

March 20, 1987

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Amat 116 to DPR-41

Mr. C. O. Woody, Group Vice President
Nuclear Energy Department
Florida Power and Light Company
Post Office Box 14000
Juno Beach, Florida 33408

Dear Mr. Woody:

On March 6, 1987, the Commission issued Amendment No. 123 to Facility Operating License No. DPR-31 and Amendment No. 116 to Facility Operating License No. DPR-41 for the Turkey Point Plant, Unit Nos. 3 and 4, respectively. The amendment revised the immediate notification requirements and the Licensee Event Reporting System, as well as revising the Off-Site Organization for Facility Management and Technical Support and the Plant Organization Chart to reflect the current structure and position titles. The amendments also corrected areas in the Technical Specifications which contained conflicting submittal directions to be in accordance with the Final Rule on "Communications, Procedure Amendments, 10 CFR Part 50."

Due to an administrative error, a paragraph on page 2 of the Safety Evaluation, which should have been deleted prior to issuance of the amendments, was inadvertently was left on the page. Enclosed is a corrected copy of the Safety Evaluation, with a bar line on page 2 to indicate the deletion of the paragraph. The deletion of this paragraph in no way changes the staff's evaluation and conclusion which supported the changes to the Technical Specifications for Turkey Point, Units 3 and 4.

Please accept our apologies for this error.

Sincerely,

Daniel G. McDonald, Project Manager
PWR Project Directorate #2
Division of PWR Licensing-A
Office of Nuclear Reactor Regulations

Enclosure:
As stated

cc w/enclosure:
See next page

LA:PAD2
DMiller
3/19/87

DMcDonald
3/19/87

PD:PAD2
Rubenstein
for 3/19/87

Mr. C. O. Woody
Florida Power and Light Company

Turkey Point Plant

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 123 TO FACILITY OPERATING LICENSE NO. DPR-31
AND AMENDMENT NO. 116 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

I BACKGROUND

On December 19, 1983, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 83-43. This letter notified licensees of changes in reporting requirements of 10 CFR Part 50, Sections 50.72 and 50.73. These changes are designed to provide the Commission with more useful reports regarding the safety of operating nuclear power plants. These changes will require early reporting only on those matters of value to the exercise of the Commission's responsibilities.

II DISCUSSION

By letter dated August 20, 1985 as supplemented on May 13, 1986, Florida Power and Light Company (the licensee) provided their response to GL 83-43. The licensee's submittal also requested that the Technical Specifications be modified to reflect the current off-site Organization, reporting of reactor coolant specific activity as per the guidance provided in GL 85-19 "Reporting Requirements on Primary Coolant Iodine Spikes," and to correct appropriate references consistent with the amendment request.

The initial request also had changes relating to fire protection requirements as defined in 10 CFR 50, Appendix R. We indicated in our renote of No Significant Hazards Consideration, (50 FR 43679) published in the Federal Register on December 3, 1986 that the licensee was in the process of proposing an amendment to the Technical Specifications which would delete the existing Appendix R Technical Specifications, incorporate the Appendix R requirements in the Final Safety Analysis Report (FSAR) and maintain their approved fire protection program as described in the FSAR. This would be accomplished in accordance with the guidance provided in GL 86-10. As stated in the notice the staff has not acted on changes relating to fire protection requirements. However, as noted in the evaluation portion of this Safety Evaluation, we have corrected a typographical error relating to reporting requirements in previously approved Amendment Nos. 45 and 37.

Subsequent to the licensee's submittal, the Final Rule "Communications Procedures Amendments, 10 CFR Part 50" became effective. This rule supersedes all existing requirements and guidance with respect to the number of copies submitted to the NRC by the licensee and mailing procedures. The Commission's guidance documents dealing with communications procedures will be revised to conform with the rule. Licensees whose Technical Specifications contain conflicting submittal directions are authorized by this rule to delete the conflicting directions by pen-and-ink changes to their Technical Specifications. The Commission does not expect formal applications for amendment of license to result from this rulemaking. However, in this case the licensee's proposed amendment, modifying certain technical specifications to conform to 10 CFR 50.72 and 50.73, contained submittal directions conflicting with the new communications rule. Rather than issue the technical specifications with incorrect submittal directions, the submittal directions have been revised to conform to the new Communications rule. These changes do not affect the substance of the amendments as noticed.

If my changes accurately reflect what you intended to do, please make appropriate changes. With these changes, the package is okay and there is no need to return to OGC.

III EVALUATION

The evaluation of the proposed changes are grouped into the following areas:

- A. GL 83-43 changes
- B. Off-site Organization changes
- C. 10 CFR Part 50.4 "Written Communications" changes per the Final Rule
- D. Table of Contents, Bases and Format Changes

A. GL 83-43 Changes

Page 1-3. The definition of Reportable Event was added to be consistent with 10 CFR 50.73.

Page 3.1-5. The requirement to submit a reportable occurrence report for primary coolant specific activity is deleted. This is in accordance with GL 85-19 which requires that primary coolant specific activity need only be reported annually. Should the high specific activity last longer than the time allowed in Technical Specification (TS) 3.1.4.1, a shutdown would be required and a report per 10 CFR 50.72 would be submitted with full details of the event. The records of high activity for shorter periods would be available on site for review. The information required for TS 3.1.4.2 will now be included in the Radioactive Effluent Release Report.

