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Posted Am 77 to DPR-41

Docket Nos. 50-250
50-251

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

Dear Dr. Uhrig:

The Commission has issued the enclosed Amendment No. 83 to Facility Operating License No. DPR-31 and Amendment No. 77 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 transmitted by letter dated January 18, 1982.

These amendments update the Technical Specifications for the containment and control room filter systems which are part of the engineered safety features of the plant.

During our review we found it necessary to make a change in your amendment request. We have discussed the change with your staff. They agreed to the changes which have been incorporated.

Copies of the Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

ORIGINAL SIGNED

Marshall Grotenhuis, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:
1. Amendment No. 83 to DPR-31
2 Amendment No. 77 to DPR-41
3. Safety Evaluation
4. Notice of Issuance

cc w/encls:
See next page

OFFICE	DL:ORB#1	DL:ORB#1	DL:ORB#1	DL:OR	OELD		
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DATE	3/30/82	3/1/82	3/1/82	3/3/82	4/5/82		

NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO: 1981—335-9

Robert E. Uhrig
Florida Power and Light Company

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

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 83
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 January 18, 1982, 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

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 83 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 9, 1982

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

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 77
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 January 18, 1982, 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

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 77 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 9, 1982

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 83 TO FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 77 TO FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove Pages	Insert Pages
3.0.1	3.0.1
3.4-4	3.4-4
3.4-5	3.4-5
3.4-6	3.4-6
4.7-1	4.7-1
4.7-2	4.7-2
--	4.7-3
--	4.7-4
B4.7-1	B4.7-1

3.0 LIMITING CONDTIONS FOR OPERATION

Applicability

3.0.1 If one of the below listed limiting conditions for operation can not be satisfied because fewer components are operable than are required, the unit shall be placed in hot shutdown within seven hours and cold shutdown within the following 30 hours unless appropriate corrective action is taken before the time expires. This specification applies only to specifications 3.3.1, 3.4.1.b, 3.4.2.b, 3.4.3.b, 3.4.4.b, 3.4.5.b, 3.4.6.b, 3.4.7.b, 3.5, 3.6.d, 3.7.2 and 3.13.3.

3.0.2 For purposes of determining if a component is operable for LCO considerations, the component need not be considered inoperable due to inoperability of its normal or emergency power supply if all of its redundant components are operable with their normal or emergency power supplies operable.

1. ONE emergency containment cooling unit may be out of service for a period of 24 hours. Prior to initiating maintenance the other TWO units shall be tested to demonstrate operability.

2. ONE containment spray pump may be out of service provided it is restored to operable status within 24 hours. The remaining containment spray pump shall be tested to demonstrate operability before initiating maintenance of the inoperable pump.

3. Any valve in the system may be inoperable provided repairs are completed within 24 hours. Prior to initiating repairs, all valves that provide the duplicate function shall be tested to demonstrate operability.

3. EMERGENCY CONTAINMENT FILTERING SYSTEM

a. The reactor shall not be made critical, except for low power physics tests unless:

1. THREE emergency containment filtering units are operable.

2. All valves, interlocks and piping associated with the above components and required for post-accident operation, are operable.

b. During power operation:

1. ONE unit may be inoperable for a period of 7 days if the other TWO are operable.

2. Any valve in the system may be inoperable provided repairs are completed within 7 days. Prior to initiating maintenance, all valves that provide the duplicate function shall be tested to demonstrate operability.

3. If after 7 days the unit is still inoperable Specification 3.0.1 applies to 3.4.3.b.

4. COMPONENT COOLING SYSTEM

a. The reactor shall not be made critical, except for low power physics tests, unless the following conditions are met:

1. THREE component cooling pumps are operable.

2. THREE component cooling heat exchangers are operable.

3. All valves, interlocks and piping associated with the above components are operable.

b. During power operation, the requirements of 3.4.4.a may be modified as stated below. If the system is not restored to meet the conditions of 3.4.4.a within the time period specified, the reactor shall be placed in the hot shutdown condition. If the requirements of 3.4.4.a are not satisfied within an additional 48 hours, the reactor shall be placed in the cold shutdown condition. Specification 3.0.1 applies to 3.4.4.b.

