NRC Request to 10 CFR 50.59 Reviews Performed
For Implementation of Compensatory Measures for Boraflex Degradation

NRC Request

Provide the 10 CFR 50.59 review performed for the compensatory measures implemented in the Unit 3 SFP.

FPL Response

At the time of the implementation of the Boraflex compensatory actions (2001 and 2003), the existing regulatory guidance for addressing a degraded, non-conforming condition was Generic Letter (GL) 91-18, Rev. 1 (subsequently replaced by RIS 2005-20, Rev. 1). GL 91-18, Rev. 1 and NEI 96-07, Rev. 1 (endorsed by RG 1.187), "Guidelines for 10 CFR 50.59 Safety Evaluations," provide similar guidance related to applicability of 10 CFR 50.59 with respect to the use of compensatory actions in response to degraded and nonconforming conditions. This guidance specifies that:

> "If an interim compensatory action is taken to address the condition and involves a procedure change or temporary modification, a 10 CFR 50.59 review should be conducted and may result in a safety evaluation. The intent of this 10 CFR 50.59 review is to determine whether the compensatory action itself (not the degraded condition) impacts other aspects of the facility described in the SAR."

The compensatory measures implemented following FPL's determination that the SFP was in a degraded, non-conforming condition (Turkey Point Condition Report CR 01-0234) were considered interim compensatory actions consistent with GL 91-18, Rev. 1. These measures were also reviewed in accordance with 10 CFR 50.59. In accordance with GL 91-18, Rev. 1, the compensatory measures themselves were analyzed to enhance the reactivity control capability of the SFP and provide reasonable assurance of satisfying the Keff requirements of Keff < 1.0 with unborated water. The 10 CFR 50.59 reviews were intended to focus on impact of the implementation of the compensatory measures on other aspects of the facility. The compensatory measures employed administrative controls using existing components in the SFP (fuel assemblies of specific initial enrichment and burunp combinations, empty storage cells and Rod Cluster Control Assemblies (RCCAs)) for each of which the SFP was designed. Accordingly, the implementation of the compensatory measures would have no adverse impact on the facility as described in the UFSAR.

FPL performed the following 10 CFR 50.59 screenings in support of the implementation of these compensatory measures:

- 2001: Implementation of the Region II checkerboard configuration in the high duty storage rack module. From the corrective actions in CR 01-0234, evaluation PTN-ENG-SEFJ-01-012, Rev. 0 developed the checkerboard configuration to compensate for the loss of all the Boraflex in the array and eliminate the need to credit Boraflex in this configuration. Also as part of the corrective actions Turkey

NRC Request to 10 CFR 50.59 Reviews Performed
For Implementation of Compensatory Measures for Boraflex Degradation

Point procedure 0-ADM-556 was revised to implement this compensatory measures and included a 10 CFR 50.59 review in support of the change.

- 2003: Implementation of Region II storage configurations crediting RCCAs to compensate for the loss of Boraflex. Evaluation PTN-ENG-SEFJ-03-008, Rev. 0 developed these configurations and included a 10 CFR 50.59 screening in support of implementation.

- 2010: PTN-ENG-SEFJ-10-004, Rev. 0, provided an UFSAR update for the compensatory measures previously implemented in 2001 and 2003 as discussed above. Although these compensatory measures were reviewed (screened) in accordance with 10 CFR 50.59 at the time of their implementation, a 10 CFR 50.59 review is included in PTN-ENG-SEFJ-10-004, Rev. 0 to update those reviews.

Copies of these 10 CFR 50.59 screening reviews are provided with this response.

