



August 16, 2002
L-2002-174
10 CFR 50.90
10 CFR 50.91

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

RE: Turkey Point Unit 4
Docket No. 50-251
Proposed License Amendment
Inoperable Rod Position Indication

Florida Power & Light Company (FPL) submitted the Proposed License Amendment for an Inoperable Rod Position Indication via letter L-2002-152, dated July 29, 2002. Per telephone conference on August 15, 2002, the Staff requested FPL to revise the proposed Technical Specification changes by specifying the proposed alternate monitoring method to determine rod position to be used in place of the analog Rod Position Indication System for rod C-9 in Shutdown Bank A. Attachments 1 and 2 provide the revised mark-up and a clean copy of the proposed revisions to the Technical Specifications (TS).

This letter and its attachments supplement our letter L-2002-152, providing clarification by making minor revisions to the proposed TS changes. This letter does not propose any change in scope, or intent from those submitted in L-2002-152. FPL has determined that the proposed revisions to the TS provided herein do not change the conclusions reached in the original no significant hazards consideration determination, or the original environmental impact consideration determination, provided in L-2002-152.

Please contact Walter Parker, Licensing Manager, at (305) 246-6632, if there are any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. McElwain", is written over the typed name.

J. P. McElwain
Vice President
Turkey Point Plant

OIH

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. W. A. Passetti, Florida Department of Health

ADD1

STATE OF FLORIDA)
) ss.
COUNTY OF MIAMI-DADE)

J. P. McElwain being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.


J. P. McElwain

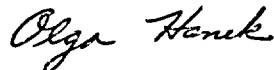
STATE OF FLORIDA

COUNTY OF Miami-Dade

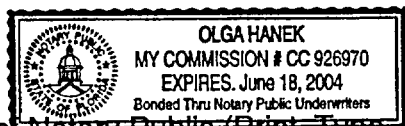
Sworn to and subscribed before me

this 16 day of August, 2002

by, J. P. McElwain who is personally known to me.



Signature of Notary Public-State of Florida



Name of Notary Public (Print, Type, or Stamp)

Attachment 1 to L-2002-174

TURKEY POINT UNIT 4 MARK-UP TECHNICAL SPECIFICATION PAGES

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REACTIVITY CONTROL SYSTEMS

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

GROUP HEIGHT

LIMITING CONDITION FOR OPERATION

3.1.3.1 All full length (shutdown and control) rods shall be OPERABLE and positioned within the Allowed Rod Misalignment between the Analog Rod Position Indication ** and the group step counter demand position within one hour after rod motion. The Allowed Rod Misalignment shall be defined as:

- a. for THERMAL POWER less than or equal to 90% of RATED THERMAL POWER, the Allowed Rod Misalignment is ± 18 steps, and
- b. for THERMAL POWER greater than 90% of RATED THERMAL POWER, the Allowed Rod Misalignment is ± 12 steps.

APPLICABILITY: MODES 1* and 2*

ACTION:

- a. With one or more full length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in HOT STANDBY within 6 hours.
- b. With more than one full length rod inoperable or misaligned from the group step counter demand position by more than ± 12 steps and THERMAL POWER greater than 90% of RATED THERMAL POWER, within 1 hour either:
 1. Restore all indicated rod positions to within the Allowed Rod Misalignment, or
 2. Reduce THERMAL POWER to less than 90% of RATED THERMAL POWER and confirm that all indicated rod positions are within the Allowed Rod Misalignment, or
 3. Be in HOT STANDBY within the following 6 hours.
- c. With more than one full length rod inoperable or misaligned from the group step counter demand position by more than ± 18 steps and THERMAL POWER less than or equal to 90% of RATED THERMAL POWER, within 1 hour either:
 1. Restore all indicated rod positions to within the Allowed Rod Misalignment, or
 2. Be in HOT STANDBY within the following 6 hours.

*See Special Test Exceptions 3.10.2 and 3.10.3.

