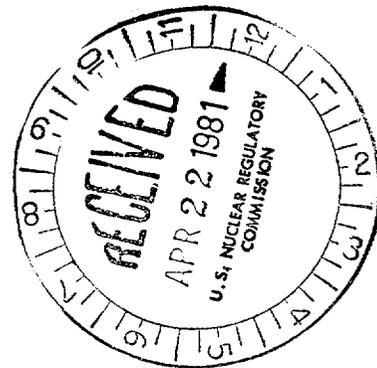


Docket Nos. 50-250
and 80-251

APR 20 1981



Mr. Robert E. Uhrig, Vice President
Advanced Systems and Technology
Florida Power and Light Company
Post Office Box 529100
Miami, Florida 33152

Dear Mr. Uhrig:

**SUBJECT: ORDER FOR MODIFICATION OF LICENSES CONCERNING PRIMARY COOLANT
SYSTEM PRESSURE ISOLATION VALVES**

This letter transmits an Order for Modification of License which revises the Technical Specifications for Facility Operating License No. DPR-31 and DPR-41 for the Turkey Point Plant Unit Nos. 3 and 4. The change is a result of the information you provided in response to our 10 CFR 50.54(f) letter of February 23, 1980, regarding primary coolant system pressure isolation valves. Based upon our review of your response, as well as other previously docketed information, we have concluded that a WASH-1400 Event V valve configuration exists at your facility and that corrective action as defined in the attached Order is necessary.

Attached to the Order for Modification of License is the Technical Specification Report (TER) which supports the Order; and the plant Technical Specifications which will ensure public health and safety over the operating life of your facility. We are aware that there may be editorial corrections to the attached TER. Please note that the Technical Specifications correctly delineate the requirements for your facility.

In addition to Event V valve configurations, we are continuing our efforts to review other configurations located at high pressure/low pressure system boundaries for their potential risk contribution to an intersystem LOCA. Therefore, further activity regarding the broader topic of intersystem LOCA's may be expected in the future.

8104240580*

p

OFFICE ▶							
SURNAME ▶							
DATE ▶							

A copy of the enclosed Order is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by:
S. A. Varga

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
Order for Modification
of Licenses

cc w/enclosure:
See next page

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

April 20, 1981

Docket Nos. 50-250
and 50-251

Mr. Robert E. Uhrig, Vice President
Advanced Systems and Technology
Florida Power and Light Company
Post Office Box 529100
Miami, Florida 33152

Dear Mr. Uhrig:

SUBJECT: ORDER FOR MODIFICATION OF LICENSES CONCERNING PRIMARY COOLANT
SYSTEM PRESSURE ISOLATION VALVES

This letter transmits an Order for Modification of License which revises the Technical Specifications for Facility Operating License No. DPR-31 and DPR-41 for the Turkey Point Plant Unit Nos. 3 and 4. The change is a result of the information you provided in response to our 10 CFR 50.54(f) letter of February 23, 1980, regarding primary coolant system pressure isolation valves. Based upon our review of your response, as well as other previously docketed information, we have concluded that a WASH-1400 Event V valve configuration exists at your facility and that corrective action as defined in the attached Order is necessary.

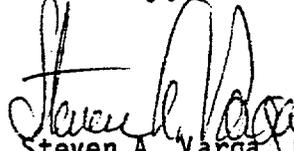
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In addition to Event V valve configurations, we are continuing our efforts to review other configurations located at high pressure/low pressure system boundaries for their potential risk contribution to an intersystem LOCA. Therefore, further activity regarding the broader topic of intersystem LOCA's may be expected in the future.

- 2 -

A copy of the enclosed Order is being filed with the Office of the Federal Register for publication.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steven A. Varga".