Enclosures:

1. 2001, Turkey Point Procedure 0-ADM-556 revision, 10CFR 50.59 Review (4 pages)
2. 2003, Turkey Point Evaluation PTN-ENG-SEFJ-03-008, Rev. 0, 10 CFR 5.59 Review (2 pages)
3. 2010, Turkey Point Evaluation PTN-ENG-SEFJ-10-004, Rev. 0, 10 CFR 50.59 Review (3 pages)

Enclosure 1

2001 10 CFR 50.59 Review
4 pages

ORIGINATOR

REQUEST FOR PROCEDURE REVIEW

RTS No. 01 - 0243 (Year - Number)

1.a Procedure Title: FUEL ASSEMBLY AND INSERT SHUFFLES

Procedure Number: O-ADM-556 Current Revision Date: 3/8/01

Check One: ☐ Safety Related ☐ Quality Related ☐ Non-Safety Related RTS Change Code(s): CR 1 / /

1.b Procedure Number: Current Revision Date:

2. Request Type: ■ Proc Chg Req ☐ New Proc ☐ Periodic Review ☐ Cancellation ☐ Other ☐ TP No.

3. Commitment Source: ☐ NRC ☐ INPO ☐ PC/M No. ☐ QA/QC ☐ OTHER Commitment Date: 4/2/01 for ☐ Final Approval ☐ Distribution

☐ Permanently Incorporate OTSC No.

Reason for Request: INCORPORATE SPP RESTRICTIONS PER CR 01-0234

4. Describe Details of Request: (• List affected pages or attach entire procedure.) (• If no changes are recommended as a result of a periodic review, write NONE.)

SEE ATTACHED

5. Is request due to a PC/M? ☐ Yes ■ No Does request affect an As Left valve/breaker alignment? ☐ Yes ■ No

Does Request affect the Scheduled Surveillances referenced in O-ADM-215 or O-ADM-218? ☐ Yes ☐ No

Originated by: _____ (Signature) MITCHELL S. ARMS (Print) ENG (Department) Date: 4/5/01

Phone extension: 6673

Check One: ■ No Basis Document ☐ No Basis Document change necessary ☐ Basis Document change necessary and attached

6. Safety Review: (Complete Page 3 of this Form 457 to document the 10 CFR 50.59 Safety Review prior to signing this Block)

Safety Review by: Robert J. Tomonto (Signature) Robert Tomonto (Print) Date: 4/5/01

7. Reviewed by: N/A (Signature) _____ (Print) Date:

Responsible System Engineer when applicable.

8. Administrative/Operations /Maintenance Procedures Group (Ensure all required reviews are complete (except PNSC) and all comments are resolved prior to signing this block)

Reviewed by: _____ (Signature) T. A. Finn (Print) Date 4/5/01

Word Processing Complete

PNSC Review, Plant General Manager Approval Required. ☒ Yes ☐ No

9. Approved by: Robert Tomonto (Signature) R. J. Tomonto (Print) 4/5/01 (Date)

Responsible Dept Head 4/5/01

10. Reviewed by PNSC/Subcommittee No. 01-041 Date:

Approved by: _____

Plant General Manager or Protection Services Manager (for Security Implementing Procedures)

11. Change Request Disposition/Status: ☒ Approved ☐ Cancelled ☐ Tabled (see attached form F-096) Date:

☐ Immediate Distribution Required (as required per QI 6-PTN-1) Date:

☐ Immediate Implementation Required (as required per QI 6-PTN-1)

12.a If change is due to PC/M OR affects an As Left valve/breaker alignment, sign prior to distribution: _____ (Responsible Dept) Date:

12.b If change affects the Scheduled Surveillances referenced in O-ADM-215 or O-ADM-218, sign prior to distribution: _____ (Surveillance Analyst) Date:

(0-ADM-100)

F-457:1 of3 (8/10/00)

Enclosure 6

REQUEST FOR PROCEDURE REVIEW

RTS No. 01 - 0243 (Year - Number)

ORIGINATOR

1.a Procedure Title: FUEL ASSEMBLY AND INSERT SHUFFLES

Procedure Number: O-ADM-556 Current Revision Date: 3/8/01

Check One: ☐ Safety Related ☐ Quality Related ☐ Non-Safety Related RTS Change Code(s): CR / / /

1.b Procedure Number: _____ Current Revision Date: _____

2. Request Type: ■ Proc Chg Req ☐ Periodic Review ☐ Other _____
☐ New Proc ☐ Cancellation ☐ TP No. _____

3. Commitment ☐ NRC ☐ INPO ☐ PC/M No. _____ Commitment Date: 4/2/01
Source: ☐ QA/QC ☐ OTHER _____ for ☐ Final Approval ☐ Distribution
Reason for Request: INCORPORATE SFP RESTRICTIONS PER CR 01-0234