1. ONE pump may be out of service for 7 days.

2. ONE additional pump and ONE heat exchanger may be out of service for period of 24 hours.

5. INTAKE COOLING WATER SYSTEM

a. The reactor shall not be made critical unless the following conditions are met:

1. THREE intake cooling water pumps and TWO headers are operable.

2. All valves, interlocks and piping associated with the operation of these pumps, and required for post accident operation, are operable.

b. During power operation, the requirements of 3.4.5.a., above, may be modified to allow any one of the following components to be inoperable provided the remaining systems are in continuous operation. If the system is not restored to meet the requirements of 3.4.5.a. within the time period specified, the reactor shall be placed in the hot shutdown condition. If the requirements of 3.4.5.a are not satisfied within an additional 48 hours, the reactor shall be placed in the cold shutdown condition. Specification 3.0.1 applies to 3.4.5.b.

1. One of the two headers may be out of service for a period of 24 hours.

2. One intake cooling water pump may be out of service for a period of 24 hours.

6. POST ACCIDENT CONTAINMENT VENT SYSTEM

a. The reactor shall not be made critical, except for low power physics tests unless:

1. The post accident containment vent system is operable.

2. All valves, interlocks, and piping associated with the above components and required for post-accident operation are operable.

b. During power operation:

1. The unit may be inoperable for a period of 7 days.

2. Any valve in the system may be inoperable provided repairs are completed within 7 days. Prior to initiating maintenance, all valves that provide the duplicate function shall be tested to demonstrate operability.

3. If after 7 days the unit is still inoperable, Specification 3.0.1 applies to 3.4.6.b.

7. CONTROL ROOM VENTILATION

a. The reactor shall not be made critical, except for low power physics tests unless.

1. The control room ventilation system is operable.

2. All valves, interlocks, and piping associated with the above components and required for post-accident operation are operable.

b. During power operation:

1. The unit may be inoperable for a period of 3 1/2 days.

2. Any valve in the system may be inoperable provided repairs are completed within 3 1/2 days. Prior to initiating maintenance, all valves that provide the duplicate function shall be tested to demonstrate operability.

3. If after 3 1/2 days the unit is still inoperable, Specification 3.0.1 applies to 3.4.7.b.

4.7 EMERGENCY CONTAINMENT FILTER SYSTEM, POST ACCIDENT CONTAINMENT VENT SYSTEM, AND CONTROL ROOM VENTILATION SYSTEM.

Applicability: Applies to the Emergency Containment Filter System, the Post Accident Containment Vent System, and the Control Room Ventilation System.

Objectives: To verify that these systems and their components will be able to perform their design functions.

In the event that painting, fire, or chemical release occurs such that the filters are exposed to the effluents of these events, the system will be tested to verify its performance or design features.

Specification: 1. EMERGENCY CONTAINMENT FILTER SYSTEM

1. Operating Tests

System tests shall be performed once per operating cycle or once per 18 months, whichever comes first. The tests shall consist of pressure drop and flow measurements across all filter banks in the plenum. Less than 6" of water pressure drop at design flow (37,500 cfm ± 10%) across the combined HEPA filter and charcoal adsorbers shall constitute acceptable performance. Visual inspection shall include search for any foreign material and gasket deterioration of the HEPA filters and charcoal adsorbers.

Once per operating cycle, each unit of the Emergency Containment Filtering System shall be tested to demonstrate automatic initiation upon receipt of a Safety Injection signal. Each unit of the Emergency Containment Filtering System shall be operated monthly for at least 15 minutes on a staggered basis to demonstrate operability.