**During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.

REACTIVITY CONTROL SYSTEMS
LIMITING CONDITION FOR OPERATION (Continued)

- d. With one full length rod inoperable due to causes other than addressed by ACTION a, above, or misaligned from its group step counter demand position by more than the Allowed Rod Misalignment of Specification 3.1.3.1, POWER OPERATION may continue provided that within one hour either:
1. The rod is restored to OPERABLE status within the Allowed Rod Misalignment of Specification 3.1.3.1, or
 2. The remainder of the rods in the bank with the inoperable rod are aligned to within the Allowed Rod Misalignment of Specification 3.1.3.1 of the inoperable rod while maintaining the rod sequence and insertion limits of Specification 3.1.3.6; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation, or
 3. The rod is declared inoperable and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied. POWER OPERATION may then continue provided that:
 - a) The THERMAL POWER level is reduced to less than or equal to 75% of RATED THERMAL POWER within one hour and within the next 4 hours the power range neutron flux high trip setpoint is reduced to less than or equal to 85% of RATED THERMAL POWER. THERMAL POWER shall be maintained less than or equal to 75% of RATED THERMAL POWER until compliance with ACTIONS 3.1.3.1.d.3.c and 3.1.3.1.d.3.d below are demonstrated, and
 - b) The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours, and
 - c) A power distribution map is obtained from the movable incore detectors and $F_Q(Z)$ and $F_{\Delta H}^N$ are verified to be within their limits within 72 hours, and
 - d) A reevaluation of each accident analysis of Table 3.1-1 is performed within 5 days; this reevaluation shall confirm that the previously analyzed results of these accidents remain valid for the duration of operation under these conditions.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position \pm of each full length rod shall be determined to be within the Allowed Rod Misalignment of the group step counter demand position at least once per 12 hours (allowing for one hour thermal soak after rod motion) except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours. **

4.1.3.1.2 Each full length rod not fully inserted in the core shall be determined to be OPERABLE by movement of at least 10 steps in any one direction at least once per 92 days.

* During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.

** During Unit 4 Cycle 20, the position of rod C-9, Shutdown Bank A, may be monitored by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state and it will not provide an input into the Rod Position Deviation Monitor. The use of the alternate method for rod C-9 does not require the 4 hour comparison of demanded versus actual position per 4.1.3.1.1.

REACTIVITY CONTROL SYSTEMS

POSITION INDICATION SYSTEMS - OPERATING

LIMITING CONDITION FOR OPERATION (Continued)

3.1.3.2 The Analog Rod Position Indication System * and the Demand Position Indication System shall be OPERABLE and capable of determining the respective actual and demanded shutdown and control rod positions as follows:

- a. Analog rod position indicators *, within one hour after rod motion (allowance for thermal soak);

All Shutdown Banks: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal ranges of 0-30 steps and 200-All Rods Out as defined in the Core Operating Limits Report.

Control Bank A and B: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal ranges of 0-30 steps and 200-All Rods Out as defined in the Core Operating Limits Report.

Control Banks C and D: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal range of 0-All Rods Out as defined in the Core Operating Limits Report.
- b. Group demand counters; ± 2 steps.

APPLICABILITY: MODES 1 and 2.

ACTION:

- a. With a maximum of one analog rod position indicator * per bank inoperable either:
 1. Determine the position of the non-indicating rod(s) * indirectly by the movable incore detectors at least once per 8 hours and within one hour after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position, or
 2. Reduce THERMAL POWER to less than 75% of RATED THERMAL POWER within 8 hours.
- b. With a maximum of one demand position indicator per bank inoperable either:
 1. Verify that all analog rod position indicators for the affected bank are OPERABLE and that the most withdrawn rod and the least withdrawn rod of the bank are within the Allowed Rod Misalignment of Specification 3.1.3.1 at least once per 8 hours, or
 2. Reduce THERMAL POWER to less than 75% of RATED THERMAL POWER within 8 hours.

* During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS

4.1.3.2.1 Each analog rod position indicator * shall be determined to be OPERABLE by verifying that the Demand Position Indication System and the Analog Rod Position Indication System * agree within the Allowed Rod Misalignment of Specification 3.1.3.1 (allowing for one hour thermal soak after rod motion) at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor ** is inoperable, then compare the Demand Position Indication System and the Analog Rod Position Indication System at least once per 4 hours.

4.1.3.2.2 Each of the above required analog rod position indicator(s) * shall be determined to be OPERABLE by performance of a CHANNEL CHECK, CHANNEL CALIBRATION and ANALOG CHANNEL OPERATIONAL TEST performed in accordance with Table 4.1-1.

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- * During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.
 - ** During Unit 4 Cycle 20, the position of rod C-9, Shutdown Bank A, may be monitored by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state and it will not provide an input into the Rod Position Deviation Monitor. The use of the alternate method for rod C-9 does not require the 4 hour comparison of demanded versus actual position per 4.1.3.2.1.