☐ Permanently Incorporate OTSC No. _____

4. Describe Details of Request: (• List affected pages or attach entire procedure.) (• If no changes are recommended as a result of a periodic review, write NONE.)
SEE ATTACHED

5. Is request due to a PC/M? ☐ Yes ■ No Does request affect an As Left valve/breaker alignment? ☐ Yes ■ No
Does Request affect the Scheduled Surveillances referenced in O-ADM-215 or O-ADM-218? ☐ Yes ☐ No
Originated by: _____ (Signature) MITCHELL S. SMITH (Print) ENG (Department) Date: 4/5/01
Phone extension: 6673
Check One: ■ No Basis Document ☐ No Basis Document change necessary ☐ Basis Document change necessary and attached

6. Safety Review: (Complete Page 3 of this Form 457 to document the 10 CFR 50.59 Safety Review prior to signing this Block)
Safety Review by: Robert J. Tomanto (Signature) Robert Tomanto (Print) Date: 4/5/01

7. Reviewed by: N/A (Signature) _____ (Print) Date: _____
Responsible System Engineer when applicable.

8. Administrative/Operations /Maintenance Procedures Group
(Ensure all required reviews are complete (except PNSC) and all comments are resolved prior to signing this block)
Reviewed by: _____ (Signature) T.A. Finn (Print) Date 4/5/01
PNSC Review, Plant General Manager Approval Required. ☒ Yes ☐ No
Word Processing Complete _____

9. Approved by: _____ (Signature) _____ (Print) _____ (Date)
Responsible Dept Head

10. Reviewed by PNSC/Subcommittee No. _____
Approved by: _____ Date: _____
Plant General Manager or Protection Services Manager (for Security Implementing Procedures)

11. Change Request Disposition/Status: ☐ Approved ☐ Cancelled ☐ Tabled (see attached form F-096)
☐ Immediate Distribution Required (as required per QI 6-PTN-1) Date: _____
☐ Immediate Implementation Required (as required per QI 6-PTN-1) Date: _____

12.a If change is due to PC/M OR affects an As Left valve/breaker alignment, sign prior to distribution: _____ (Responsible Dept) Date: _____

12.b If change affects the Scheduled Surveillances referenced in O-ADM-215 or O-ADM-218, sign prior to distribution: _____ (Surveillance Analyst) Date: _____

Enclosure 6

10 CFR 50.59 SAFETY REVIEW

Procedure Number: O-ADM-556

RT S Number: _____

FSAR Sections Reviewed:

2.0 - Reactor
1.0 Introduction and Summary

Technical Specification Sections Reviewed:

3/4.9 Refueling Ops.
5.6 Fuel Storage

	YES	NO
A. Does this request change the facility or procedures as described in the FSAR?	☐	☑
B. Does this request involve a test or experiment not described in the FSAR?	☐	☑
C. Could this request affect nuclear safety in away not previously evaluated in the FSAR?	☐	☑
D. Is a change in Technical Specifications required?	☐	☑
E. Is a change in the Fire Protection Program, Subsection 5.6 of O-ADM-016 involved?	☐	☑
F. Is a change to the Off-Site Dose Calculation Manual Involved?	☐	☑
G. Does this request involve a change to the Environmental Protection Plan or a change, test or experiment that may affect the environment?	☐	☑

(If YES is checked for any question above, then refer to the instructions on the back of the Form 457 as applicable for necessary actions)

Provide Written Discussion Supporting Checklist Responses:

The proposed changes are made in response to a disposition to CR 01-0234, concerning boraflex integrity in the Unit 3 SFP. Specifically, the amount of degradation (loss of boraflex areal density) requires that the site add administrative controls in a selected SFP Region II rack. Additions to this procedure are made to ensure or establish the guidance necessary to generate the Fuel Handling Sheets.

The proposed changes to this procedure do not affect the ODCM, Fire Protection Program, Technical Spec's, and Environmental Protection Program.

Upon completion, this page shall be attached to Page I of Form 457.