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
Order for Modification
of Licenses

cc w/enclosure:
See next page

Robert E. Uhrig
Florida Power and Light Company

cc: Mr. Robert Lowenstein, Esquire
Lowenstein, Newman, Reis and Axelrad
1025 Connecticut Avenue, N.W.
Suite 1214
Washington, D. C. 20036

Environmental and Urban Affairs Library
Florida International University
Miami, Florida 33199

Mr. Norman A. Coll, Esquire
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Bank Building
Miami, Florida 33131

Mr. Henry Yaeger, Plant Manager
Turkey Point Plant
Florida Power and Light Company
P. O. Box 013100
Miami, Florida 33101

Honorable Dewey Knight
County Manager of Metropolitan
Dade County
Miami, Florida 33130

Bureau of Intergovernmental Relations
650 Apalachee Parkway
Tallahassee, Florida 32304

Resident Inspector
Turkey Point Nuclear Generating Station
U. S. Nuclear Regulatory Commission
Post Office Box 1207
Homestead, Florida 33030

Director, Criteria and Standards Division
Office of Radiation Programs (ANR-450)
U. S. Environmental Protection Agency
Washington, D. C. 20460

U. S. Environmental Protection Agency
Region IV Office
ATTN: EIS COORDINATOR
345 Courtland Street, N.W.
Atlanta, Georgia 30308

Mr. Jack Shreve
Office of the Public Counsel
Room 4, Holland Building
Tallahassee, Florida 32304

Administrator
Department of Environmental
Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
Florida Power And Light Company)	
(Turkey Point Plant,)	
Units 3 and 4))	Docket No's. 50-250, 50-251
)	
)	
)	

ORDER FOR MODIFICATION OF LICENSES

I

The Florida Power and Light Company (the licensee) holds Facility Operating License Nos. DPR-31 and DPR-41 which authorizes the licensee to operate the Turkey Point Plant Units 3 and 4 at power levels not in excess of 2200 megawatts thermal rated power. The licenses were originally issued on July 19, 1972 and April 10, 1973 and both will expire on April 27, 2007. The facility, which is located at the licensee's site in Dade County, Florida, is a pressurized water reactor (PWR) used for the commercial generation of electricity.

II

The Reactor Safety Study (RSS), WASH-1400, identified in a PWR an inter-system loss of coolant accident (LOCA) which is a significant contributor to risk of core melt accidents (Event V). The design examined in the RSS contained in-series check valves isolating the high pressure Primary Coolant System (PCS) from the Low Pressure Injection System (LPIS) piping. The scenario which leads to the Event V accident is initiated by the failure of these check valves to function as a pressure isolation barrier. This causes an overpressurization and rupture of the LPIS low pressure piping which results in a LOCA that bypasses containment.

- 2 -

In order to better define the Event V concern, all light water reactor licensees were requested by letter dated February 23, 1980, to provide the following in accordance with 10 CFR 50.54(f):

1. Describe the valve configurations and indicate if an Event V isolation valve configuration exists within the Class I boundary of the high pressure piping connecting PCS piping to low pressure system piping; e.g., (1) two check valves in series, or (2) two check valves in series with a motor operated valve (MOV);
2. If either of the above Event V configurations exist, indicate whether continuous surveillance or periodic tests are being performed on such valves to ensure integrity. Also indicate whether valves have been known, or found, to lack integrity; and
3. If either of the above Event V configurations exist, indicate whether plant procedures should be revised or if plant modifications should be made to increase reliability.

In addition to the above, licensees were asked to perform individual check valve leak testing prior to plant startup after the next scheduled outage.

By letter dated March 17, 1980, the licensee responded to our February letter. Based upon the NRC review of this response as well as the review of previously docketed information for the facility, I have concluded in consonance with the attached Safety Evaluation (Attachment 1) that one or more valve configuration(s) of concern exist at the facility. The attached Technical Evaluation Report (TER) (Attachment 2) provides, in Section 4.0, a tabulation of the subject valves.

- 3 -

The staff's concern has been exacerbated due not only to the large number of plants which have an Event V configuration(s) but also because of recent unsatisfactory operating experience. Specifically, two plants have leak tested check valves with unsatisfactory results. At Davis-Besse, a pressure isolation check valve in the LPIS failed and the ensuing investigation found that valve internals had become disassembled. At the Sequoyah Nuclear Plant, two Residual Heat Removal (RHR) injection check valves and one RHR recirculation check valve failed because valves jammed open against valve over-travel limiters.

It is, therefore, apparent that when pressure isolation is provided by two in-series check valves and when failure of one valve in the pair can go undetected for a substantial length of time, verification of valve integrity is required. Since these valves are important to safety, they should be tested periodically to ensure low probability of gross failure. As a result, I have determined that periodic examination of check valves must be undertaken by the licensee as provided in Section III below to verify that each valve is seated properly and functioning as a pressure isolation device. Such testing will reduce the overall risk of an inter-system LOCA. The testing mandated by this Order may be accomplished by direct volumetric leakage measurement or by other equivalent means capable of demonstrating that leakage limits are not exceeded in accordance with Section 2.2 of the attached TER.

