

L-2013-219 10 CFR 50.90

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

Turkey Point Unit 3
Docket No. 50-250
License Amendment Request No. 225 Regarding One-Time Extension for Unit 3 Technical Specification Surveillance Requirement 4.5.1.1.d

Reference: Michael Kiley (FPL) to US Nuclear Regulatory Commission Document Control

Desk (L-2013-024), "Turkey Point Unit 3 - License Amendment Request No. 225 Regarding One-Time Extension for Unit 3 Technical Specification Surveillance Requirement 4.5.1.1.d," ADAMS Accession No. ML13071A469, March 8, 2013.

On March 8, 2013, Florida Power & Light submitted the above referenced license amendment request to add a license condition for a one-time (temporary) extension for TS Surveillance Requirement 4.5.1.1.d involving an operability demonstration of the Emergency Core Cooling System (ECCS) accumulator check valves in order to account for the effects of rescheduling the Unit 3 refueling outage. The proposed extension to the Unit 3 refueling outage date was from January 2014 to March 2014.

In a discussion with the NRC staff on July 1, 2013, the NRC requested that the proposed change be made to the text of the individual Technical Specification, as opposed to the license condition. In response to this request, the enclosed submittal is provided. The wording in the proposed technical specification is identical to the wording in the originally proposed license condition.

A description of the proposed change is provided in the enclosure. The proposed change does not change or alter the outcome of the original no significant hazard evaluation or the environmental consideration evaluation.

The Turkey Point Plant Nuclear Safety Committee has reviewed the proposed license amendment change.

This letter 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.



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

Executed on July /2, 2013.

Very truly yours,

Michael Kiley Site Vice President

Turkey Point Nuclear Plant

Enclosure

cc: USNRC Regional Administrator, Region II

USNRC Project Manager, Turkey Point Nuclear Plant

USNRC Senior Resident Inspector, Turkey Point Nuclear Plant

Ms. Cindy Becker, Florida Department of Health

Enclosure Turkey Point Unit 3

License Amendment Request No. 225 Regarding One-Time Extension for Unit 3 Technical Specification Surveillance Requirement 4.5.1.1.d

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1.0 Purpose and Scope

Florida Power & Light Company (FPL) proposes to amend Renewed Facility Operating License DPR-31 for Turkey Point Unit 3 to allow for a one-time extension of Technical Specification (TS) Surveillance Requirement 4.5.1.1.d that is normally performed on an eighteen month interval during scheduled refueling outages. The requested surveillance extension will allow two months more than the currently specified refueling outage interval of eighteen months plus four and one half months grace period and facilitate the plant's ability to optimize fuel burnup during the current Unit 3 Cycle 26 operating cycle. The extension is needed as a result of a longer than expected Extended Power Uprate (EPU) refueling outage and associated power ascension test program activities as well as two subsequent forced unit outages.

2.0 Description of Proposed Change

The proposed change involves a one-time only change to the TS 4.5.1.1.d, Surveillance Requirement for ECCS. In order to provide a more specific description of the proposed change, a markup of the TS page is attached and a description of the change with appropriate justification is summarized in this document. A more detailed discussion is provided in Reference 1.

Proposed Technical Specification Change

Footnote added to TS Page 3/4 5-2

TS Surveillance 4.5.1.1 states "Each accumulator shall be demonstrated OPERABLE:

d. At least once per 18* months, each accumulator check valve shall be checked for operability.

Added Footnote:

* During Unit 3 Cycle 26 only, in lieu of the Technical Specification specified 18 month refueling frequency and 4.5 month grace period allowance, the maximum allowed surveillance test interval will be extended to no more than 24.5 months.

Basis for the Change:

The basis of the change remains the same as documented in Reference 1. The only difference between this document and the original License Amendment Request (LAR) is the original LAR addressed the creation of a new license condition, as opposed to this LAR supplement that adds the proposed change to the applicable TS pages. This one-time extension addresses a single TS surveillance requirement associated with demonstrating the operability of the ECCS accumulator check valves. The approval of this LAR avoids an early shutdown based on the previous operating cycle which did not fully account for the longer then anticipated refueling outage due to EPU.

The no significant hazard evaluation, environmental assessment evaluation and conclusions remain the same as those stated in the original referenced document.

4.0 Reference

 Michael Kiley (FPL) to US Nuclear Regulatory Commission Document Control Desk (L-2013-024), "Turkey Point Unit 3 - License Amendment Request No. 225 Regarding One-Time Extension for Unit 3 Technical Specification Surveillance Requirement 4.5.1.1.d," ADAMS Accession No. ML13071A469, March 8, 2013.

Attachment

Proposed Technical Specification Pages

3/4 5-1 3/4 5-2

This coversheet plus two pages.



3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

LIMITING CONDITION FOR OPERATION

3.5.1 Each Reactor Coolant System (RCS) accumulator shall be OPERABLE.

APPLICABILITY:

MODES 1, 2, and 3*.

ACTION:

- a. With one accumulator inoperable, except as a result of boron concentration not being within limits, restore the inoperable accumulator to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.
- b. With one accumulator inoperable due to the boron concentration not being within the limits, restore boron concentration back to the required limits within 72 hours, or be in at least HOT STANDBY within 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

- a. At least once per 12 hours by:
 - Verifying the borated water volume in each accumulator is between 6520 and 6820 gallons, and
 - Verifying that the nitrogen cover pressure in each accumulator is between 600 and 675 psig, and
 - Verifying that each accumulator isolation valve is open by control room indication (power may be restored to the valve operator to perform this surveillance if redundant indicator is inoperable).

^{*}Pressurizer pressure above 1000 psig.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- At least once per 31 days and within 6 hours after each solution volume increase of greater than
 or equal to 1% of tank volume by verifying the boron concentration of the solution in the waterfilled accumulator is between 2300 and 2600 ppm;
- c. At least once per 31 days, when the RCS pressure is above 1000 psig, by verifying that the power to the isolation valve operator is disconnected by a locked open breaker.
- d. At least once per 18 months, each accumulator check valve shall be checked for operability.

* During Unit 3 Cycle 26 only, in lieu of the Technical Specification specified 18 month refueling frequency and 4.5 month grace period allowance, the maximum allowed surveillance test interval will be extended to no more than 24.5 months.