2. Performance Tests

a. A visual inspection shall be made before each in-place air flow distribution test, DOP test or halogenated leak test. At least once per 18 months or after every 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests at design flow (37,500 cfm ± 10%) and carbon analysis for each Emergency Containment Filter plenum shall be performed. In addition, carbon analysis and in-place DOP, and halogenated hydrocarbon tests at design flow (37,500 cfm ± 10%) shall be performed after (1) any structural maintenance on system housings, which might have affected filter bank efficiency, (2) after complete or partial replacement of a filter bank, or (3) after operational exposure of the filters to effluents from painting, fire, or chemical release. Removal of ≥ 99% DOP and ≥ 99% halogenated hydrocarbon shall constitute acceptable performance. Fans shall operate at design flow (37,500 cfm ± 10%). The charcoal surveillance specimen from one of the emergency containment filters shall show > 99.9% removal efficiency for elemental iodine. Samples will be taken in accordance with position C.6.b of Regulatory Guide 1.52. Carbon analysis will be performed in accordance with ANSI N510-1975. Analysis shall verify the above removal efficency for elemental iodine within 45 days after removal of the sample. Failing this, the charcoal shall be replaced with charcoal which meets or exceeds the criteria of position C.6.a of Regulatory Guide 1.52 (Revision 2).

b. An air distribution test shall be performed at design flow (37,500 cfm ± 10%) at least once after maintenance affecting flow distribution.

c. Flow rate should be verified following maintenance to HEPA or charcoal housing, or following painting or chemical release in its ventilation zone while the system is operating, or once each 18 months.

2. POST ACCIDENT CONTAINMENT VENT SYSTEM

1. Operating Tests

Operating tests shall be performed during refueling but not longer than 18 months. The tests shall consist of visual inspection of the system, operation of all valves, and pressure drop and air flow measurements. Visual inspection shall include a search for any foreign materials and gasket deterioration in the HEPA filters and charcoal adsorbers. Less than 6" of water pressure drop at 55 cfm flow shall constitute acceptable performance.

2. Performance Tests

a. A visual inspection of the system shall be made before each DOP test, and halogenated hydrocarbon leak test. At least once per 18 months or after 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests at design flow (55 cfm $\pm$ 10%) and carbon analysis, or carbon replacement, for the Post Accident Containment Vent filters shall be performed. In addition carbon analysis (or carbon replacement), DOP, and halogenated hydrocarbon tests at design flow (55 cfm $\pm$ 10%) shall be performed after (1) any structural maintenance on system housings which might have affected filter bank efficiency, (2) after complete or partial replacement of a filter bank or (3) after exposure of the filters to effluents from painting, fire or chemical release. Removal of $\geq$ 99% DOP and $\geq$ 99% halogenated hydrocarbon shall constitute acceptable performance.

b. Laboratory carbon sample analysis shall show $\geq$ 90% methyl radio-iodine removal or the charcoal shall be replaced with charcoal that meets or exceeds the criteria of position C.6.a of Regulatory Guide 1.52 (Revision 2). The sample shall be taken in accordance with position C.6.b. of Regulatory Guide 1.52. Carbon analysis shall be performed in accordance with ANSI N510-1975. Analysis shall verify the above removal efficiency for radioiodine within 45 days after removal of the sample.

c. The hydrogen concentration measurement instrument shall be calibrated with proper consideration for humidity.

3. CONTROL ROOM VENTILATION (EMERGENCY INTERNAL CLEANUP) SYSTEM

1. A visual inspection shall be made before each in-place DOP test, hydrogenated hydrocarbon leak test, and airflow distribution test. The Control Room Ventilation System shall be operated monthly for at least 15 minutes to demonstrate operability. Auto initiation of the systems operations shall be checked during refueling, but not longer than 18 months. Pressure drop measurements across the filter bank shall be made annually. Less than 6" of water pressure drop at designed flow (1,000 cfm ± 10%) across the combined HEPA filter and charcoal adsorbers shall constitute acceptable performance. A visual inspection shall include a search for any foreign materials and gasket deterioration in the HEPA filters and charcoal adsorbers.