PROCEDURE REVIEWER CHECKLIST

Procedure No: O-ADM-556 RTS No: _____

Complete this form for procedure revisions only.
Use Form 333 for new procedures (and new TPs).
Use Form 458 for OTSCs

	System Engineer			Responsible Department		
	Yes	No	N/A	Yes	No	N/A
1. Are the alignments in the procedure correct for the stated conditions and evolutions to be performed?			✓			✓
2. Does the procedure change comply with applicable Technical Specifications/FSAR requirements? List Tech Spec/FSAR sections reviewed.	////	////	////	✓		
a. Has the Reference Section been reviewed and updated to list the specific Technical Specification/FSAR section that is implemented by this procedure? [Commitment - Step 2.3.15]	////	////	////			✓
b. Has the procedure, section, or individual step that implements a Technical Specification/FSAR section been identified? (See O-ADM-101, Procedure Writer's Guide, Step 5.5.18) [Commitment - Step 2.3.15]	////	////	////			✓
3. Does the procedure meet the requirements of all applicable safety evaluations and JCOs?			✓			✓
4. Have all discrepancies and/or deficiencies in the plant operating diagrams or the breaker list that are associated with this procedure change been properly documented (CR written, or REA to Plant Change Control Group) ?			✓			✓
5. Are all breakers/valves that are added/deleted by the PC/M properly addressed by this change (N/A if change is not incorporating a PC/M)?			✓			✓
6. Are valve/breaker positions as required by the PC/M or procedure change?			✓			✓
7. Has field walkdown been performed?	////	////	////			✓
8. Has the Electronic Procedure Index been checked to determine if other procedure changes are in progress on the procedure being changed?	////	////	////	✓		////
9. Has the procedure been evaluated against the requirements of O-ADM-217 for infrequent evolutions? [Commitment - Step 2.3.6]	✓					✓
10. *Does the procedure revision require the backfitting of controlled plant documents?		✓	////		✓	////
11.*****Does this change request affect any figure in the Plant Curve Book?		✓	////		✓	////
12. **Does this change request affect the Scheduled Surveillances referenced in 0-ADM-215, Plant Surveillance Tracking Program, or O-ADM-218, Technical Specification Matrix?		✓	////		✓	Not Sure
13. ***Is change applicable to Normal Post Accident actions?		✓	////		✓	////
14. **** Is change applicable to an EOP, SAMG, or ONOP?		✓	////		✓	////

RTS 01-0100P

If any question 1 through 9 is checked NO, provide explanation in Remarks Section.

* If question 10 is checked YES, provide explanation in Remarks Section.

** If YES, a change to O-ADM-215 or O-ADM-218 shall be included with this procedure change for approval and the Surveillance Analyst shall sign Block 12.b of Form 457 prior to distribution. (If not sure, contact the Surveillance Analyst.).

*** If YES, review Post Accident Radiation Zone Maps (5610-M-721) for accessibility. If area is inaccessible Post Accident, then an Engineering and Operations Department Evaluation is required.

**** If question 14 is checked YES, the Operations Supervisor shall determine verification and validation requirements in accordance with O-ADM- I 10, Emergency and Off-Normal Operating Procedures Verification and Validation Plan. In addition, the System Engineer shall determine if the change affects Maintenance Rule scope requirements.

***** If YES, a Plant Curve Book Change, in accordance with O-ADM-554, Plant Curve Book, shall be included with this procedure change for approval.

REMARKS:

System/Component Engineer	(Signature)	MITCHELL S. BAILEY (Print)	4/5/01 (Date)
Responsible Dept. Reviewer	Robert Tomonto (Signature)	Robert J. Tomonto (Print)	4/5/01 (Date)

Enclosure 2

2003 10 CFR 50.59 Review
2 pages

10.0 10 CFR 50.59 APPLICABILITY DETERMINATION

Document Number: PTN-BNC-98FJ-03-000 **Revision Number:** 0
Title: Acceptable Region 2 Fuel Storage Configurations to Mitigate the Absence of Boraflex

Brief Description of activity: Determine alternative SFP storage configurations to mitigate operational problems with moving fuel to satisfy degraded Boraflex storage requirements specified in O-ADM-536.

Address the questions below for all aspects of the activity. If the answer is **YES** for any portion of the activity, apply the identified process(es) to that portion of the activity. Note that it is not unusual to have more than one process apply to a given activity.