- 4 -

In view of the operating experiences described above and the potential consequences of check valve failure, I have determined that prompt action is necessary to increase the level of assurance that multiple pressure isolation barriers are in place and will remain intact. Therefore, the public health, safety and interest require that this modification of Facility Operating License Nos. DPR-31 and DPR-41 be immediately effective.

III

Accordingly, pursuant to Section 161i of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED THAT EFFECTIVE IMMEDIATELY, Facility Operating License Nos. DPR-31 and DPR-41 is modified by the addition of the following requirements:

1. Implement Technical Specifications (Attachment 3) which require periodic surveillance over the life of the plant and which specify limiting conditions for operation for PCS pressure isolation valves.
2. If check valves have not been (a) individually tested within 12 months preceding the date of the Order, and (b) found to comply with the leakage rate criteria set forth in the Technical Specifications described in Attachment 3, the MOV in each line shall be closed within 30 days of the effective date of this Order and quarterly Inservice Inspection (ISI) MOV cycling ceased until the check valve tests have been satisfactorily accomplished. (Prior to closing the MOV, procedures shall be implemented and operators trained to assure

that the MOV remains closed. Once closed, the MOV shall be tagged closed to further preclude inadvertent valve opening).

3. The MOV shall not be closed as indicated in paragraph 2 above unless a supporting safety evaluation has been prepared. If the MOV is in an emergency core cooling system (ECCS), the safety evaluation shall include a determination as to whether the requirements of 10 CFR 50.46 and Appendix K to 10 CFR Part 50 will continue to be satisfied with the MOV closed. If the MOV is not in an ECCS, the safety evaluation shall include a determination as to whether operation with the MOV closed presents an unreviewed safety question as defined in 10 CFR 50.59(a)(2). If the requirements of 10 CFR 50.46 and Appendix K have not been satisfied, or if an unreviewed safety question exists as defined in 10 CFR 50.59, then the facility shall be shut down within 30 days of the date of this Order and remain shutdown until check valves are satisfactorily tested in accordance with the Technical Specifications set forth in Attachment 3.
4. The records of the check valve tests required by this Order shall be made available for inspection by the NRC's Office of Inspection and Enforcement.

- 6 -

IV

The licensee or any other person who has an interest affected by this Order may request a hearing on this Order within 25 days of its publication in the Federal Register. A request for hearing shall be submitted to the Secretary, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy of the request shall also be sent to the Executive Legal Director at the same address, and to Mr. Robert Lowenstein, Esquire, Lowenstein, Newman, Reis and Axelrad, 1025 Connecticut Avenue, NW, Suite 1214, Washington, DC 20036, attorney for the licensee. If a hearing is requested by a person other than the licensee, that person shall describe, in accordance with 10 CFR 2.714(a)(2), the manner in which his or her interest is affected by this Order. ANY REQUEST FOR A HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

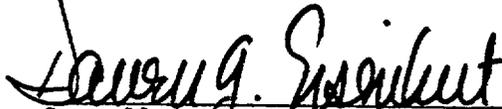
If a hearing is requested by the licensee or other person who has an interest affected by this Order, the Commission will issue an order designating the time and place of any such hearing. If a hearing is held, the issues to be considered at such a hearing shall be:

- (a) Whether the licensee should be required to individually leak test check valves in accordance with the Technical Specifications set forth in Attachment 3 to this Order.
- (b) Whether the actions required by Paragraphs 2 and 3 of Section III of this Order must be taken if check valves have not been tested within 12 months preceding the date of this order.

- 7 -

Operation of the facility on terms consistent with this Order is not stayed by the pendency of any proceedings on this Order. In the event that a need for further action becomes apparent, either in the course of proceedings on this Order or any other time, the Director will take appropriate action.

