## NRR-PMDAPEm Resource

**From:** Klett, Audrey
**Sent:** Thursday, November 07, 2013 2:55 PM
**To:** Tomonto, Bob (Bob.Tomonto@fpl.com); Czaya, Paul (Paul.Czaya@fpl.com); 'Hanek, Olga' (Olga.Hanek@fpl.com)
**Subject:** Request for Additional Information (RAI) for Turkey Point LAR 212 (TACs MF0084 and MF0085)

Bob, Olga, Paul,

Background

By letter dated October 30, 2012 (Agencywide documents Access and Management System Accession No. ML12307A017), Florida Power & Light Company (FPL, the licensee) requested an amendment to Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Unit Nos. 3 and 4, respectively. The licensee proposed changes to its emergency core cooling and electrical power systems' Technical Specifications (TSs). The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the information provided by the licensee and determined that the following additional information is need to complete the review. The NRC is requesting a response to the request by December 23, 2013. If FPL cannot meet this date, please contact the Project Manager.

Request for Additional Information (RAI)

RAI-1

The licensee proposed to remove the TSs requirements, including current ACTION 'f,' related to electrical power from TS 3/4.5.2. The license amendment request (LAR) indicates that the proposed deletion of current ACTION 'f' would be acceptable because the actions would be the same as those required in TS 3/4.8.1.1, in that the operators would restore the inoperable emergency diesel generator (DG) to operable status within the allowed 14 days or commence shutdown of the affected unit. The LAR characterized these changes as "non-intent changes." The NRC is requesting the following information to assess the request.

a. Define the licensee's use of the term "non-intent." Clarify whether the proposed changes would introduce any relaxation of current TS requirements. Clarify whether the proposed TS changes would introduce any changes in required actions and allowed outage times in the current TS requirements, and whether those changes would be less or more restrictive than the current TS. The response should include case studies for the following various combinations of inoperable DGs and the units' MODES that illustrate how the current TSs 3/4.5.2 and 3/4.8.1.1 would be implemented when compared to the proposed TSs 3/4.5.2 and 3/4.8.1.1 changes. Clarify the various combinations of SI pumps and DGs that TSs 3/4.5.2 and 3/4.8.1.1 require to be operable.

   i. U3 = Modes 1, 2, or 3; U4 = Mode 4
   ii. U3 = Modes 1, 2, or 3; U4 = Mode 5 or 6
   iii. U3 = Mode 4; U4 = Mode 4
   iv. U3 = Mode 4; U4 = Mode 5 or 6

b. For the current TS and proposed changes, specify how many and which sources of electrical power (in terms of offsite and onsite power) are required for the high head safety injection (SI) pumps to be considered operable. In this description, clarify whether in the TS definition 1.17 of OPERABLE-OPERABILITY, the term "electrical power" means offsite and onsite power, or whether it means offsite or onsite power. Provide supporting licensing and design basis information.

c. Clarify if the current ACTION 'f' of TS 3/4.5.2 would require both units to transition MODES simultaneously if an SI pump was not capable of being powered from its associated OPERABLE DG

and that capability was not restored within 14 days. Provide supporting licensing and design basis information.

d. Clarify whether "capable of being powered from" in current Limiting Condition for Operability (LCO) 3.5.2.a includes the circuitry between the SI pump motor and the DG. Provide supporting licensing and design basis information.

e. In ACTION 'd.2' of TS 3/4.8.1.1, for any given DG that is not OPERABLE, clarify which two SI pumps would have to be verified OPERABLE and capable of being powered from their associated OPERABLE DGs. Provide supporting licensing and design basis information.

RAI-2

The licensee proposed a new ACTION 'f' for when LCO 3.5.2.d is not met (i.e., when there is not an OPERABLE flow path capable of taking suction from the refueling water storage tank as defined in Specification 3.5.2). The LAR states that an allowed outage time consistent with LCO 3.0.3 is appropriate and consistent with the Standard Technical Specifications (STS) Bases discussion. The staff notes that in the proposed ACTION 'f,' the transition time from MODE 3 to MODE 4 is not specified in the LAR and can therefore potentially be different from LCO 3.0.3. The proposed ACTION statement could also result in plant operators having to follow both the proposed ACTION 'f' of TS 3/4.5.2 and the current ACTION 'a' of TS 3/4.5.3 if the plant transitions to MODE 4, which could result in two different Specifications for when to enter MODE 5. Therefore, the staff requests the following information.

a. Provide a safety basis for why the proposed ACTION 'f' is acceptable and addresses the non-conservative TS with respect to the potential amount of time in Mode 3, which could be longer than the time specified in ACTIONS CONDITION C of STS 3.5.2 and the STS 3.5.2 bases.

b. Describe how the TS 3/4.5.3 requirements would be evaluated and applied in a situation where the proposed TS 3/4.5.2 ACTION 'f' requirements are being followed and the unit transitions to MODE 4.

Thanks,

Audrey Klett
Project Manager
NRR/DORL/LPL2-2
301-415-0489

**Hearing Identifier:** NRR_PMDA
**Email Number:** 1009

**Mail Envelope Properties** (Audrey.Klett@nrc.gov20131107145500)

**Subject:** Request for Additional Information (RAI) for Turkey Point LAR 212 (TACs MF0084 and MF0085)
**Sent Date:** 11/7/2013 2:55:17 PM
**Received Date:** 11/7/2013 2:55:00 PM
**From:** Klett, Audrey

**Created By:** Audrey.Klett@nrc.gov

**Recipients:**
"Tomonto, Bob (Bob.Tomonto@fpl.com)" <Bob.Tomonto@fpl.com>
Tracking Status: None
"Czaya, Paul (Paul.Czaya@fpl.com)" <Paul.Czaya@fpl.com>
Tracking Status: None
"'Hanek, Olga' (Olga.Hanek@fpl.com)" <Olga.Hanek@fpl.com>
Tracking Status: None

**Post Office:**

| **Files** | **Size** | **Date & Time** |
|---|---|---|
| MESSAGE | 5161 | 11/7/2013 2:55:00 PM |

**Options**
**Priority:** Standard
**Return Notification:** No
**Reply Requested:** No
**Sensitivity:** Normal
**Expiration Date:**
**Recipients Received:**