

August 8, 1995

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: PERIODIC TESTING OF EMERGENCY DIESEL GENERATORS (EDGs) (TAC NOS. M91911 AND M91912)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment No. 175 to Facility Operating License No. DPR-31 and Amendment No. 169 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 March 30, 1995, as modified by letters dated May 5, 1995, and June 19, 1995, relating to separation of the 24-hour EDG test and hot restart test from the loss-of-offsite-power test.

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. 175 to DPR-31
2. Amendment No. 169 to DPR-41
3. Safety Evaluation

cc w/enclosures: See next page

Document Name: G:TURKEY\TP91911.AMD

OFFICE	LA:PDII-1	PM:PDII-1	D:PDII-1	EELB <i>ME</i>	OGC	
NAME	Dunnington*	Croteau <i>RC</i>	Matthews <i>MM</i>	JCalvo	<i>CB</i>	
DATE	6/21/95	6/22/95	7/21/95	6/26/95	6/29/95	
COPY	(Yes) No	(Yes) No	Yes (No)	Yes/No	Yes /No	

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* See previous correspondence.

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DFW

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

Turkey Point Plant
Units 3 and 4

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DATED: August 8, 1995

AMENDMENT NO. 175 TO FACILITY OPERATING LICENSE NO. DPR-31-TURKEY POINT UNIT 3
AMENDMENT NO. 169 TO FACILITY OPERATING LICENSE NO. DPR-41-TURKEY POINT UNIT 4

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Docket File

NRC & Local PDRs

PDII-1 Reading

S. Varga, 14/E/4

D. Hagan, T-4A-43

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

C. Grimes, 11/F/23

ACRS (4)

OPA

OC/LFDCB

K. Landis, R-II



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. 175
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 March 30, 1995, as modified by letters dated May 5, 1995, and June 19, 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. 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 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: August 8, 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. 169
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 March 30, 1995, as modified by letters dated May 5, 1995, and June 19, 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.169 , 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: August 8, 1995

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 175 FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 169 FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages

3/4 8-8
3/4 8-9
B 3/4 8-4
B 3/4 8-4a
B 3/4 8-5

Insert pages

3/4 8-8
3/4 8-9
B 3/4 8-4
B 3/4 8-4a
B 3/4 8-5

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, verify the diesel starts and accelerates to reach a generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz within 15 seconds after the start signal.**

- 8) Verifying that the auto-connected loads to each diesel generator do not exceed 2500 kW (Unit 3), 2874 kW (Unit 4);
- 9) Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
- 10) Verifying that the diesel generator operating in a test mode, connected to its bus, a simulated Safety Injection signal overrides the test mode by: (1) returning the diesel generator to standby operation, and (2) automatically energizing the emergency loads with offsite power;
- 11) Verifying that the fuel transfer pump transfers fuel from the fuel storage tank (Unit 3), fuel storage tanks (Unit 4) to the day tanks of each diesel associated with the unit via the installed cross-connection lines;
- 12) Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within $\pm 10\%$ of its design interval;
- 13) Verifying that the diesel generator lockout relay prevents the diesel generator from starting;

** If verification of the diesel's ability to restart and accelerate to a generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz within 15 seconds following the 24 hour operation test of Specification 4.8.1.1.2.g.7) is not satisfactorily completed, it is not necessary to repeat the 24-hour test. Instead, the diesel generator may be operated between 2300-2500 kW Unit 3, 2650-2850 kW (Unit 4) for 2 hours or until operating temperature has stabilized (whichever is greater). Following the 2 hours/operating temperature stabilization run, the EDG is to be secured and restarted within 5 minutes to confirm its ability to achieve the required voltage and frequency within 15 seconds.

- 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 - All diesel generator failures, valid or nonvalid, shall be reported to the Commission in a Special Report pursuant to Specification 6.9.2 within 30 days. Reports of diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977. If the number of failures in the last 100 valid tests is greater than or equal to 7, the report shall be supplemented to include the additional information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.

BASES (Continued)

With both startup transformers inoperable, the unit(s) are required to be shutdown consecutively, after 24 hours. A consecutive shutdown is used because a unit without its associated transformer must perform a natural circulation cooldown. By placing one unit in COLD SHUTDOWN before starting shutdown of the second unit, a dual unit natural circulation cooldown is avoided.

The term verify means to administratively check by examining logs or other information to determine if required components are out-of-service for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

The EDG Surveillance testing requires that each EDG be started from normal conditions only once per 184 days with no additional warmup procedures. Normal conditions in this instance are defined as the pre-start temperature and lube oil conditions each EDG normally experiences with the continuous use of prelube systems and immersion heaters.

Surveillance Requirement 4.8.1.1.2.g.7) demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal surveillances, and achieve the required voltage and frequency within 15 seconds. The 15 second time is derived from the requirements of the accident analysis to respond to a design large break Loss of Coolant Accident (LOCA). By performing this SR after 24 hours (or after two hours, in accordance with the proposed revised footnote), the test is performed with the diesel sufficiently hot. The load band is provided to avoid routine overloading of the EDG. Routine overloads may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain EDG OPERABILITY. The requirement that the diesel has operated for at least two hours at full load is based on NRC staff guidance for achieving hot conditions. Momentary transients due to changing bus loads do not invalidate this test.

