September 10, 2002

Mr. J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: CORRECTIONS TO TURKEY POINT UNIT 4 EXIGENT TECHNICAL SPECIFICATION AMENDMENT CONCERNING CONTROL ROD POSITION INDICATION SYSTEM (TAC NO. MB5703)

Dear Mr. Stall:

On August 20, 2002, Amendment No. 216 to Facility Operating License No. DPR-41 for the Turkey Point Plant Unit 4 was issued. This amendment revised the Technical Specifications (TSs) in response to Florida Power and Light Company's application dated July 29, 2002, as supplemented by letters dated August 14 and August 16, 2002. Your Turkey Point Licensing staff noted minor editorial errors in the amendment and associated safety evaluation (SE). These editorial corrections are denoted in the attached pages by margin bars. Also to provide consistency and clarity with your submittals, corrections were made in the SE to more accurately reflect those compensatory actions you will be taking as a result of the amendment.

These changes do not affect the conclusion of the SE. We apologize for any inconvenience this may have caused. Enclosed please find the corrected pages.

Sincerely,

/RA/

Eva A. Brown, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-251

Enclosure: Corrected Pages

cc w/encls: See next page

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FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 216
License No. DPR-41

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:

   A. The application for amendment by Florida Power and Light Company (the licensee) dated July 29, 2002, as supplemented by letters dated August 14 and August 16, 2002, 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 set forth in 10 CFR Chapter I;

   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:

2.0 BACKGROUND

TS 3.1.3.2 currently requires the RPI System to be operable and capable of determining the respective actual and demanded shutdown and control rod positions. With a maximum of one RPI per bank inoperable, the TS ACTION statement requires that the licensee determine the position of the non-indication rod(s) indirectly by using the movable incore detectors once every 8 hours and within 1 hour for any movement of the non-indicating rod which exceeds 24 steps in one direction. The licensee also has the option to reduce power to 75 percent of rated thermal power.

The proposed change would permit the licensee to monitor the stationary gripper coil of the CRDM for control rod C-9 in lieu of the RPI system, thus partially restoring the ability to determine RPI for control rod C9. This alternate method would be used for control rod C-9 RPI in TS Sections 3.1.3.1, 3.1.3.2, and 3.1.3.5. The licensee would be required to verify every 8 hours that the gripper coil has not changed state. The absence of movement of the gripper coil would indicate that the control rod had not moved.

Additionally, the proposed change will add a footnote to TSs 3/4.1.3.1, 3/4.1.3.2 and 3/4.3.1.3.5, which states that during Cycle 20 the position of control rod C-9 will be determined indirectly by an alternate method, other than the Analog Rod Position Indication system, until the repair of the indication system for this rod is completed. Additionally, a footnote stating that the use of the alternate method for control rod C-9 does not require the 4-hour comparison of demand versus actual position will be added to SRs 4.1.3.1.1 and 4.1.3.2.1. This change would not affect the existing TS surveillance requirements to determine control rod C-9's position by flux map every 31 days, but would require the licensee to determine control rod C-9's position using the movable incore system at least once every 31 days. However, it would relieve the licensee from performing this determination every 8 hours as the existing TSs require.

3.0 EVALUATION

According to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix A, General Design Criteria 13, Instrumentation and Controls, instrumentation to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences, and accident conditions must be OPERABLE. TS 3.1.3.2 requires OPERABILITY of the control rod position indicators to determine control rod positions and, thereby, ensure compliance with the control rod alignment and insertion limits. The OPERABILITY, including position indication, of the shutdown and control rods is an initial assumption in all safety analyses that assume rod insertion upon reactor trip.

The objectives of the control rod system are to ensure that control rod alignment and insertion limits are maintained, acceptable power distributions as well as minimum shutdown margins are maintained, and that the potential effects of rod misalignment on associated accidents are limited.

The control rod in question is C-9, which is a shutdown bank A rod. This control rod is required to be fully withdrawn when the reactor is critical. In order to evaluate the proposed TS changes, the following conditions were considered: rod drop or rod misalignment during power operation, rod drop or rod misalignment during reactor startup, and a reactor trip. These are the only

conditions that need to be considered since control rod C-9 will be fully withdrawn at all other times that the TS is applicable.

A full rod drop of control rod C-9 during power operation would be detectable by indications other than the position indication system. Such an event would cause an urgent failure alarm and a noticeable change in the core parameters as evident by the response of the excore detectors. Thus, the status of control rod C-9's individual rod position indication would not affect the operator actions. Similarly, a rod misalignment, greater than that analyzed for, would also be detected by an urgent failure alarm and the response by the excore detectors. Therefore, the likelihood of an undetected rod drop or misalignment is considered negligible.

In addition to the analysis provided in the submittal of July 29, 2002, FPL has revised the Shutdown Margin Calculation 0-OP-028.2, to ensure that shutdown margin limits continue to be met for the remainder of this cycle. The use of the alternate methodology requires that the pertinent procedures are modified to account for the inoperable RPI. FPL has indicated that additional training, including operator training with the instrumentation required for the alternate methodology, will be provided to the reactor operators and technicians to assure familiarity with new plant conditions and modified procedures.

FPL has determined that the objectives stated above can be met with an inoperable RPI in a shutdown bank without subjecting the movable incore system to unnecessary additional wear. FPL stated in its submittal that it has installed a recorder to track parameters of the stationary gripper coil of the CRDM on the non-indicating rod. FPL also intends to verify every 8 hours that the coil has not changed state. This 8-hour surveillance period is consistent with the current compensatory operational requirements for control rod C-9 position determination.

The NRC staff has reviewed all the material submitted and performed an assessment of the conditions. The staff agrees that personnel safety concerns and maintaining personnel dose as low as reasonablely achievable prevent safe completion of repairs with the reactor at power and that constant use of the incore detector system is not advisable. The proposed TS changes provide adequate controls to ensure that the rod position is known and that any rod misalignment is detectable. Since the increase in the likelihood of an undetected rod drop or misalignment is determined to be negligible, the integrity of the accident analysis is maintained.

The staff concurs with the licensee's analysis and conclusions regarding the use of an alternate method to monitor the RPI associated with control rod C-9. Based on the licensee's submittal and additional information provided, the staff acknowledges the necessity for a repair of the installed RPI for control rod C9 as soon as reasonably achievable and, therefore, concurs that the performance of the repair be conducted at the next outage of sufficient duration or during the upcoming refueling outage, whichever comes first. Based on the above, the staff concludes that the proposed TS changes, applicable to control rod C-9 only for the remainder of Cycle 20, are acceptable.

4.0 STATEMENT OF EXIGENT CIRCUMSTANCES

The Commission's regulation, as stated in 10 CFR 50.91, provides special exceptions for the issuance of amendments when the usual 30-day public notice cannot be met. One type of special exception is an exigency. An exigency exists when the staff and the licensee need to act quickly and time does not permit the staff to publish a *Federal Register* notice allowing

Mr. J. A. Stall
Florida Power and Light Company

TURKEY POINT PLANT

cc:
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PD II-2 DOCUMENT COVER PAGE

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SUBJECT: Correction letter for TP4 Exigent Amendment

ORIGINATOR: E. Brown

SECRETARY: Marilyn Wohl

DATE: September 10, 2002

●●● ROUTING LIST ●●●

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