2. Performance Tests

   a. A visual inspection shall be made before each in-place DOP test, halogenated hydrocarbon leak test, and airflow distribution test. At least once per 18 months or after every 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests at design flow (1,000 cfm ± 10%) and carbon analysis shall be performed. In addition, carbon analysis (or carbon replacement) in-place DOP, and halogenated hydrocarbon tests at design flow (1,000 cfm ± 10%) shall be performed after (1) any structural maintenance on system housings, which might have affected filter bank efficiency, (2) after complete or partial replacement of a filter bank, or (3) after operational exposure of the filters to effluents from painting, fire, or chemical release. Removal of ≥ 99% DOP and ≥ 99% halogenated hydrocarbon shall constitute acceptable performance.

   b. A charcoal surveillance specimen from one of the charcoal adsorbers shall be removed and analyzed for methyl radio-iodine removal capability. The results of the laboratory carbon sample analysis shall show ≥ 90% methyl radio-iodine removal efficiency. Samples shall be taken in accordance with position C.6.b of Regulatory Guide 1.52. Carbon analysis shall be performed in accordance with ANSI N510-19/5. Analysis shall verify the above removal efficiency for methyl radio-iodine within 45 days after removal of the sample. Failing this, the charcoal shall be replaced with charcoal which meets or exceeds the criteria of position C.6.a of Regulatory Guide 1.52 (Revision 2)

   c. System flow rate should be verified once each 18 months, following maintenance to HEPA or charcoal housings, or fire, or chemcial release in its ventilation zone while the system is operating.

B4.7 BASES FOR EMERGENCY CONTAINMENT FILTERING SYSTEM, POST ACCIDENT CONTAINMENT VENT SYSTEM, AND CONTROL ROOM VENTILATION SYSTEM.

System components are not subject to rapid deterioration, having lifetimes of many years, even under continuous flow conditions. Visual inspection an operating tests provide assurance of system reliability and will insure early detection of conditions which could cause the system to fail or operate improperly. The performance tests prove conclusively that filters have been properly installed, that no deterioration or damage has occurred, and that all components and subsystems operate properly. The tests are performed in accordance with the methodology and intent of ANSI N510 (1975) and provide assurance that filter performance has not deteriorated below required specification values due to aging, contamination, or other effects.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 83 TO FACILITY OPERATING LICENSE NO. DPR-31

AND AMENDMENT NO. 77 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT PLANT UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

Introduction

By letter dated January 18, 1982, Florida Power and Light Company (FP&L or the licensee) submitted a request to modify the Technical Specifications, Appendix A to Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Plant Unit Nos. 3 and 4. The request would update the Technical Specifications for the containment and control room filter systems which are part of the engineered safety features (ESF) of the plant.

The amendment request was submitted in response to our letter dated November 20, 1981, which summed up the staff review of the installed filter systems of the Turkey Point Plant, Units 3 and 4.

During our review, we found it necessary to make a change in the amendment request. We have discussed the change with the licensee. He has agreed with the change and the change has been incorporated into the Technical Specifications.

Discussion

Our letter of November 20, 1981, to FP&L was a summary of the review effort which was begun because the staff found a need for Turkey Point Plant Unit Nos. 3 and 4 Technical Specifications to include additional items within their limiting conditions for operation (LCO) and surveillance requirements (SR) in order to assure confidence that safety related air filter systems would function reliably, when required, at a degree of efficiency equal to or greater than that assumed in previously performed accident analyses.

FP&L's proposed changes to the Technical Specifications include:

(1) revision to LCO 3.4.3, and SR 4.7.1 and 4.7.2 which address the emergency containment filtering system and the post-accident containment vent system; and

(2) the addition of LCOs 3.4.6 and 3.4.7, and SR 4.7.3 which address the post accident containment vent system and the control room ventilation system.

