



APR 22 2011
L-2011-153
10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Response to NRC Request for Additional Information Regarding
Extended Power Uprate License Amendment Request No. 205 and
Instrumentation and Controls Issues

References:

- (1) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request No. 205: Extended Power Uprate (EPU)," (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.
- (2) Email from J. Paige (NRC) to T. Abbatiello (FPL), "Turkey Point EPU – Instrumentation and Controls (EICB) Request for Additional Information - Round 3", Accession No. ML111020376, April 12, 2011.
- (3) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-081), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Electrical Engineering Branch Issues," Accession No. ML110940179, March 31, 2011.

By letter L-2010-113 dated October 21, 2010 [Reference 1], Florida Power and Light Company (FPL) requested to amend Renewed Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Units 3 and 4 Technical Specifications (TS). The proposed amendment will increase each unit's licensed core power level from 2300 megawatts thermal (MWt) to 2644 MWt and revise the Renewed Facility Operating Licenses and TS to support operation at this increased core thermal power level. This represents an approximate increase of 15% and is therefore considered an extended power uprate (EPU).

By email from the U.S. Nuclear Regulatory Commission (NRC) Project Manager (PM) dated April 12, 2011 [Reference 2], additional information regarding instrumentation and controls issues was requested by the NRC staff in the Instrumentation and Controls Branch (EICB) to support the review of the EPU License Amendment Request (LAR) [Reference 1]. The Request for Additional Information (RAI) consisted of one (1) question regarding referencing of a figure illustrating OTAT and OPAT protection. The RAI question and FPL response are documented in the Attachment to this letter. In addition, a correction to the FPL response to an NRC Electrical Engineering Branch (EEEB) RAI question (EEEB-1.12) in letter L-2011-081 [Reference 3] is included to address a clerical error discovered in the emergency diesel generator load table.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee of Florida.

This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2010-113 [Reference 1].

This submittal contains no new commitments and no revisions to existing commitments.

ADD
NRR

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 22, 2011.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael Kiley", with a stylized flourish at the end.

Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachment

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

Turkey Point Units 3 and 4

RESPONSE TO NRC RAI REGARDING EPU LAR NO. 205
AND EICB INSTRUMENTATION AND CONTROLS ISSUES

ATTACHMENT

Response to Request for Additional Information

The following information is provided by Florida Power and Light Company (FPL) in response to the U. S. Nuclear Regulatory Commission’s (NRC) Request for Additional Information (RAI). This information was requested to support License Amendment Request (LAR) 205, Extended Power Uprate (EPU), for Turkey Point Nuclear Plant (PTN) Units 3 and 4 that was submitted to the NRC by FPL via letter (L-2010-113) dated October 21, 2010 [Reference 1].

By email from the NRC Project Manager (PM) dated April 12, 2011 [Reference 2], additional information regarding instrumentation and controls issues was requested by the NRC staff in the Instrumentation and Controls Branch (EICB) to support the review of the EPU LAR [Reference 1]. The RAI consisted of one question regarding a referenced UFSAR figure in WCAP-17070-P that depicts OTΔT and OPΔT protection. The RAI question and FPL response are documented below.

EICB-3.1 Table 3-11 of WCAP-17070-P, Rev. 0 (page 43 & page 44) indicates that the Safety Analysis Limits of “Overtemperature ΔT” and “Overpower ΔT” are Function (11), which refers to Note 11, “As noted in Figure 7.2-1 of the UFSAR”. Will Note 11 be revised so that Figure 7.2-1 of the UFSAR will be replaced with Figure 2.8.5.0-2 “Illustration of OTΔT and OPΔT Protection” on the page 2.8.5.0-39 of Attachment 4 of Licensee Amendment Request?

WCAP Table 3-11 references UFSAR Figure 7.2-1 in Note 11. As stated in UFSAR Section 7.2.2, Figure 7.2-1 illustrates only typical core limits and shows the maximum trip setpoints which are used for the protection system. WCAP Table 3-11 does not present the actual OTΔT and OPΔT values. Licensing Report (LR) Table 2.8.5.0-4 and Figure 2.8.5.0-2 do provide the actual OTΔT and OPΔT values based on the results of the current EPU calculation. However, Note 11 in Table 3-11 of WCAP-17070-P is not intended to provide the specific values for OTΔT and OPΔT protection but rather to simply point to a typical OTΔT and OPΔT protection versus T_{avg} diagram in order to illustrate the relationship between OTΔT and OPΔT protection and T_{avg} . Therefore, there is no change required to WCAP Table 3-11 Note 11.

Correction

During a review of FPL letter L-2011-081 [Reference 3], a minor error was found in the FPL response to NRC RAI question EEEB-1.12. Specifically, the maximum EPU overfrequency automatic load for the most limiting emergency diesel generator (3A) was shown as 1741.08 kw rather than 1742.09 kw and the error was carried forward in the summation. See table below.

UNIT 3 MAXIMUM LOAD AT EPU EDG 3A		
Description	Load @ 60 Hz (kW)	Load @ 60.6 Hz (kW)
	Unit 3 LOOP with Unit 3 LOCA, 0-85.5 sec	Unit 3 LOOP with Unit 3 LOCA, 0-85.5 sec
Automatic Loads	1694.95	1742.09
Manual Loads	258.82	266.63
Automatic and Manual Loads	1953.77	2008.72

References

1. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2010-113), "License Amendment Request No. 205: Extended Power Uprate (EPU)," (TAC Nos. ME4907 and ME4908), Accession No. ML103560169, October 21, 2010.
2. Email from J. Paige (NRC) to T. Abbatiello (FPL), "Turkey Point EPU – Instrumentation and Controls (EICB) Request for Additional Information - Round 3", Accession No. ML111020376, April 12, 2011.
3. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-081), "Response to NRC Request for Additional Information (RAI) Regarding Extended Power Uprate (EPU) License Amendment Request (LAR) No. 205 and Electrical Engineering Branch Issues," Accession No. ML110940179, March 31, 2011.