The fuel supply specified for the Unit 3 EDG's is based on the original criteria and design bases used to license the plant. The specified fuel supply will ensure sufficient fuel for either EDG associated with Unit 3 for at least a week. The fuel supply specified for the Unit 4 EDG's is based on the criteria provided in ANSI N195-1976 as endorsed by Regulatory Guide 1.137. The specified fuel supply will ensure sufficient fuel for each EDG associated with Unit 4 for at least a week.

DIESEL FUEL OIL TESTING PROGRAM

In accordance with TS 6.8.4, a diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. For the intent of this specification, new fuel oil shall represent diesel fuel oil that has not been added to the Diesel Fuel Oil Storage Tanks. Once the fuel oil is added to the Diesel Fuel Oil Storage Tanks, the diesel fuel oil is considered stored fuel oil, and shall meet the Technical Specification requirements for stored diesel fuel oil.

The tests listed below are a means of determining whether new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate detrimental impact on diesel engine combustion. If results from these tests are within acceptable limits, the new fuel oil may be added to the storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks. These tests are to be conducted prior to

adding the new fuel to the storage tanks, but in no case is the time between receipt of the new fuel oil and conducting the tests of Surveillance Requirement 4.8.1.1.2e. to exceed 30 days. The tests, limits, and applicable ASTM standards being used to evaluate the condition of new fuel oil are:

1. By obtaining a composite sample of new fuel oil in accordance with ASTM-D4057 prior to addition of new fuel oil to the diesel fuel oil storage tanks and:
2. By verifying in accordance with the tests specified in ASTM-D975-81 prior to addition to the diesel fuel oil storage tanks that the sample has:
 - a) An API Gravity of within 0.3 degrees at 60°F, or a specific gravity of within 0.0016 at 60/60°F, when compared to the supplier's certificate, or an absolute specific gravity at 60/60°F of greater than or equal to 0.83 but less than or equal to 0.89, or an API gravity of greater than or equal to 27 degrees but less than or equal to 39 degrees, when tested in accordance with ASTM-D1298-80;
 - b) A kinematic viscosity at 40°C of greater than or equal to 1.9 centistokes, but less than or equal to 4.1 centistokes (alternatively, Saybolt viscosity, SUS at 100°F of greater than or equal to 32.6, but less than or equal to 40.1), if gravity was not determined by comparison with the supplier's certification;
 - c) A flash point equal to or greater than 125°F; and
 - d) A clear and bright appearance with proper color when tested in accordance with ASTM-D4176-82.

Failure to meet any of the above limits is cause for rejecting the new fuel oil, but does not represent a failure to meet the Limiting Condition for Operation of TS 3.8.1.1, since the new fuel oil has not been added to the diesel fuel oil storage tanks.

Within 30 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM-D975-81 are met when tested in accordance with ASTM-D975-81 except that the analysis for sulfur may be performed in accordance with ASTM-D1552-79 or ASTM-D2622-82. The 30 day period is acceptable because the fuel oil properties of interest, even if they are not within limits, would not have an immediate effect on EDG operation. The diesel fuel oil surveillance in accordance with the Diesel Fuel Oil Testing Program will ensure the availability of high quality diesel fuel oil for the EDGs.

At least once every 31 days, a sample of fuel oil is obtained from the storage tanks in accordance with ASTM-D2276-78. The particulate contamination is verified to be less than 10 mg/liter when checked in accordance with ASTM-D2276-78, Method A. It is acceptable to obtain a field sample for subsequent laboratory testing in lieu of field testing.

Fuel oil degradation during long term storage shows up as an increase in particulate, due mostly to oxidation. The presence of particulate does not mean the fuel oil will not burn properly in a diesel engine. The particulate can cause fouling of filters and fuel oil injection equipment, however, which can cause engine failure.

BASES (Continued)

The frequency for performing surveillance on stored fuel oil is based on stored fuel oil degradation trends which indicate that particulate concentration is unlikely to change significantly between surveillances.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971; 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977; and 1.137, "Fuel-oil Systems for Standby Diesel Generators," Revision 1, October 1979.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that (1) the facility can be maintained in the shutdown or refueling condition for extended time periods, and (2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status. During a unit shutdown, the one required circuit between the offsite transmission network and the onsite Class 1E Distribution System can consist of at least the associated unit startup transformer feeding one 4160 volt Bus A or B, or the opposite unit's startup transformer feeding the associated unit's 4160 volt Bus A, or the associated unit's 4160 volt Bus A or B backfed through its auxiliary transformers with the main generator isolated.

As inoperability of numerous electrical components often affect the operation of the opposite unit, the applicability for the shutdown LIMITING CONDITION FOR OPERATION (LCO) for A.C. Sources, D.C. Sources and Onsite Power Distribution all contain statements to ensure the LCO's of the opposite unit are considered.