FP&L's proposal includes the addition of a technical specification on a system not presently covered in the technical specification (the control room ventilation system) and the expansion of present technical specification for the post accident containment vent system and the emergency containment filtering system such that the frequency of some tests are increased and the number of tests performed to establish the system's operability are increased.

The changes were proposed by FP&L so that the specified filter test program would conform to the objectives of the model Technical Specifications.

Evaluation

Our evaluation was based upon Positions C.5 (in-place testing criteria) and C.6 (laboratory testing criteria for activated charcoal) of Regulatory Guide 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Atmospheric Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants", and on the Standard Technical Specifications for ESF air filtration systems for Westinghouse nuclear reactors (NUREG-0452). The technical specifications proposed by FP&L would provide a LCO and SR for the control room ventilation system, a LCO for the post-accident containment vent system and would modify the present LCO 3.4.3 (Emergency Containment Ventilation System) and SRs 4.7.1 and 4.7.2 (Emergency Containment Filtering System and Post-Accident Containment Vent System), respectively. These additions and revisions to the present technical specifications have expanded the scope of the LCO's and SRs such that they now specify required operator action if the particular ESF filter system is found inoperable, and increase the frequency and the number of tests to be performed to demonstrate that the system is operable.

The following sections discuss each ESF filter system for which an LCO and a SR was added or revised.

Emergency Containment Filtering System

FP&L proposed that LCO (3.4.3) be modified such that one of the three systems be allowed to be inoperable for a period of 7 days, rather than 24 hours as in the present LCO. FP&L also proposed that any valve in the system be allowed to be inoperable provided repairs were completed within 7 days rather than 24 hours. FP&L also proposed that the if one system were inoperable after 7 days then Specification 3.0.1 applies. Specification 3.0.1 states that the reactor will be placed in the hot shutdown condition within 7 days if the system is not made operable after the period of time allotted and will be in cold shutdown within the next 30 hours if the unit is not operable after the 7 days.

Only two of the three emergency containment filtering systems are required to be operable during a Loss of Coolant Accident (LOCA) in order to mitigate the consequences such that the offsite doses are within the limits of 10 CFR Part 100. Therefore, the allowance of one system to be inoperable for a period of 7 days would not negate our accident evaluation presented in the

Turkey Point SER (March 15, 1972), which indicates that only two of three were assumed to operate during the course of a LOCA and that the doses are within the guidelines of 10 CFR Part 100. Therefore, we find these proposed changes to LCO 3.4.3 acceptable.

FP&L has proposed modifications to the operating tests and the performance tests presently in SR 4.7.1. Under Operating Tests FP&L has proposed that visual inspection of the system and pressure drop (Δp) system tests are to be performed on an operating cycle basis or once per 18 months, whichever comes first rather than on the present quarterly basis. FP&L has also added to the Operating Tests specific limits with respect to measuring the pressure drop across the filter system based upon the design flow rate of the system and that the system be demonstrated operable on a monthly basis. The licensee has also proposed that, on an operating cycle basis, each unit of the emergency containment filtering system demonstrates automatic initiation upon receipt of a Safety Injection signal. We find these changes consistent with that required for new licensees and acceptable.

Under performance tests the proposed technical specifications have been modified to increase the frequency in which in-place DOP and halogenated hydrocarbon tests are conducted. The requirement for a visual inspection prior to these in-place tests and prior to an air distribution test has been added. The latter test has also been added. The acceptance criteria for in place DOP and halogenated hydrocarbon testing has been set at $\geq$ 99% in conformance with the model technical specifications.

The frequency of obtaining samples of the charcoal adsorber and its associated analysis have been modified to reflect the model technical specifications. The proposed technical specification provide the procedures to be used for both the sampling and the analysis. Laboratory analysis is for elemental radioiodine rather methyl radioiodine since the staff gave no credit for methyl radioiodine removal for this system in the LOCA analysis presented in the operating license SER.