REACTIVITY CONTROL SYSTEMS

SHUTDOWN ROD INSERTION LIMIT

LIMITING CONDITION FOR OPERATION

3.1.3.5 All shutdown rods shall be fully withdrawn.

APPLICABILITY: MODES 1* and 2* **

ACTION:

With a maximum of one shutdown rod not fully withdrawn, except for surveillance testing pursuant to Specification 4.1.3.1.2, within 1 hour either:

- a. Fully withdraw the rod, or
- b. Declare the rod to be inoperable and apply Specification 3.1.3.1.

SURVEILLANCE REQUIREMENTS

4.1.3.5 Each shutdown rod *** shall be determined to be fully withdrawn:

- a. Within 15 minutes prior to withdrawal of any rods in control banks A, B, C, or D during an approach to reactor criticality, and
- b. At least once per 12 hours thereafter.

*See Special Test Exceptions Specifications 3.10.2 and 3.10.3.

**With K_{eff} greater than or equal to 1.0

*** During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.

Attachment 2 to L-2002-174

TURKEY POINT UNIT 4 CLEAN TECHNICAL SPECIFICATION PAGES

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REACTIVITY CONTROL SYSTEMS

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

GROUP HEIGHT

LIMITING CONDITION FOR OPERATION

3.1.3.1 All full length (shutdown and control) rods shall be OPERABLE and positioned within the Allowed Rod Misalignment between the Analog Rod Position Indication ** and the group step counter demand position within one hour after rod motion. The Allowed Rod Misalignment shall be defined as:

- a. for THERMAL POWER less than or equal to 90% of RATED THERMAL POWER, the Allowed Rod Misalignment is ± 18 steps, and
- b. for THERMAL POWER greater than 90% of RATED THERMAL POWER, the Allowed Rod Misalignment is ± 12 steps.

APPLICABILITY: MODES 1* and 2*

ACTION:

- a. With one or more full length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in HOT STANDBY within 6 hours.
- b. With more than one full length rod inoperable or misaligned from the group step counter demand position by more than ± 12 steps and THERMAL POWER greater than 90% of RATED THERMAL POWER, within 1 hour either:
 1. Restore all indicated rod positions to within the Allowed Rod Misalignment, or
 2. Reduce THERMAL POWER to less than 90% of RATED THERMAL POWER and confirm that all indicated rod positions are within the Allowed Rod Misalignment, or
 3. Be in HOT STANDBY within the following 6 hours.
- c. With more than one full length rod inoperable or misaligned from the group step counter demand position by more than ± 18 steps and THERMAL POWER less than or equal to 90% of RATED THERMAL POWER, within 1 hour either:
 1. Restore all indicated rod positions to within the Allowed Rod Misalignment, or
 2. Be in HOT STANDBY within the following 6 hours.

*See Special Test Exceptions 3.10.2 and 3.10.3.

**During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed, until the repair of the indication system for this rod is completed.

REACTIVITY CONTROL SYSTEMS
LIMITING CONDITION FOR OPERATION (Continued)

- d. With one full length rod inoperable due to causes other than addressed by ACTION a, above, or misaligned from its group step counter demand position by more than the Allowed Rod Misalignment of Specification 3.1.3.1, POWER OPERATION may continue provided that within one hour either:
1. The rod is restored to OPERABLE status within the Allowed Rod Misalignment of Specification 3.1.3.1, or
 2. The remainder of the rods in the bank with the inoperable rod are aligned to within the Allowed Rod Misalignment of Specification 3.1.3.1 of the inoperable rod while maintaining the rod sequence and insertion limits of Specification 3.1.3.6; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation, or
 3. The rod is declared inoperable and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied. POWER OPERATION may then continue provided that:
 - a) The THERMAL POWER level is reduced to less than or equal to 75% of RATED THERMAL POWER within one hour and within the next 4 hours the power range neutron flux high trip setpoint is reduced to less than or equal to 85% of RATED THERMAL POWER. THERMAL POWER shall be maintained less than or equal to 75% of RATED THERMAL POWER until compliance with ACTIONS 3.1.3.1.d.3.c and 3.1.3.1.d.3.d below are demonstrated, and
 - b) The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours, and
 - c) A power distribution map is obtained from the movable incore detectors and $F_Q(Z)$ and $F_{\Delta H}^N$ are verified to be within their limits within 72 hours, and
 - d) A reevaluation of each accident analysis of Table 3.1-1 is performed within 5 days; this reevaluation shall confirm that the previously analyzed results of these accidents remain valid for the duration of operation under these conditions.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position * of each full length rod shall be determined to be within the Allowed Rod Misalignment of the group step counter demand position at least once per 12 hours (allowing for one hour thermal soak after rod motion) except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours. **

4.1.3.1.2 Each full length rod not fully inserted in the core shall be determined to be OPERABLE by movement of at least 10 steps in any one direction at least once per 92 days.