FOR THE NUCLEAR REGULATORY COMMISSION


Darrell G. Eisenhower, Director
Division of Licensing

Effective Date: April 20, 1981
Bethesda, Maryland

Attachments:

1. Safety Evaluation Report
2. Technical Evaluation Report
3. Technical Specifications



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

Attachment 1

SAFETY EVALUATION REPORT
TURKEY POINT PLANT, UNIT NOS. 3 AND 4
PRIMARY COOLANT SYSTEM PRESSURE ISOLATION VALVES
(WASH-1400, EVENT V)

1.0 Introduction

The Reactor Safety Study (RSS), WASH-1400, identified in a PWR an intersystem loss of coolant accident (LOCA) which is a significant contributor to risk of core melt accidents (Event V). The design examined in the RSS contained in-series check valves isolating the high pressure Primary Coolant System (PCS) from the Low Pressure Injection System (LPIS) piping. The scenario which leads to the Event V accident is initiated by the failure of these check valves to function as a pressure isolation barrier. This causes an overpressurization and rupture of the LPIS low pressure piping which results in a LOCA that bypasses containment.

In order to better define the Event V concern, all light water reactor licensees were requested by 10 CFR 50.54(f) letter, dated February 23, 1980, to identify valve configurations of concern and prior valve test results, if any. By letter dated March 17, 1980, the licensee responded to our request and this information was subsequently transmitted to our contractor, the Franklin Research Center, for verification that the licensee had correctly identified the subject valve configurations.

2.0 Evaluation

In order to prepare the Technical Evaluation Report (TER) it was necessary that the contractor verify and evaluate the licensee's response to our February 1980 letter. The NRC acceptance criteria used by Franklin were based on WASH-1400 findings, probabilistic analyses and appropriate Standard Review Plan requirements. With respect to the verification of the licensee's response to our information request, the Franklin evaluation was based on FSAR information, ISI/IST site visit data, and other previously docketed information. The attached Franklin TER correctly identifies the subject valve configurations.

3.0 Conclusion

Based on our review of the Franklin TER, we find that the valve configurations of concern have been correctly identified. Since periodic testing of these PCS pressure isolation valves will reduce the probability of an intersystem LOCA we, therefore, conclude that the requirement to test these valves should be incorporated into the plant's Technical Specifications.

Dated: April 20, 1981

8104240589

THIS REPORT SUPERSEDES ISSUE OF AUGUST 22, 1980

TECHNICAL EVALUATION REPORT

**PRIMARY COOLANT SYSTEM
PRESSURE ISOLATION VALVES**FLORIDA POWER & LIGHT COMPANY
TURKEY POINT UNITS 3 AND 4

NRC DOCKET NO. 50-250, 50-251

NRC TAC NO. 12940, 12941

NRC CONTRACT NO. NRC-03-79-118

FRC PROJECT C5257

FRC TASK 270, 271

*Prepared by*Franklin Research Center
The Parkway at Twentieth Street
Philadelphia, PA 19103Author: P. N. Noell
T. C. Stilwell
FRC Group Leader: P. N. Noell*Prepared for*Nuclear Regulatory Commission
Washington, D.C. 20555

Lead NRC Engineer: P. J. Polk

October 24, 1980

This report was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, or any of their employees, makes any warranty, expressed or implied, or assumes any legal liability or responsibility for any third party's use, or the results of such use, of any information, apparatus, product or process disclosed in this report, or represents that its use by such third party would not infringe privately owned rights.

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Franklin Research Center

A Division of The Franklin Institute

The Benjamin Franklin Parkway, Phila., Pa. 19103 (215) 448-1000

1.0 INTRODUCTION

The NRC has determined that certain isolation valve configurations in systems connecting the high-pressure Primary Coolant System (PCS) to lower-pressure systems extending outside containment are potentially significant contributors to an intersystem loss-of-coolant accident (LOCA). Such configurations have been found to represent a significant factor in the risk computed for core melt accidents.

The sequence of events leading to the core melt is initiated by the concurrent failure of two in-series check valves to function as a pressure isolation barrier between the high-pressure PCS and a lower-pressure system extending beyond containment. This failure can cause an overpressurization and rupture of the low-pressure system, resulting in a LOCA that bypasses containment.

The NRC has determined that the probability of failure of these check valves as a pressure isolation barrier can be significantly reduced if the pressure at each valve is continuously monitored, or if each valve is periodically inspected by leakage testing, ultrasonic examination, or radiographic inspection. The NRC has established a program to provide increased assurance that such multiple isolation barriers are in place in all operating Light Water Reactor plants designated by DOR Generic Implementation Activity B-45.