The licensee has submitted an analysis of the control room habitability system in accordance with TMI item III.D.3.4 of NUREG-0737. In this analysis the licensee took credit for the emergency containment filtering system removing methyl radioiodine in order to meet GDC 19 of Appendix A of 10 CFR Part 50. The staff is presently reviewing this analysis. Upon completion of this review if it is determined that credit for methyl radioiodine is required in order to meet GDC 19 then the laboratory analysis will be based upon methyl radioiodine removal rather than elemental radioiodine. However, for the present, testing for elemental radioiodine is adequate.

We find the above changes consistent with either the present requirements for new licensees or model technical specifications. In addition, we find that the changes will ensure increased confidence that the system will be operable when called upon, and that the system will perform at the level assumed in the SER.

Post-Accident Containment Vent System

FP&L has proposed the addition of a new LCO 3.4.6 to its present technical specifications. The proposed LCO allows this ESF filter system to be inoperable for a period of 7 days. If the system is not operable at the end of this 7 day period then Specification 3.0.1 will apply as it did for the emergency containment filtering system. Any valve in the system may be inoperable provided repairs are completed within 7 days. Prior to any maintenance on an inoperable valve, all valves that provide a duplicate function will be tested for operability.

The addition of the above LCO provides guidance to the operator not presently in the technical specifications in the event the system is inoperable.

FP&L has proposed to modify SR 4.7.2's operating tests to include flow rate and a pressure drop measurement at the system's flow rate. The performance tests have been modified. New performance test requirements include:

(1) visual inspection of the system before each DOP test, halogenated hydrocarbon leak test, and, upon completion of the leak tests, following reinstallation of the system into its operational configuration in the auxiliary building;

(2) detailing under what conditions DOP, halogenated hydrocarbons and laboratory analysis of charcoal adsorber should be performed; and

(3) requirements for a laboratory analysis of charcoal adsorber exhibiting at least 90% removal efficiency for methyl radioiodine with the sample obtained in accordance with position C.6.b of Regulatory Guide 1.52, and analyzed in accordance with ANSI N510-1975 45 days after the sample is obtained.

The post-accident containment vent system is a passive system. It would operate only in the event of a LOCA and then only after it became necessary to purge the containment due to the buildup of hydrogen in the containment. The system is a low flow system (55 cfm) and would operate based upon the difference in pressure between the containment and the atmosphere. Therefore, at Turkey Point, it is not possible to test the system in-place. It must be removed in order that flow may be generated through the system and the system tested.

The staff had requested the licensee to include, as a part of the performance tests for the post-accident containment vent system, a visual inspection of the system after it had been tested and placed in its operational mode in the auxiliary building. The licensee had proposed such a requirement. However, upon further review, the staff questioned the ability of plant personnel to perform such an inspection. Further discussions with the licensee indicated that the only way to visually inspect the system once it was in its operational mode was to physically dismantle it again as is done for the DOP and freon tests. Since this would defeat the purpose of the visual inspection, the requirement to perform a visual inspection on the post-accident containment vent system has been eliminated. This change was discussed with the licensee who concurred with this change.

FP&L has proposed to modify the DOP removal efficiency from 99.5% to 99%. We find this proposed change acceptable, since it will not negate the conclusions reached with respect to the accident analysis.

We have reviewed the proposed LCO and the proposed modifications to SR 4.7.2. We find that the modifications meet the intent of position C.5 and C.6 of Regulatory Guide 1.52 and that of the Standard Technical Specifications for ESF filter systems for Westinghouse reactors. We find the above changes consistent with the intent of present requirements for new licensees, and that the changes will ensure increased confidence that the system will be operable when called upon and that the system will perform at the level such that the requirements of 10 CFR Part 100 are met.