See Section 4 of the "Guidance For Performing 10 CFR 50.59 Evaluations".

I.	Does the proposed activity involve a change to the:		See Section 4.2.1 of the Guidance Manual.
	1. Technical Specifications or Operating License?	✓ NO ___ YES	If YES process License Amendment Request in accordance with 10 CFR 50.90.
	2. Quality Assurance Plan, Security Plan, Emergency Plan, IST Program Plan, or ISI Program Plan?	✓ NO ___ YES	If YES process change in accordance with 10 CFR 50.54 or 10 CFR 50.55 as applicable.
	3. Fire Protection Program?	✓ NO ___ YES	If YES process per Fire Protection Program changes.
II.	Does the Proposed activity involve maintenance which restores SSCs to their original condition or involve a temporary system alteration (TSA) supporting maintenance that will be in effect during at-power operations for 90 days or less?	✓ NO ___ YES	See Section 4.2.2 of the Guidance Manual.
III.	Does the proposed activity involve a change to the UFSAR (including documents *incorporated by reference*) excluded from requirement to perform a 10 CFR 50.59 review by Section 4.2.3 of the Guidance Manual?	✓ NO ___ YES	If YES ensure FSAR User Comment Form completed.
IV.	Does the proposed activity involve a change to managerial or administrative procedures governing the conduct of facility operations?	✓ NO ___ YES	See Section 4.2.4 of the Guidance Manual.
V.	Does the activity impact other plant specific programs (e.g., the ODCM) which are controlled by regulations, the Operating License or Tech Specs?	✓ NO ___ YES	If YES process per Technical Specifications and Program requirements (See Section 4.2.1 of the Guidance Manual).

___ All aspects of the activity are controlled by one or more of the processes above, therefore a 10 CFR 50.59 review is <u>not</u> required, complete form by signing page 2.

✓ If the activity or any portion of the activity is not controlled by one or more of the processes above, complete the 10 CFR 50.59 Screen.

10 CFR 50.59 SCREEN

10 CFR 50.59 Screening Questions (See Section 5.2.2 of the Guidance Manual for additional guidance):

1.	Does the proposed activity require a change to the Technical Specifications?	✓ NO ___ YES
	If YES, then request and receive a License Amendment prior to implementation of the activity.	
2.	Does the proposed activity involve a change to an SSC that adversely affects an UFSAR described *design function*?	✓ NO ___ YES
3.	Does the proposed activity involve a change to a procedure that adversely affects how UFSAR described SSC design functions are performed or controlled?	✓ NO ___ YES
4.	Does the proposed activity involve revising or replacing an UFSAR described evaluation methodology that is used in establishing the *design bases* or used in the *safety analyses*?	✓ NO ___ YES
5.	Does the proposed activity involve a *test or experiment not described in the UFSAR*, where an SSC is utilized or controlled in a manner that is outside the reference bounds of the design for that SSC or is inconsistent with analyses or descriptions in the UFSAR?	✓ NO ___ YES
	If question 2, 3, 4 or 5 is answered YES, then a 10 CFR 50.59 Evaluation shall be performed.	

List the documents (UFSAR, Technical Specifications, and other documents) reviewed as applicable: T.S. 3/4.9.14, 5.6.1, UFSAR Appendix 14D, and 0-ADM-556.

Screening Justification:

The evaluation justifies the uses of additional Region 2 SFP storage configurations that satisfy the original safety criteria established in Reference 3. The basic method of calculation has not changed and it has been demonstrated that the FPL calculation yields similar results to the analysis performed in Reference 3.

Preparer: Ed Knuckles (Print Name) [signature] (Sign) Date: 3 / 14 /2003

Enclosure 3

2010 10 CFR 50.59 Review
3 pages

10CFR50.59 APPLICABILITY DETERMINATION

Document Number: PTN-ENG-SEFJ-10-004 Revision Number: 0

Title: Compensatory Measures for Degraded Boraflex in the Turkey Point Unit 3 & 4 SFP.