In a generic letter of February 23, 1980, the NRC requested all licensees to identify the following valve configurations which may exist in any of their plant systems communicating with the PCS: 1) two check valves in series or 2) two check valves in series with a motor-operated valve (MOV).

For plants in which valve configurations of concern are found to exist, licensees were further requested to indicate: 1) whether, to ensure integrity of the various pressure isolation check valves, continuous surveillance or periodic testing was currently being conducted, 2) whether any check valves of concern were known to lack integrity, and 3) whether plant procedures should be revised or plant modifications be made to increase reliability.

Franklin Research Center (FRC) was requested by the NRC to provide technical assistance to NRC's B-45 activity by reviewing each licensee's submittal

against criteria provided by the NRC and by verifying the licensee's reported findings from plant system drawings. This report documents FRC's technical review.

2.0 CRITERIA

2.1 Identification Criteria

For a piping system to have a valve configuration of concern, the following five items must be fulfilled:

- 1) The high-pressure system must be connected to the Primary Coolant System;
- 2) there must be a high-pressure/low-pressure interface present in the line;
- 3) this same piping must eventually lead outside containment;
- 4) the line must have one of the valve configurations shown in Figure 1; and
- 5) the pipe line must have a diameter greater than 1 inch.

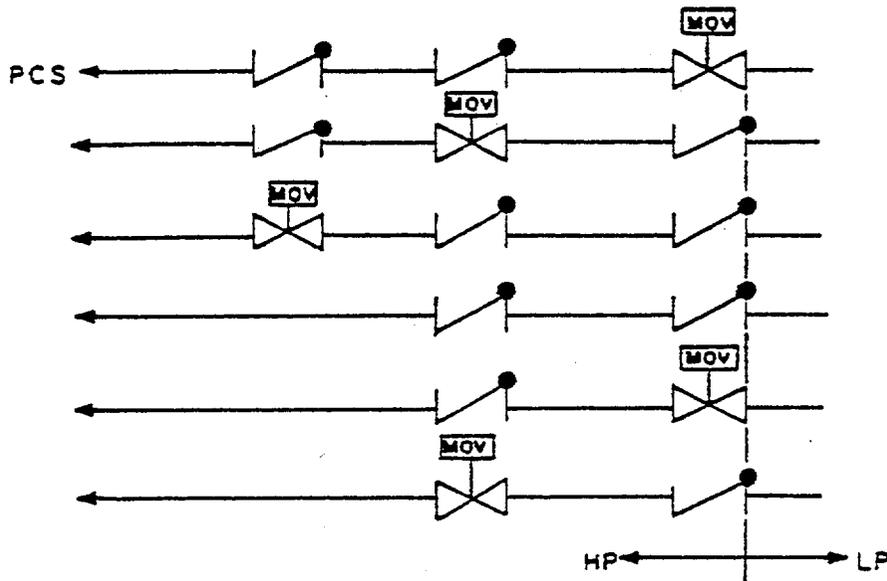


Figure 1. Valve Configurations Designated by the NRC To Be Included in This Technical Evaluation

2.2 Periodic Testing Criteria

For licensees whose plants have valve configurations of concern and choose to institute periodic valve leakage testing, the NRC has established criteria for frequency of testing, test conditions, and acceptable leakage rates. These criteria may be summarized as follows:

2.2.1 Frequency of Testing

Periodic hydrostatic leakage testing* on each check valve shall be accomplished every time the plant is placed in the cold shutdown condition for refueling, each time the plant is placed in a cold shutdown condition for 72 hours if testing has not been accomplished in the preceding 9 months, each time any check valve may have moved from the fully closed position (i.e., any time the differential pressure across the valve is less than 100 psig), and prior to returning the valve to service after maintenance, repair, or replacement work is performed.

2.2.2 Hydrostatic Pressure Criteria

Leakage tests involving pressure differentials lower than function pressure differentials are permitted in those types of valves in which service pressure will tend to diminish the overall leakage channel opening, as by pressing the disk into or onto the seat with greater force. Gate valves, check valves, and globe-type valves, having function pressure differential applied over the seat, are examples of valve applications satisfying this requirement. When leakage tests are made in such cases using pressures lower than function maximum pressure differential, the observed leakage shall be adjusted to function maximum pressure differential value. This adjustment shall be made by calculation appropriate to the test media and the ratio between test and function pressure differential, assuming leakage to be directly proportional to the pressure differential to the one-half power.