Control Room Ventilation System

FP&L has proposed that a new LCO 3.4.7 and a new SR 4.7.3 be added to address the emergency internal cleanup system of this ESF filter system. FP&L has proposed a LCO which allows the control room system to be inoperable for a period of 3.5 days and any valve in the system to be inoperable for the same period of time. If the system remains inoperable after 3.5 days, Specification 3.0.1 applies. Prior to any maintenance work on an inoperable valve, any duplicate function valve will be required to be demonstrated as operable.

The operating tests proposed for SR 4.7.3 include:

(1) monthly operation of the system to demonstrate operability;

(2) verification of automatic initiation of the system on an 18 month basis;

(3) visual inspection; and

(4) measurement of pressure drop across the system at design flow.

The performance tests proposed include:

(1) visual inspection prior to each in-place DOP test, halogenated hydrocarbon leak test and airflow distribution test;

(2) requirements for when in-place DOP tests, halogenated hydrocarbon tests, and laboratory carbon analysis shall be performed;

(3) removal of 99% or greater DOP and 99% or greater halogenated hydrocarbon for in-place DOP test and halogenated hydrocarbon test, respectively;

(4) requirements for when system flow rate verification is necessary; and

(5) laboratory analysis of charcoal adsorbers showing 90% removal efficiency for methyl radioiodine tested in accordance with ANSI N510-1975 with analysis verified 45 days after the sample is obtained in accordance with position C.6.b of Regualtory Guide 1.52.

We have reviewed the proposed LCO and SR for this ESF filter system. We find that the LCO and SR provide a recognition of the importance of this system to the protection of the general health and safety of the public and to plant personnel that is not presently in the existing technical specifications. We find that the proposed specifications meet the intent of position C.5 and C.6 of Regulatory Guide 1.52 and the Standard Technical Specification for ESF filter systems for Westinghouse reactors. We find the proposed addition consistent

with the intent of present requirements for new operating licensees and that the addition of the proposed specifications will ensure increased confidence that the system will perform when called upon.

It should be noted that a review of control room habitability is required in response to TMI item III.D.3.4. FP&L has submitted this study to the staff for review. Upon the completion of the review by the staff, some changes to the proposed technical specification may or may not be required. If such changes are required, they will be required of FP&L at that time.

We have concluded the proposed changes to Specifications 3.4.3, 4.7.1, and 4.7.2 of the Turkey Point, Unit Nos. 3 and 4's Technical Specifications and the addition of Specifications 3.4.6, 3.4.7 and 4.7.3 are acceptable.

Environmental Consideration

We have determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of these amendments.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of accidents previously considered and do not involve a significant decrease in a safety margin, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: April 9, 1982

Principal contributor: J. Hayes

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NOS. 50-250 AND 50-251

FLORIDA POWER AND LIGHT COMPANY

NOTICE OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSES

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 83 to Facility Operating License No. DPR-31, and Amendment No. 77 to Facility Operating License No. DPR-41 issued to Florida Power and Light Company (the licensee), which revised Technical Specifications for operation of Turkey Point Plant, Unit Nos. 3 and 4 (the facilities) located in Dade County, Florida. The amendments are effective as of the date of issuance.

The amendments update the Technical Specifications for the containment and control room filter systems which are part of the engineered safety features of the plant.

The application for the amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments. Prior public notice of these amendments was not required since the amendments do not involve a significant hazards consideration.

The Commission has determined that the issuance of these amendments will not result in any significant environmental impact and that pursuant to

10 CFR §51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of these amendments.

For further details with respect to this action, see (1) the application for amendments dated January 18, 1982, (2) Amendment Nos. 83 and 77 to License Nos. DPR-31 and DPR-41, and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, NW., Washington, D. C. and at the Environmental and Urban Affairs Library, Florida International University, Miami, Florida 33199. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland, this 9th day of April, 1982.

FOR THE NUCLEAR REGULATORY COMMISSION

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