Brief Description of Activity: This evaluation describes the measures established to compensate for the loss of Boraflex in the Turkey Point Units 3 and 4 spent fuel pools (SFP). These compensatory measures were established to address the degraded and nonconforming condition of the Boraflex panels in the Unit 3 SFP. The degraded and nonconforming condition of the Boraflex panels in the Unit 3 SFP is being tracked as a RIS 2005-20, Rev. 1 (formerly Generic Letter (GL) 91-18) issue in CR 2007-40769. The compensatory measures use empty storage cells and/or RCCAs to provide sufficient negative reactivity to compensate for the loss of Boraflex. The 10 CFR 50.59 review is performed consistent with the guidance of NEI 96-07, "Guidelines for 10 CFR 50.59 Safety Evaluations for compensatory measures that have been implemented in response to a degraded and nonconforming condition. This guidance is shown below.

> "If an interim compensatory action is taken to address the condition and involves a procedure change or temporary modification, a 10 CFR 50.59 review should be conducted and may result in a safety evaluation. The intent is to determine whether the compensatory action itself (not the degraded condition) impacts other aspects of the facility described in the SAR."

This 10 CFR 50.59 review will focus on any ancillary impacts that the compensatory measures (empty storage cells or RCCAs) used in the SFP may have on the facility as described in the UFSAR.

Address the questions below for all aspects of the activity. If the answer is **YES** for any portion of the activity, apply the identified process(es) to that portion of the activity. Note that it is not unusual to have more than one process apply to a given activity. See the "Guidance For Performing 10CFR50.59 Evaluations" for additional guidance. The guidance document can be accessed in Lotus Notes from the JB Nuclear Notes Page by selecting the following: Procedures / Engineering.

10CFR50.59 Applicability Determination.

I. Does the proposed activity involve a change to the:		See Section 4.2.1 of the Guidance Manual.
1. Technical Specifications or Operating License?	☒ NO ☐ YES	If YES, process License Amendment Request in accordance with 10CFR50.90.
2. Quality Assurance Plan, Security Plan, Emergency Plan, IST Program Plan, or ISI Program Plan?	☒ NO ☐ YES	If YES, process change in accordance with 10CFR50.54 or 10CFR50.55 as applicable.
3. Fire Protection Program?	☒ NO ☐ YES	If YES, process per Fire Protection Program changes.
II. Does the Proposed activity involve maintenance which restores SSCs to their original condition or involve a temporary alteration (e.g., TSA / ECO) supporting maintenance that will be in effect during **at-power** operations for 90 days or less?	☒ NO ☐ YES	See Section 4.2.2 of the Guidance Manual.
III. Does the proposed activity involve a change to the UFSAR (including documents incorporated by reference) excluded from requirement to perform a 10CFR50.59 review by Section 4.2.3 of the Guidance Manual?	☒ NO ☐ YES	If YES, ensure FSAR User Comment Form completed.
IV. Does the proposed activity involve a change to managerial or administrative procedures governing the conduct of facility operations?	☒ NO ☐ YES	See Section 4.2.4 of the Guidance Manual.
V. Does the activity impact other plant specific programs (e.g., the ODCM) which are controlled by regulations, the Operating License or Tech Specs?	☒ NO ☐ YES	If YES, process per Technical Specifications and Program requirements (See Section 4.2.1 of the Guidance Manual).

☐ All aspects of the activity are controlled by one or more of the processes above, therefore a 10CFR50.59 screening is not required.

Basis:

Complete the form by printing name, signing, and dating the form.

☒ If the activity or any portion of the activity is not controlled by one or more of the processes above, complete the 10CFR50.59 Screening.

☐ Entire activity subject to screening.

☒ Portion of activity subject to screening.
Explain: The ancillary impacts of the compensatory measures are the focus of the screening.