2.2.3 Acceptable Leakage Rates:

- Leakage rates less than or equal to 1.0 gpm are considered acceptable.
- Leakage rates greater than 1.0 gpm but less than or equal to 5.0 gpm are considered acceptable if the latest measured rate has not exceeded the rate determined by the previous test by an amount

*To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater.

- Leakage rates greater than 1.0 gpm but less than or equal to 5.0 gpm are considered unacceptable if the latest measured rate exceeded the rate determined by the previous test by an amount that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater.
- Leakage rates greater than 5.0 gpm are considered unacceptable.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Response to the Generic Letter

In response to the NRC's generic letter [Ref. 1], the Florida Power & Light Company (FPL) submitted [Ref. 2] two simplified flow diagrams showing the valve configurations of concern for Turkey Point Units 3 and 4.

The Licensee indicated in Reference 2 that specific surveillance tests to assess check valve status are not being performed on check valves in the various configurations of concern. Also, FPL's operating records covering the past 5 years have not indicated problems with these same check valves.

It is FRC's understanding that, with FPL's concurrence, the NRC will direct FPL to change its Plant Technical Specifications as necessary to ensure that periodic leakage testing (or equivalent testing) is conducted in accordance with the criteria of Section 2.2.

3.2 FRC Review of Licensee's Response

FRC has reviewed the licensee's response against the plant-specific Piping and Instrumentation Diagrams (P&IDs) [Ref. 3] that might have the valve configurations of concern.

FRC has also reviewed the efficacy of instituting periodic testing for the check valves involved in this particular application with respect to the reduction of the probability of an intersystem LOCA in the High-Head Safety Injection System and the Residual Heat Removal System (low-head system) piping lines.

In its review of the P&IDs [Ref. 3] for the Turkey Point Units 3 and 4, FRC found the following two piping systems to be of concern:

The High-Head Safety Injection System is connected to the hot-leg sides of two PCS loops (A and B) and also to the cold-leg side of all three PCS loops (A, B, and C). This system was examined for valve configurations of concern since the piping system is designed to an intermediate pressure level (1500 psig) which is lower than full reactor pressure. Each hot leg branch of the High-Head Safety Injection System has a single check valve and a motor-operated valve in one of the series configurations of concern. For the cold-leg branches of the High-Head Safety System, the two check valves and motor-operated valve in-series comprise the configuration of concern.

The second system of concern is the Residual Heat Removal System. This low-head injection system is connected to the cold legs of all three primary coolant loops in a two check valve and a single motor-operated valve configuration.

In both the High-Head Injection and the Residual Heat Removal systems the high-pressure/low-pressure interface exists at the upstream side of the motor-operated valves (MOVs). The valve configurations of concern for both previously mentioned systems are listed below for Turkey Point Units 3 and 4:

High-Head Safety Injection System

Loop A, hot leg

high-pressure check valve, 874A
high-pressure MOV, 866A, normally closed (n.c.)

Loop B, hot leg

high-pressure check valve, 874B
high-pressure MOV, 866B, n.c.

Loop A, cold leg

high-pressure check valve, 875A
high-pressure gate valve, 868A, normally open (n.o.)
high-pressure check valve, 873A
high-pressure MOVs, 843A and B in parallel, n.c.

Loop B, cold leg

high-pressure check valve, 875B
high-pressure gate valve, 868B, n.o.
high-pressure check valve, 873B
high-pressure MOVs, 843A and B in parallel, n.c.

Loop C, cold leg

high-pressure check valve, 875C
high-pressure gate valve, 868C, n.o.
high-pressure check valve, 873C
high-pressure MOVs, 843A and B in parallel, n.c.

Residual Heat Removal System

Turkey Point Unit 3

Loop A, cold leg

high-pressure check valve, 875A
high-pressure check valve, 876A
high-pressure MOV, 744A, n.c.

Loop B, cold leg

Branch 1

high-pressure check valve, 875B
high-pressure check valve, 876B
high-pressure MOV, 744B, n.c.

Branch 2

high-pressure check valve, 875B
high-pressure check valve, 876D
high-pressure MOV, 872, n.c.

Loop C, cold leg

high-pressure check valve, 875C
high-pressure check valve, 876C
high-pressure MOV, 744B, n.c.