The allowable out-of-service time for the D.C. busses is 24 hours with one unit shutdown in order to allow for required battery maintenance without requiring both units to be shutdown. Provisions to substitute the spare battery for any one of the four station batteries have been included to allow for battery maintenance without requiring both units to be shutdown. The requirement to have only one OPERABLE battery charger associated with a required battery bank permits maintenance to be conducted on the redundant battery charger.

A battery charger may be considered acceptable when supplying less than 10 amperes provided:

- 1) The battery charger's ability to independently accept and supply the D.C. bus has been verified within the previous 7 days and
- 2) D.C. output voltage is \geq 129 volts.

The minimum number of battery chargers required to be OPERABLE is based on the following criteria:

- 1) A minimum of one battery charger per bus with each powered from a separate 480 volt MCC is required to satisfy the single failure criteria when assuming the failure of a MCC. This restriction prohibits the use of two chargers powered from the same bus for meeting the minimum requirements.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. _____ TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. _____ 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 March 30, 1995, as modified by letters dated May 5, 1995, and June 19, 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 changes requested involved separation of the 24-hour emergency diesel generator (EDG) run and hot-restart EDG test from the loss-of-offsite power (LOOP) test.

The requested changes would revise TS 4.8.1.1.2.g.7. by eliminating the reference to perform the LOOP test [TS 4.8.1.1.2.g.4(b)] within 5 minutes after completing the 24-hour EDG run and adding the acceptance criteria for hot-restart test following the 24-hour run.

2.0 EVALUATION

Four EDGs supply emergency power at Turkey Point Units 3 and 4. Each EDG is connected to a separate power train, two per unit. With any credible single failure, the EDGs are capable of assuring a safe shutdown of both units with a loss of offsite power concurrent with a maximum hypothetical accident condition in one unit. Each engine has self-contained cooling water and lube oil systems. The surveillance requirements help ensure that the EDGs will operate properly when called upon.

The current TS 4.8.1.1.2.g.7 requires demonstration of EDG hot-restart capability at least once every 18 months by initiating a LOOP test within 5 minutes of completing the 24-hour test run. The licensee has proposed to delete the LOOP test after the 24-hour EDG run and require a simple hot restart of the EDG within 5 minutes of the completion of the 24-hour test run and verify the EDG's ability to achieve rated voltage and frequency within 15 seconds of the start signal. The licensee has stated that separating these tests gives the plant operators added flexibility and prevents critical path complication during the outages. If this change were approved, the 24-hour run and hot-restart could be completed outside of the critical path.

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The proposed hot-restart test would continue to require verification that each EDG starts and operates properly within 5 minutes of a 24-hour run. If the hot-restart test is not satisfactorily completed, retest following a two-hour run or after temperatures have stabilized, whichever is longer, may be performed in place of the 24-hour run. This test would be done at least once per 18 months, with the unit shut down.

The primary purpose of the existing requirement to perform a LOOP test within 5 minutes of completing the 24-hour EDG run is to demonstrate the ability of each EDG to restart shortly after being shut down following prolonged operation (hot conditions or hot-restart).

As discussed in NUREG-1366, Improvements to Technical Specifications Surveillance Requirements, failure to restart when hot, or extended delay in restarting, is typically only experienced with small forced-air-cooled diesel engines which, upon being tripped, undergo a temperature rise transient. The large diesel generators are typically water-cooled and do not experience any significant temperature rise transients during operation or after shutdown. Turkey Point has a self-contained cooling water system for each EDG. NUREG-1366 documents the NRC staff's recommendations that the hot-start test following the 24-hour EDG test should be a simple EDG start test. If the hot-restart test is not performed within the required 5 minutes following the 24-hour EDG test, it should not be necessary to repeat the 24-hour EDG test. The only requirement should be that the hot-restart test is performed within 5 minutes of operating the diesel generator at its continuous rating for 2 hours or until operating temperatures have stabilized. The proposed hot-restart test is consistent with the recommendations of NUREG-1366.

Regulatory Guide 1.9, Revision 3, July 1993, Selection, Design, and Qualification of Diesel-Generator Units Used as Standby (Onsite) Electric Power Systems At Nuclear Power Plants, (RG 1.9) provides guidance acceptable to the NRC staff for complying with the Commission's requirements for EDGs. RG 1.9 guidance for hot-restart testing indicates that EDGs demonstrate hot-restart functional capability at full load temperature conditions by verifying that the EDG starts, and attains the required voltage and frequency within acceptable limits. RG 1.9 does not indicate performance of this test in conjunction with the LOOP test. The proposed amendment is therefore consistent with the staff position in RG 1.9. Requiring a LOOP test in conjunction with a hot-restart imposes a strain on multiple systems/components without measurable benefit.

Satisfactory performance of the proposed TS surveillance tests will adequately demonstrate the ability of each EDG to perform its intended function and is, therefore, acceptable.

3.0 CONCLUSIONS

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.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 35072). 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 Contributors: O. Chopra and R. Croteau

Date: August 8, 1995