



MAR 16 2012

L-2012-115  
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  
Review Comments on Safety Evaluation Report and Technical Specifications for  
Amendments 247 and 243, "Relocation of Cycle Specific Parameters to the Core  
Operating Limits Report (COLR)"

References:

- (1) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2011-006), "Relocation of Cycle Specific Parameters to the Core Operating Limits Report (COLR)," (TAC Nos. ME5721 and ME5722), Accession No. ML110550160, February 21, 2011.
- (2) J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – Issuance of Amendments Regarding Relocation of Cycle Specific Parameters to the Core Operating limits Report (TAC Nos. ME5721 and ME5722)," Accession No. ML12003A133, February 24, 2012.

By letter L-2011-006 dated February 21, 2011 [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 sought to relocate selected figures and values from the Technical Specifications (TS) to the Core Operating Limits Report (COLR).

On February 24, 2012, the NRC issued Amendments 247 and 243 for Turkey Point Units 3 and 4 [Reference 2] approving the relocation of selected cycle specific parameters to the COLR.

During review of the Amendments [Reference 2], several minor errors were identified in the issued TS pages and the associated Safety Evaluation Report (SER) including a page number error in the replacement instructions (no existing 6-21a), missing revision bars for index pages iii, iv, and xvi, misordered wording in the first sentence of TS 2.1.1 on page 2-1, omission of "cycle" in "End of cycle life" under TS 3.1.1.3 Applicability on page 3/4 1-5, and  $T_{avg}$  twice cited as 2000°F rather than 200°F in the title of TS 3/4.1.1.2 on page 3 of the SER.

Clean TS pages (iii, iv, xvi, 2-1, & 3/4 1-5), consistent with the original TS markups for LAR 209 are provided in the Attachment to this letter.

This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2011-006 [Reference 1].

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

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

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

A001  
NRK

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

Executed on March 16, 2012.

Very truly yours,



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

Review Comments on Safety Evaluation Report and Technical Specifications  
- Amendments 247 and 243 -  
“Relocation of Cycle Specific Parameters to the Core Operating Limits Report (COLR)”

**ATTACHMENT**

This coversheet plus 5 pages

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SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

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## 2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

### 2.1 SAFETY LIMITS

#### REACTOR CORE

2.1.1 The combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature ( $T_{avg}$ ) shall not exceed the limits specified in the COLR, for 3 loop operation; and the following Safety Limits shall not be exceeded:

- a. The departure from nucleate boiling ratio (DNBR) shall be maintained  $\geq 1.17$  for the WRB-1 DNB correlation.
- b. The peak fuel centerline temperature shall be maintained  $< 5080^{\circ}\text{F}$ , decreasing by  $58^{\circ}\text{F}$  per 10,000 MWD/MTU of burnup.

APPLICABILITY: MODES 1 and 2.

#### ACTION:

Whenever the point defined by the combination of the highest operating loop average temperature and THERMAL POWER has exceeded the appropriate pressurizer pressure line, be in HOT STANDBY within 1 hour.

#### REACTOR COOLANT SYSTEM PRESSURE

2.1.2 The Reactor Coolant System pressure shall not exceed 2735 psig.

APPLICABILITY: MODES 1, 2, 3, 4, and 5.

#### ACTION:

MODES 1 and 2:

Whenever the Reactor Coolant System pressure has exceeded 2735 psig, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within 1 hour.

MODES 3, 4 and 5:

Whenever the Reactor Coolant System pressure has exceeded 2735 psig, reduce the Reactor Coolant System pressure to within its limit within 5 minutes.

## REACTIVITY CONTROL SYSTEMS

### MODERATOR TEMPERATURE COEFFICIENT

#### LIMITING CONDITION FOR OPERATION

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3.1.1.3 The moderator temperature coefficient (MTC) shall be within the limits specified in the COLR. The maximum upper limit shall be less positive than or equal to  $+5.0 \times 10^{-5} \Delta k/k/^\circ F$  for all the rods withdrawn, beginning of cycle life (BOL), for power levels up to 70% RATED THERMAL POWER with a linear ramp to 0  $\Delta k/k/^\circ F$  at 100 % RATED THERMAL POWER.

APPLICABILITY: Beginning of cycle life (BOL) - MODES 1 and 2\* only\*\*.  
End of cycle life (EOL) - MODES 1, 2, and 3 only\*\*.

#### ACTION:

- a. With the MTC more positive than the BOL limit specified in the COLR, operation in MODES 1 and 2 may proceed provided:
  1. Control rod withdrawal limits are established and maintained sufficient to restore the MTC to less positive or equal to the BOL limit specified in the COLR within 24 hours or be in HOT STANDBY within the next 6 hours. These withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6;
  2. The control rods are maintained within the withdrawal limits established above until a subsequent calculation verifies that the MTC has been restored to within its limit for the all rods withdrawn condition; and
  3. A Special Report is prepared and submitted to the Commission, pursuant to Specification 6.9.2, within 10 days, describing the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.

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\* With  $K_{\text{eff}}$  greater than or equal to 1.

\*\* See Special Test Exceptions Specification 3.10.3.