Turkey Point Unit 4

Loop A, cold leg

Branch 1

high-pressure check valve, 875A

high-pressure check valve, 876A

high-pressure MOV, 744A, n.c.

Branch 2

high-pressure check valve, 875A

high-pressure check valve, 876E

high-pressure MOV, 872, n.c.

Loop B, cold leg

Branch 1

high-pressure check valve, 875B

high-pressure check valve, 876B

high-pressure MOV, 744A and B, n.c., in parallel

Branch 2

high-pressure check valve, 875B

high-pressure check valve, 876D

high-pressure MOV, 872, n.c.

Loop C, cold leg

high-pressure check valve, 875C

high-pressure check valve, 876C

high-pressure MOV, 744B, n.c.

In accordance with the criteria of Section 2.0, FRC has found no other valve configurations of concern existing in this plant. These findings confirm the licensee's response [Ref. 2].

FRC reviewed the effectiveness of instituting periodic leakage testing of the check valves in these lines as a means of reducing the probability of an intersystem LOCA occurring. FRC found that introducing a program of check valve leakage testing in accordance with the criteria summarized in Section 2.0 will be an effective measure in substantially reducing the probability of an intersystem LOCA occurring in these lines, and a means of increasing the probability that these lines will be able to perform their safety-related functions. It is also a step toward achieving a corresponding reduction in

the plant probability of an intersystem LOCA in the Turkey Point Units 3 and 4.

4.0 CONCLUSION

Turkey Point Units 3 and 4 has been determined to have valves in two of the configurations of concern having (1) a two check valve and single MOV in-series configuration in the cold leg branches of the High-Head Injection and Residual Heat Removal Systems, and (2) a single check valve, MOV in-series configuration in the two hot leg branches of the High-Head Safety Injection System.

If FPL modifies the Plant Technical Specification for Turkey Point Units 3 and 4 to incorporate periodic testing (as delineated in Section 2.2) for the check valves itemized in Table 1.0, then FRC considers this an acceptable means of achieving plant compliance with the NRC staff objectives of Reference 1.

Table 1.0

Primary Coolant System Pressure Isolation Valves

<u>System</u>	<u>Check Valve No.</u>		<u>Allowable Leakage*</u>
	Unit 3	Unit 4	
High-Head Safety Injection			
Loop A, hot leg	3-874A	4-874A	
cold leg	3-875A	4-875A	
cold leg	3-873A	4-873A	
Loop B, hot leg	3-874B	4-874B	
cold leg	3-875B	4-875A	
cold leg	3-873B	4-873B	
Loop C, cold leg	3-875C	4-875C	
cold leg	3-873C	4-873C	
Residual Heat Removal			
Loop A, cold leg	3-876A	4-876A 4-876E	

*To be provided by licensee at a future date in accordance with Section 2.2.3.

Loop B, cold leg	3-876B	4-876B
	3-876D	4-876D
Loop C, cold leg	3-876C	4-876C

5.0 REFERENCES

- [1]. Generic NRC letter, dated 2/23/80, from Mr. D. G. Eisenhut, Department of Operating Reactors (DOR), to Mr. R. E. Uhrig, Florida Power & Light Company (FPL).
- [2]. Florida Power & Light Company's response to NRC's letter, dated 3/17/80, from Mr. R. E. Uhrig (FPL) to Mr. D. G. Eisenhut (DOR).
- [3]. List of examined P&IDs:

FSAR Drawings of Turkey Point Units 3 and 4:

- Fig. 4.2-1, (Rev. 30)
- Fig. 6.2-1, (Rev. 33)
- Fig. 9.2-1, (Rev. 33) sh. 1
- Fig. 9.2-2, (Rev. 30) sh. 2
- Fig. 9.2-3, (Rev. 30) sh. 3
- Fig. 9.3-1a, (Rev. 33) sh. 1
- Fig. 9.3-1b, (Rev. 33) sh. 2
- Fig. 9.3-2, (Rev. 33)
- Fig. 9.3-3, (Rev. 33)
- Fig. 9.4-1, (Rev. 33)

TECHNICAL SPECIFICATION CHANGES

Remove Pages

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3.16-1
3.16-2
4.17-1
4.17-2

3.16 REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES

Applicability: Applies to the operational status of the reactor coolant system pressure isolation valves listed in Table 3.16-1.

