



L-2015-181
10 CFR 50.90
July 7, 2015

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

Re: Turkey Point Nuclear Plant, Units 3 and 4
Docket Nos. 50-250 and 50-251

Changes to License Amendment Request 229, Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

References:

1. Florida Power & Light Company letter L-2014-033, "License Amendment Request No. 229, Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," April 9, 2014 [ML14105A042]
2. NRC letter "Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Request for Additional Information on License Amendment Request to Revise Technical Specifications to Implement TSTF-425, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specifications (RITSTF) Initiative 5B' (TAC Nos. MF3931 and MF3932)," August 7, 2014 [ML14212A713]
3. Florida Power & Light Company letter L-2014-266 "Response to NRC Technical Specifications Branch Request for Additional Information Regarding License Amendment Request No. LAR-229, Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," August 29, 2014 [ML14252A228]
4. Florida Power & Light Company letter L-2015-022, "Supplement to License Amendment Request 229, Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," April 3, 2015 [ML15113A311]

In Reference 1 and supplemented by References 3 and 4, Florida Power & Light Company (FPL) submitted a request for an amendment to the Technical Specifications (TS) for Turkey Point Units 3 and 4. The proposed amendment would modify the TS by relocating specific surveillance frequencies to a licensee-controlled program with implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies." The changes are consistent with U.S. Nuclear

A001
LRR

Regulatory Commission (NRC)-approved TS Task Force Standard TS change TSTF-425, "Relocate Surveillance Frequencies to Licensee Control- RITSTF [Risk-Informed TS Task Force] Initiative 5b," Revision 3.

Subsequent to submission of the referenced documents, FPL identified that several of the proposed changes to the TS require modifications or corrections. This supplement to the license amendment request (LAR) modifies and corrects several of the proposed changes. The attachment provides revised markups of the affected TS pages showing the proposed changes to the Turkey Point TS. The TS markups in this supplement supersede the corresponding markups previously submitted in References 1, 3, and 4.

- Modifications to Surveillance Requirements (SRs) for Control Rod Position Indication

In Reference 4, FPL proposed deleting TS Table 4.1-1, Rod Position Indicator Surveillance Requirements, and revising SR 4.1.3.2.2 for the analog rod position indication system and SR 4.1.3.3.2 for the group step counter demand position indicator. The changes proposed in Reference 4 are deleted and replaced with those originally provided in Reference 1 where Table 4.1-1 is retained in the TS. The attachment contains a markup of the TS showing the proposed changes.

- Modifications to SR 4.8.1.1.2i for the Diesel Generator Fuel Oil System

In Reference 3, FPL revised its proposed changes so that items 1 and 2 under SR 4.8.1.1.2i have different frequencies. However, the numbering format was not adjusted to be consistent with the proposed change. To resolve this discrepancy, the attachment contains a markup of the TS showing the SRs renumbered from 4.8.1.1.2i.1 and 4.8.1.1.2i.2 to 4.8.1.1.2i and 4.8.1.1.2j, respectively.

- TS Index

The proposed changes resulted in changes to the page numbers in section 6 of the TS. As a result, the attachment contains a revised TS index that incorporates the changes to the page numbers.

- Typographical Corrections

Reference 4 discussed that it corrected two misspellings in SR 4.8.1.1.2.f. The corrections were made to SR 4.8.1.1.2.a.

The changes provided in this supplement are editorial in nature and do not alter the conclusion in the LAR that the proposed changes do not involve a significant hazards consideration.

This supplement to the LAR contains no new regulatory commitments and does not modify any existing commitments.

These changes have been reviewed by the Turkey Point Plant Nuclear Safety Committee.

Pursuant to 10 CFR 50.91(b)(1), a copy of this submittal is being forwarded to the designated State of Florida official.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Licensing Manager, at 305-246-6698.

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

Executed on July 7, 2015.

Sincerely,

A handwritten signature in dark ink, appearing to read 'T. Summers', with a long horizontal line extending to the right.

Thomas Summers

Site Vice President
Turkey Point Nuclear Plant

Attachment: Technical Specification Mark-ups

cc: NRC Regional Administrator, Region II
NRC Senior Resident Inspector
NRC Project Manager
Ms. Cindy Becker, Florida Department of Health

ATTACHMENT

**Turkey Point
Mark-ups of Technical Specification Pages**

(six pages follow)

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REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS

4.1.3.2.1 Each analog rod position indicator shall be determined to be OPERABLE by verifying that the Demand Position Indication System and the Analog Rod Position Indication System agree within the Allowed Rod Misalignment of Specification 3.1.3.1 (allowing for one hour thermal soak after rod motion) ~~at least once per 12 hours~~ except during time intervals when the Rod Position Deviation Monitor is inoperable, then compare the Demand Position Indication System and the Analog Rod Position Indication System at least once per 4 hours. *

4.1.3.2.2 Each of the above required analog rod position indicator(s) shall be determined to be OPERABLE by performance of a CHANNEL CHECK, CHANNEL CALIBRATION and ANALOG CHANNEL OPERATIONAL TEST performed in accordance with Table 4.1-1. *

Insert 1

Replace each marked through
Surveillance Frequency with "SFCP".

TABLE 4.1-1

ROD POSITION INDICATOR SURVEILLANCE REQUIREMENTS

<u>Functional Unit</u>	<u>Check</u>	<u>Calibration</u>	<u>Operational Test</u>
Individual Rod Position	S	R	M
Demand Position	S	N/A	R

REACTIVITY CONTROL SYSTEMS

POSITION INDICATION SYSTEM - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.3.3 The group step counter demand position indicator shall be OPERABLE and capable of determining within ± 2 steps the demand position for each shutdown and control rod not fully inserted.

APPLICABILITY: MODES 3* **, 4* **, and 5* **

ACTION:

With less than the above required group step counter demand position indicator(s) OPERABLE, open the reactor trip system breakers.

SURVEILLANCE REQUIREMENTS

4.1.3.3.1 Each of the above required group step counter demand position indicator(s) shall be determined to be OPERABLE by movement of the associated control rod at least 10 steps in any one direction at least once per ~~31~~ days.

Insert 1

4.1.3.3.2 OPERABILITY of the group step counter demand position indicator shall be verified in accordance with Table 4.1-1.

* With the Reactor Trip System breakers in the closed position.

** See Special Test Exceptions Specification 3.10.5.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- Insert 1**
- h. ~~At least once per 10 years~~ or after any modifications which could affect diesel generator interdependence by starting all required diesel generators simultaneously and verifying that all required diesel generators provide 60 ± 0.6 Hz frequency and 3950-4350 volts in less than or equal to 15 seconds: and
- i. ~~At least once per 10 years by:~~
- In accordance with the Surveillance Frequency Control Program by draining**
- i. 1) ~~Draining~~ each fuel oil storage tank, removing the accumulated sediment and cleaning the tank.* **At least once per 10 years for Unit 4 only by**
- j. 2) ~~For Unit 4 only,~~ performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda.

4.8.1.1.3 Reports - (Not Used)

* A temporary Class III fuel storage system containing a minimum volume of 38,000 gallons of fuel oil may be used for up to 10 days during the performance of Surveillance Requirement 4.8.1.1.2i.1 for the Unit 3 storage tank while Unit 3 is in Modes 5, 6, or defueled. If the diesel fuel oil storage tank is not returned to service within 10 days, Technical Specification 3.8.1.1 Action b and 3.8.1.2 Action apply to Unit 4 and Unit 3 respectively.