10CFR50.59 SCREEN

10CFR50.59 Screening (See Section 5.2.2 of the Guidance Manual for additional guidance):

1. Does the proposed activity require a change to the Technical Specifications? *Justification:* The compensatory measures use empty storage cells or RCCAs to compensate for the loss of Boraflex to satisfy the K_{eff} requirements of Technical Specifications (TS) 5.5.1.1.a and 5.5.1.1.b. As discussed in UFSAR Section 9.5.2.2, the SFP is designed to have the SFP storage cells either empty or fully filled with up to 1535 spent fuel assemblies. As discussed in UFSAR 9.5.4.2, the SFP is designed to store RCCAs in the stored fuel assemblies. The specific measures used to accommodate the on-going degradation of Boraflex are nowhere described or prohibited in TS. No compensatory measure implemented to accommodate degradation of Boraflex causes neutron multiplication in the SFP racks, or in the array of stored fuel, to exceed regulatory limits. The analysis of the impacts of the compensatory measures show that cell degradation (assuming no Boraflex) still meets the criticality licensing basis with the specified storage restrictions. The implementation of these compensatory measures resulted in a situation in which administrative controls more restrictive than TS are being employed in the SFP to ensure the K_{eff} criteria of TS 5.5.1.1.a and 5.5.1.1.b are satisfied. However, NRC Administrative Letter (AL) 98-10 applies to the storage restrictions described in this activity. Since this addresses a degraded and nonconforming condition, it is being tracked as a GL-91-18 issue in CR 2007-40769. CR 2007-40769 is tracking the implementation of approved Amendments 234 & 229, and AL 98-10 will apply until Amendments 234 & 229 are implemented. As a result of difficulties in implementing Amendments 234 & 229, LAR 204 (L-2010-035) was submitted to address the AL 98-10 TS issues for Unit 3 and License Condition H(b) requires a LAR to be submitted this year to address the AL 98-10 TS issues for Unit 4. These actions are being tracked by CR 2010-555 and CR 2009-32621 for Units 3 and 4, respectively. Since this is an AL 98-10 issue, a change to the TS is required. However, NRC approval prior to implementation of the activity is not required.	☐ NO ☒ YES
~~If YES, then request and receive a License Amendment prior to implementation of the activity.~~	
2. Does the proposed activity involve a change to an SSC that adversely affects an UFSAR described design function? *Justification:* The compensatory measures use empty storage cells or RCCAs to compensate for the loss of Boraflex to satisfy the K_{eff} requirements of TS 5.5.1.1.a and 5.5.1.1.b. As discussed in UFSAR Section 9.5.2.2, the SFP is designed to have the SFP storage cells either empty or fully filled with up to 1535 spent fuel assemblies. As discussed in UFSAR 9.5.4.2, the SFP is designed to store RCCAs in the stored fuel assemblies. Both Region I and Region II storage racks are designed to maintain discharged fuel in a subcritical array, without incurring damage during an off-normal or seismic-induced event and to provide adequate cooling for the stored spent fuel. Thus, the racks perform a passive function. Rack dimensions and clearances are not changed, so that the physical act of re-positioning fuel, here or elsewhere in the racks, is not made more difficult. While Boraflex present in certain areas, including Region I and II cells, may have degraded beyond acceptable criteria for continuing credit as a neutron absorber, geometric arrangement of the Region I and II rack cells, along with reactivity characteristics (i.e., initial enrichment, burnup and post-irradiation cooling time) of the stored fuel and the use of RCCAs, ensure continued functionality of these rack locations. The compensatory measures used to accommodate Boraflex degradation do not change the array of stored fuel in any fashion that would render it more vulnerable to seismic disturbance or a mechanically-induced off-normal event or impede SFP cooling. As demonstrated by the comparative analysis, the compensatory measures provide negative reactivity such that there is sufficient margin to assure that the K_{eff} criteria are satisfied when the conservative allowance for biases and uncertainties, as described in the UFSAR, are applied. Accordingly, the regulatory requirements with respect to Keff in the storage racks continue to be met. Therefore, the implementation of these compensatory measures does not adversely affect an UFSAR described design function.	☒ NO ☐ YES