Objective: To define the limiting conditions for operation applied to the reactor coolant system pressure isolation valves listed in Table 3.16-1.

Specification:

1. Leakage from the reactor coolant system pressure isolation valves listed in Table 3.16-1 shall be within the limits specified in Table 3.16-1 except as specified in 3.16-2 below.
2. If one or more of the reactor coolant pressure isolation valves listed in Table 3.16-1 leaks greater than the limits specified in Table 3.16-1 reactor power operation may continue, provided:
 - a. valve leakage is less than the maximum allowable amount specified in Table 3.16-1;
 - b. that at least two valves in each high pressure line having a non-functional valve are in, and remain in, the mode corresponding to the isolated condition, i.e., manual valves shall be locked in the closed position; motor operated valves shall be placed in the closed position and power supplies deenergized; and;
 - c. the requirements of Surveillance Specification 4.17.2 are met.
3. Compliance with specification 3.16.1 and 3.16.2 above is demonstrated by verifying the surveillance requirements of 4.17.1 and 4.17.2 are met.
4. If the requirements of specification 3.16-1 and 3.16-2 above cannot be met within 6 hours, an orderly shutdown shall be initiated and the reactor shall be in the hot shutdown condition within 6 hours and in the cold shutdown condition within the following 30 hours.

TABLE 3.16-1

PRIMARY COOLANT SYSTEM PRESSURE ISOLATION VALVES

<u>System</u>	<u>Valve No.</u>		<u>Maximum (a) (b) Allowable Leakage</u>
High-Head Safety Injection	Unit 3	Unit 4	5.0 gpm
Loop A, hot leg	3-874A	4-874A	5.0 gpm
cold leg	3-875A	4-875A	5.0 gpm
cold leg	3-873A	4-873A	5.0 gpm
Loop B, hot leg	3-874B	4-874B	5.0 gpm
cold leg	3-875B	4-875B	5.0 gpm
cold leg	3-873B	4-873B	5.0 gpm
Loop C, cold leg	3-875B	4-875C	5.0 gpm
cold leg	3-873C	4-873C	5.0 gpm
Residual Heat Removal			
Loop A, cold leg	3-876A	4-876A 4-876E	5.0 gpm 5.0 gpm
Loop B, cold leg	3-876A 3-876D	4-876B 4-876D	5.0 gpm 5.0 gpm
Loop C, cold leg	3-876C 3-876E	4-876C	5.0 gpm 5.0 gpm

- (a)
1. Leakage rates less than or equal to 1.0 gpm are considered acceptable.
 2. Leakage rates greater than 1.0 gpm but less than or equal to 5.0 gpm are considered acceptable if the latest measured rate has not exceeded the rate determined by the previous test by an amount that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater.
 3. Leakage rates greater than 1.0 gpm but less than or equal to 5.0 gpm are considered unacceptable if the latest measured rate exceeded the rate determined by the previous test by an amount that reduces the margin between measured leakage rate and the maximum permissible rate of 5.0 gpm by 50% or greater.
 4. Leakage rates greater than 5.0 gpm are considered unacceptable.
- (b) Minimum differential test pressure shall not be less than 150 psid.

4.17 REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES

Applicability: Applies to the periodic surveillance of the reactor coolant system pressure isolation valves listed in Table 3.16-1.

Objective: To verify that leakage from the reactor coolant system pressure isolation valves listed in Table 3.16-1 is within the limits specified.

Specification:

1. Periodic leakage testing^(a) prior to exceeding 2% power operation to verify that leakage from the reactor coolant system pressure isolation valves listed in Table 3.16-1 is within the limits specified:
 - a. After the unit has been placed in the cold shutdown condition for 72 hours or more, if testing has not been accomplished in the preceding 9 months,
 - b. After the unit has been placed in the refueling shutdown condition, or
 - c. Prior to returning the valve to service after maintenance, repairs or replacement work is performed..

^(a) To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.

2. Whenever the leakage from a reactor coolant system pressure isolation valve listed in Table 3.16-1 is greater than the allowable amount specified in Table 3.16-1, leakage from the remaining reactor coolant system pressure isolation valves listed in Table 3.16-1 shall be determined and recorded daily. In addition, the position of the other valve(s) located in the high pressure piping shall be recorded daily.