May 25, 2005

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: TURKEY POINT PLANT, UNIT 3 AND 4 - REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED LICENSE AMENDMENT FOR THE ADOPTION OF TSTF-095 (TAC NOS. MC6029 AND MC6030)

Dear Mr. Stall:

By letter dated January 20, 2005, Florida Power & Light Company submitted requests to amend the Operating Licenses for Turkey Point, Units 3 and 4. The proposed amendments revise the Technical Specifications to incorporate, among other items, the Technical Specification Task Force (TSTF) Traveler 95 (TSTF-95), "Revise completion time for reducing Power Range High trip setpoint from 8 to 72 hours."

The U.S. Nuclear Regulatory Commission staff has reviewed your submittal and finds that a response to the enclosed Request for Additional Information is needed before we can complete the review.

This request was discussed with Mr. Ronald Everett of your staff on May 25, 2005, and it was agreed that a response would be provided by June 30, 2005.

If you have any questions, please contact Mr. Jose Arroyo at (301) 415-2149.

Sincerely,

/RA JArroyo for/

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

Docket Nos. 50-250 and 50-251

Enclosure: As stated

cc w/encl: See next page

## TURKEY POINT PLANT

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

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This request was discussed with Mr. Ronald Everett of your staff on May 25, 2005, and it was agreed that a response would be provided by June 30, 2005.

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

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Enclosure: As stated

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## **REQUEST FOR ADDITIONAL INFORMATION**

## TSTF-095 ADOPTION REQUEST

# FLORIDA POWER AND LIGHT

## TURKEY POINT, UNITS 3 AND 4

## DOCKET NOS. 50-250 AND 50-25

By letter dated January 20, 2005, Florida Power & Light Company (FPL) submitted requests to amend the Operating Licenses for Turkey Point, Units 3 and 4. The proposed amendments revise the Technical Specifications (TSs) to incorporate, among other items, the TS Task Force (TSTF) Traveler 95 (TSTF-95), "Revise completion time for reducing Power Range High trip setpoint from 8 to 72 hours."

By letter dated September 27, 1996, the U.S. Nuclear Regulatory Commission (NRC) approved TSTF-95 as generic change to NUREG-1431, "Standard Technical Specifications Westinghouse Plants." TSTF-95 extended the completion time for changing the Power Range Neutron Flux - High trip setpoints when the setpoint changes were associated with power reductions directed by TSs 3.2.1, "Heat Flux Hot Channel Factor" and 3.2.2, "Nuclear Enthalpy Rise Hot Channel Factor." TSTF-95 has two main rationales for extending the completion time: (1) 36 hours to ". . . allow time to perform a second flux map to confirm the results, or determine that the condition was temporary . . .," and (2) 18 hours for the actual physical changing of the plant equipment.

In its letter, FPL requested that TSTF-95 be considered applicable to four TSs not discussed in TSTF-95: (1) 3.1.3, "Movable Control Assemblies," (2) 3.2.1, "Axial Flux Difference [AFD]," (3) 3.2.4, "Quadrant Power Tilt Ratio [QPTR]," and (4) 3.3.1, "Reactor Trip System Instrumentation."

The NRC staff has reviewed your submittal and finds that a response to the following items is needed before we can complete the review.

1. Technical Specification 3.1.3 is based on equipment malfunction rather than a core parameter being out of specification. Accordingly, there is no readily apparent need to "... allow time to perform a second flux map to confirm the results, or determine that the condition was temporary ..." Hence, it is not clear how TSTF-95 is applicable to this TS.

Please provide an analysis which shows how TSTF-95 is applicable to TS 3.1.3, include temporary conditions, time requirements for data acquisition and analysis, and justification to wait for that analysis. Include comparisons to Heat Flux Hot Channel Factor and Nuclear Enthalpy Rise Hot Channel Factor.

Absent such an analysis, please provide an analysis which justifies extending the completion time for adjusting the Power Range Neutron Flux - High trip setpoints for TS 3.1.3

It is noted that a misaligned rod may adversely impact core flux. The action requiring verification of Heat Flux Hot Channel Factor and Nuclear Enthalpy Rise Hot Channel Factor within 72 hours addresses those concerns.

2. TS 3.2.1 is based on a core parameter being out of specification. Given a relationship between AFD and core flux there may be a reason to ". . . allow time to perform a second flux map to confirm the results, or determine that the condition was temporary . . ."

Please provide an analysis which shows how TSTF-95 can be applied to TS 3.2.1, include temporary conditions, time requirements for data acquisition and analysis, and justification to wait for that analysis. Include comparisons to Heat Flux Hot Channel Factor and Nuclear Enthalpy Rise Hot Channel Factor.

Absent such an analysis, please provide an analysis which justifies extending the completion time for adjusting the Power Range Neutron Flux - High trip setpoints for TS 3.2.1.

3. TS 3.2.4 is based on a core parameter being out of specification. Given a relationship between QPTR and core flux there may be a reason to "... allow time to perform a second flux map to confirm the results, or determine that the condition was temporary ..."

Please provide an analysis which shows how TSTF-95 can be applied to TS 3.2.4, include temporary conditions, time requirements for data acquisition and analysis, and justification to wait for that analysis. Include comparisons to Heat Flux Hot Channel Factor and Nuclear Enthalpy Rise Hot Channel Factor.

Absent such an analysis, please provide an analysis which justifies extending the completion time for adjusting the Power Range Neutron Flux - High trip setpoints for TS 3.2.4.

4. TS 3.3.1 is based on equipment malfunction rather than a core parameter being out of specification. Accordingly, there is no readily apparent need to "... allow time to perform a second flux map to confirm the results, or determine that the condition was temporary ..." Hence, it is not clear how TSTF-95 is applicable to this TS.

Please provide an analysis which shows how TSTF-95 is applicable to TS 3.3.1, include temporary conditions, time requirements for data acquisition and analysis, and justification to wait for that analysis. Include comparisons to Heat Flux Hot Channel Factor and Nuclear Enthalpy Rise Hot Channel Factor.

Absent such an analysis, please provide an analysis which justifies extending the completion time for adjusting the Power Range Neutron Flux - High trip setpoints for TS 3.3.1.

5. TS 3.7.1, "Main Steam Safety Valves," requires a reduction in reactor power and subsequent alteration of Power Range Neutron Flux - High trip setpoints within 4 hours. Please explain how the licensee is able to the time requirement for this item.