* During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.

** During Unit 4 Cycle 20, the position of rod C-9, Shutdown Bank A, may be monitored by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state and it will not provide an input into the Rod Position Deviation Monitor. The use of the alternate method for rod C-9 does not require the 4 hour comparison of demanded versus actual position per 4.1.3.1.1.

REACTIVITY CONTROL SYSTEMS

POSITION INDICATION SYSTEMS - OPERATING

LIMITING CONDITION FOR OPERATION (Continued)

3.1.3.2 The Analog Rod Position Indication System * and the Demand Position Indication System shall be OPERABLE and capable of determining the respective actual and demanded shutdown and control rod positions as follows:

- a. Analog rod position indicators *, within one hour after rod motion (allowance for thermal soak);

All Shutdown Banks: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal ranges of 0-30 steps and 200-All Rods Out as defined in the Core Operating Limits Report.

Control Bank A and B: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal ranges of 0-30 steps and 200-All Rods Out as defined in the Core Operating Limits Report.

Control Banks C and D: within the Allowed Rod Misalignment of Specification 3.1.3.1 of the group demand counters for withdrawal range of 0-All Rods Out as defined in the Core Operating Limits Report.

- b. Group demand counters; ± 2 steps.

APPLICABILITY: MODES 1 and 2.

ACTION:

- a. With a maximum of one analog rod position indicator * per bank inoperable either:
1. Determine the position of the non-indicating rod(s) * indirectly by the movable incore detectors at least once per 8 hours and within one hour after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position, or
 2. Reduce THERMAL POWER to less than 75% of RATED THERMAL POWER within 8 hours.
- b. With a maximum of one demand position indicator per bank inoperable either:
1. Verify that all analog rod position indicators for the affected bank are OPERABLE and that the most withdrawn rod and the least withdrawn rod of the bank are within the Allowed Rod Misalignment of Specification 3.1.3.1 at least once per 8 hours, or
 2. Reduce THERMAL POWER to less than 75% of RATED THERMAL POWER within 8 hours.

* During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS

4.1.3.2.1 Each analog rod position indicator * shall be determined to be OPERABLE by verifying that the Demand Position Indication System and the Analog Rod Position Indication System * agree within the Allowed Rod Misalignment of Specification 3.1.3.1 (allowing for one hour thermal soak after rod motion) at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor ** is inoperable, then compare the Demand Position Indication System and the Analog Rod Position Indication System at least once per 4 hours.

4.1.3.2.2 Each of the above required analog rod position indicator(s) * shall be determined to be OPERABLE by performance of a CHANNEL CHECK, CHANNEL CALIBRATION and ANALOG CHANNEL OPERATIONAL TEST performed in accordance with Table 4.1-1.

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- * During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.
 - ** During Unit 4 Cycle 20, the position of rod C-9, Shutdown Bank A, may be monitored by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state and it will not provide an input into the Rod Position Deviation Monitor. The use of the alternate method for rod C-9 does not require the 4 hour comparison of demanded versus actual position per 4.1.3.2.1.

REACTIVITY CONTROL SYSTEMS

SHUTDOWN ROD INSERTION LIMIT

LIMITING CONDITION FOR OPERATION

3.1.3.5 All shutdown rods shall be fully withdrawn.

APPLICABILITY: MODES 1* and 2* **

ACTION:

With a maximum of one shutdown rod not fully withdrawn, except for surveillance testing pursuant to Specification 4.1.3.1.2, within 1 hour either:

- a. Fully withdraw the rod, or
- b. Declare the rod to be inoperable and apply Specification 3.1.3.1.

SURVEILLANCE REQUIREMENTS

4.1.3.5 Each shutdown rod *** shall be determined to be fully withdrawn:

- a. Within 15 minutes prior to withdrawal of any rods in control banks A, B, C, or D during an approach to reactor criticality, and
- b. At least once per 12 hours thereafter.

*See Special Test Exceptions Specifications 3.10.2 and 3.10.3.

**With K_{eff} greater than or equal to 1.0

*** During Unit 4 Cycle 20, the position of Rod C-9 Shutdown Bank A will be determined every 8 hours by verifying gripper coil parameters of the Control Rod Drive Mechanism to determine it has not changed state, until the repair of the indication system for this rod is completed.