, do not affect the health and safety of the public, do not impact the operability of the systems, and are therefore acceptable.

4.0 CONCLUSION

The staff concludes that the proposed TS changes are acceptable since the EDGs will continue to perform their intended functions. EDG failures will be minimized through the maintenance and periodic surveillance testing programs. The proposed changes do not adversely affect plant safety. For these reasons, the staff finds the proposed changes 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.

5.0 STATE CONSULTATION

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

6.0 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 and a change to 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 (60 FR 52930). 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.

Principal Contributor: R. Croteau

Date: December 28, 1995