Page 3.2-7. The requirement to submit an abnormal occurrence report to the NRC for power tilt is revised to require a Special Report. This is consistent with GL 83-43.

Pages 3.14-1, 3.14-2 and 3.14-3. These pages have been corrected to reference Section 6.9.3.c for reporting requirements. The previous reference was

Section 6.9.3.c for reporting requirements. The previous reference was Section 6.9.2.b which identified occurrences which required thirty day written notice. This was inconsistent with Section 6.9.3.c which indicated that fire protection systems be special reports. This is no change from the existing requirement and corrects a previous typographical error which existed in the Technical Specifications when Amendment Nos. 45 and 37 were approved.

Page 4.2-6 and Table 4.2-3. The prompt reportable occurrence report required for steam generator inspections which fall into Category C-3 is changed to a Special Report. This is consistent with our current requirements.

Page 4.11-1. The 24-hour report with written followup for reactivity anomalies is changed to a Special Report in accordance with GL 83-43.

Page 6-8. Specification 6.5.1.6 is revised in accordance with GL 83-43 to add the requirement for the plant Nuclear Safety Committee to review Reportable Events.

Page 6-11. Specification 6.5.2.7.g is revised to require CNRB review of Reportable Events in accordance with GL 83-43.

Page 6-14. Specification 6.6 is revised in accordance with GL 83-43 to address Reportable Event actions.

Page 6-16. Specification 6.9.2, Reportable Occurrences, is deleted in accordance with GL 83-43. The redundant reference to Section 20.407 of 10 CFR Part 20 is also deleted.

Pages 6-18 and 6-19. Special Reports are added to Specification 6.9.3 to be consistent with the proposed specifications in accordance with GL 83-43.

Page 6-21. Specification 6.9.4.a is changed to be consistent with the changes on Page 3.1-5 discussed above and is consistent with the guidance provided in GL 85-19.

Pages 6-23 and 6-24. The record retention requirements for Reportable Events is revised in accordance with GL 83-43.

The proposed changes discussed above are in response to GL 83-43 and are consistent with the guidance provided in the GL. The changes are also consistent with the reporting requirements of 10 CFR 50.72 and 50.73 and are therefore acceptable.

B. Off-site Organization Changes

Pages 6-6, 6-7, 6-8, 6-9, 6-10 and Figures 6.2-1 and 6.2-2. The additions include a Group Vice President for the engineering, project management, construction, power supply, system planning and fuel resources areas, and a Site Engineering Manager reporting to the Vice President Turkey Point Nuclear. The Group Vice President replaced the Power Plant Engineering Principal Engineer as a member of the Company Nuclear Review Board (CNRB). The composition of the CNRB (6.5.2.2, Page 6-9) is changed to reflect this. Specification 6.5.2.3 is revised to reflect the NRC staff's current position on the

participation of alternate members on the CNRB. Other pages in Section 6 of the Technical Specifications have been corrected to reflect corrected titles. Figures 6.2-1 and 6.2-2 reflect the current licensee's organization.

We conclude that the organization structure changes as discussed above do not diminish FPL's ability to safely operate the Turkey Point Units 3 & 4 and the proposed modifications to Figures 6.2-1 and 6.2-2 to reflect these changes are acceptable. The corporate position titles of the designated CNRB members are such that the incumbents are expected to be qualified to perform the independent review functions and these changes are therefore acceptable.

C. 10 CFR 50.4, Written Communications Changes per the Final Rule.

Pages 6-15, 6-16 and 6-17. These pages have been modified in respect to the number of copies and the mailing procedures as specified in the Final Rule (10 CFR 50.4). These changes were provided with this amendment to delete conflicting submittal directions. The submittal directions are consistent with the Final Rule and are therefore acceptable.

D. Table of Contents, List of Figures, Bases and Format-only changes.

The Table of Contents and List of Figures (Pages i, ii, iii and iv) are revised to be consistent with the changes requested and the existing Turkey Point Technical Specifications. The entire Section 6, "Administrative Controls," has been reformatted and consists of less pages. Pages 6-1, 6-5, 6-6, 6-12, 6-13, 6-20, 6-22, 6-25, 6-26, 6-27 and Table 6.2-1 have no changes to the content of the Technical Specifications. These pages have been retyped to be consistent with the format of Section 6. The Bases Section, Page B3.14-1 has been updated to indicate that immediate corrective actions must be taken if a fire suppression water system becomes inoperable. This change is consistent with the staff's fire protection evaluations. Pages B4.2-1 and B3.14-1 have been modified to reference the correct reporting requirements of Section 6 of the Technical Specification.

The staff has determined that these changes support the proposed revisions to the Technical Specifications previously discussed and are therefore acceptable.

Based on the above evaluation, we conclude that the proposed changes are in accordance with the guidance provided in GL 83-43 and GL 85-19; do not diminish FPL's ability to safely operate the Turkey Point Facility; deletes conflicting submittal directions; and are therefore acceptable.

IV. ENVIRONMENTAL CONSIDERATION

These amendments involve changes in the installation or use of the facilities components located within the restricted areas as defined in 10 CFR 20. The staff has determined that these 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 these amendments involve no significant hazards

consideration and there has been no public comment on such finding. 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 these amendments.

V. CONCLUSION

We have 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, and (2) 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: March 6, 1987

Principal Contributors:

P. Moore
D. McDonald