

August 31, 2006

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 NUCLEAR PLANT, UNITS 3 AND 4 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING STEAM GENERATOR TUBE
INTEGRITY TECHNICAL SPECIFICATION AMENDMENT REQUEST
(TAC NOS. MD1389 AND MD1390)

Dear Mr. Stall:

By letter dated April 27, 2006, Florida Power & Light Company requested amendments to the technical specifications (TSs) for Turkey Point Nuclear Plant, Units 3 and 4, regarding steam generator tube integrity, based on TS Task Force traveler TSTF-449.

The U.S. Nuclear Regulatory Commission staff has reviewed your requests 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 members of your staff and on August 24, 2006, Ms. Olga Hanek agreed that a response would be provided by October 16, 2006. If you have any questions, please contact me at (301) 415-3974.

Sincerely,

/RA/

Brendan T. Moroney, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

TURKEY POINT NUCLEAR PLANT, UNIT NOS. 3 AND 4

STEAM GENERATOR TUBE INTEGRITY TECHNICAL SPECIFICATION AMENDMENT

DOCKET NOS. 50-250 AND 50-251

By letter dated April 27, 2006, Florida Power & Light Company requested an amendment to the Turkey Point Nuclear Plant, Units 3 and 4, technical specifications (TSs) regarding steam generator (SG) tube integrity, based on TS Task Force traveler TSTF-449.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed this request and finds that the following additional information is needed to complete the review.

1. On pages 6 and 15 of Enclosure 2, the proposed revisions to TS Table 3.3-4, Action 26-3, and TS 3.4.6.1, Action a.3, add the statement "*per Surveillance Requirement 4.4.6.2.1.c.*" The purpose of adding this statement is not clear since Surveillance Requirement (SR) 4.4.6.2.1.c has no additional details. In addition, the proposed revisions to these action statements require the Reactor Coolant System (RCS) water inventory balance to be performed at least once per 8 hours, which appears to conflict with the 24-hour requirement in the current SR 4.4.6.2.1.c and the proposed 72 hours in the current application. Please explain the purpose of adding this statement or discuss your plans to remove it.
2. On page 17 of Enclosure 2, the proposed revision to SR 4.4.6.2.1.c changes the frequency of performing the RCS water inventory balance from 24 to 72 hours. Even though TSTF-449 states a frequency of 72 hours, this change must be justified on a plant-specific basis. Please provide a technical justification for why this change is acceptable for Turkey Point or modify your proposed TS to be consistent with your current TS with respect to this issue.
3. The current Bases for TS 3/4.4.4.6.2 (as shown on page 4 of Enclosure 4) states that the dosage contribution from the tube leakage will be limited to a small fraction of Title 10, *Code of Federal Regulations* (10 CFR), Part 100 dose guideline values. However, on pages 7 and 12 of Enclosure 4, the proposed Bases state that the dose consequences are within the limits of 10 CFR Part 100 as well as 10 CFR Part 50.67. Please clarify whether the current NRC approved accident source term is based on Part 100 (which is referenced in the current TS Bases), Part 50.67, or both?
4. It is the NRC staff's understanding that the accident analysis for Turkey Point assumes that accident induced leakage does not exceed 500 gallons per day (gpd) in any one of the three SGs and the total leakage from all SGs does not exceed 1 gallon per minute (gpm) at accident conditions. There are five instances (pages 7, 8, 12, 13, and 18 of Enclosure 4) where the accident induced leakage assumption is cited in the Bases. The accident analysis assumptions discussed on these pages vary and in some cases could be potentially misinterpreted. Please confirm the staff's understanding of your accident analysis assumptions concerning primary-to-secondary leakage and discuss your plans

Enclosure

to modify the proposed Bases to more clearly define your accident analysis leakage assumptions. In addition, on page 13 of Enclosure 4, there is a statement that the 500 gpd primary-to-secondary leakage in each SG at accident conditions is relatively inconsequential. This statement appears to contradict the previous paragraph and other portions of your submittal. Please clarify.

5. On page 8 of Enclosure 4, the last sentence of the third paragraph states that the accident induced leakage rate assumption conservatively bounds the expected total accident primary-to-secondary leakage based on the allowable operational leakage rate as an initial condition and considers any leakage changes as a result of the accident induced changes in primary-to-secondary pressure differential. This statement appears to imply that, by satisfying the operating leakage limit, the accident induced leakage limit would never be exceeded. Since operating experience indicates that this is not the case, please discuss your plans to remove or modify this statement. In addition, discuss your plans to include the definition of accident induced leakage into the Bases. The definition is in TSTF-449 (The accident induced leakage rate includes any primary to secondary leakage existing prior to the accident in addition to primary to secondary leakage induced during the accident).
6. On pages 14 and 17 of Enclosure 4, there appear to be two typographical errors. The first is under the paragraph for "IDENTIFIED LEAKAGE" toward the end of the first sentence. The sentence reads: ". . . and is well **with in** the capability . . ." The sentence should read: ". . . and is well **within** the capability . . ." The second one is under the list of "References." Reference 6 should be 10 CFR 50.67 instead of 10 CFR 50.76.
7. On page 17 of Enclosure 4, you stated that the 150-gpd limit is measured at room temperature as described in Reference 1. Please confirm that this is the correct reference. In addition, discuss your plans to cite Reference 5 at this location since Reference 5 also discusses this issue.
8. There are several proposed changes to the Bases for the Reactor Coolant System leakage section that go beyond TSTF-449. Please confirm that all of the proposed changes are consistent with your current design and licensing bases. If they are not consistent, please provide a technical justification for the differences or discuss your plans to remove them.

Mr. J. A. Stall
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