3. Does the proposed activity involve a change to a procedure that adversely affects how UFSAR described SSC design functions are performed or controlled? *Justification:* The compensatory measures use empty storage cells or RCCAs to compensate for the loss of Boraflex to satisfy the K_{eff} requirements of TS 5.5.1.1.a and 5.5.1.1.b. As discussed in UFSAR Section 9.5.2.2, the SFP is designed to have the SFP storage cells either empty or fully filled with up to 1535 spent fuel assemblies. As discussed in UFSAR 9.5.4.2, the SFP is designed to store RCCAs in the stored fuel assemblies. These compensatory measures do not adversely affect how the installed racks perform their function of controlling neutron multiplication in the array of stored fuel, or adversely affect how racks protect the stored fuel from damage. Storage racks are designed to safely store fresh and irradiated fuel; they will continue to do so after any required procedure changes are made. Rack dimensions and clearances are not changed, so that the physical act of re-positioning fuel, here or elsewhere in the racks, is not made more difficult. The compensatory measures do not adversely impact how the SFP is controlled to segregate storage of fuel assemblies between Region I and Region II via the burnup requirements of TS 3.9.14 which is maintained, but impose additional restrictions for the storage of fuel in the SFP racks to address the degraded conditon of the Boraflex. Therefore the implementation of these compensatory measures does not involve a change to procedures that would adversely affect how UFSAR described functions are performed or controlled.	☒NO ☐ YES
4. Does the proposed activity involve revising or replacing an UFSAR described evaluation methodology that is used in establishing the design bases or used in the safety analyses? *Justification:* The compensatory measures use empty storage cells or RCCAs to compensate for the loss of Boraflex to satisfy the K_{eff} requirements of TS 5.5.1.1.a and 5.5.1.1.b. As discussed in UFSAR Section 9.5.2.2, the SFP is designed to have the SFP storage cells either empty or fully filled with up to 1535 spent fuel assemblies. As discussed in UFSAR 9.5.4.2, the SFP is designed to store RCCAs in the stored fuel assemblies. No method of evaluation is required to be revised or replaced to have empty storage cells or RCCAs in the SFP. Therefore, the implementation of these compensatory measures does not involve revising or replacing an UFSAR described evaluation methodology that is used in establishing the design bases or used in the safety analyses.	☒NO ☐ YES
5. Does the proposed activity involve a test or experiment not described in the UFSAR, where an SSC is utilized or controlled in a manner that is outside the reference bounds of the design for that SSC or is inconsistent with analyses or descriptions in the UFSAR? *Justification:* The compensatory measures use empty storage cells or RCCAs to compensate for the loss of Boraflex to satisfy the K_{eff} requirements of TS 5.5.1.1.a and 5.5.1.1.b. As discussed in UFSAR Section 9.5.2.2, the SFP is designed to have the SFP storage cells either empty or fully filled with up to 1535 spent fuel assemblies. As discussed in UFSAR 9.5.4.2, the SFP is designed to store RCCAs in the stored fuel assemblies. None of the compensatory measures considered here involves a test or experiment. The compensatory measures evaluated in this screening document do not increase or expand design basis requirements for the fuel pool racks, or the contained irradiated fuel. Both the racks and the stored fuel continue to operate within their design basis requirements by protecting fuel from damage, maintaining SFP cooling capability, and maintaining keff of the stored array within regulatory limits. BADGER testing is consistent with the Boraflex Surveillance Program described in UFSAR 16.2.2. Therefore, the implementation of these compensatory measures does not involve a test or experiment not described in the UFSAR, where an SSC is utilized or controlled in a manner that is outside the reference bounds of the design for that SSC or is inconsistent with analyses or descriptions in the UFSAR.	☒NO ☐ YES
If question 2, 3, 4 or 5 is answered YES, **then** a 10CFR50.59 Evaluation shall be performed.	

For PSL only:
Appendix A of this form has been completed and ☐ does or ☐ does not require 10CFR72.48 applicability/screening to be performed in accordance with ENG-QI 2.9.

List the documents (UFSAR, Technical Specifications, and other documents) reviewed as applicable:
Chapters 9.5 and 16.2 - Updated FSAR Turkey Point Units 3 and 4, TS 3/4.9.14, 5.5.1, PTN-ENG-SEFJ-01-012, PTN-ENG-SEFJ-03-008, PTN-BFJF-01-001 and PTN-BFJF-07-070

Prepared by: J. Polavarapu _____ 3/1/10
(Print Name) (Sign) Date

Verified by: Modesto Jimenez _____ 3/1/10
(Print Name) (Sign) Date

Upon completion, this page shall be inserted into and remain with its associated documentation package review and approval process.