

NRR-PMDAPEm Resource

From: Klett, Audrey
Sent: Friday, March 04, 2016 10:54 AM
To: Guth, Mitch
Cc: Hanek, Olga
Subject: Request for Additional Information re. Turkey Point Unit 3 and 4 LAR 240 (CACs MF6783 and MF6784)

Hi Mitch,

By application dated October 6, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15301A261), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request (LAR) No. 240 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). NRC's Reactor Systems Branch (SRXB) staff reviewed the application and identified areas where it needs additional information to support its review. The request for additional information (RAI) is provided below. As discussed with Ms. Olga Hanek of the licensee's staff on February 24, 2016, the NRC requests FPL to respond to the RAI by April 1, 2016.

SRXB-RAI-1

In Section 4.2 of the LAR, it is stated that the request varies from the precedents in that it does not add a reference to WCAP-13749-P-A in Technical Specification (TS) 6.9.1.7, "Core Operating Limits Report [COLR]," and cites that the TS example changes provided in WCAP-13749-P-A do not include a revision to the TS requirements for the COLR. However, per the Note in Appendix B of WCAP-13749-P-A, and taking into consideration Section 2.3.3 of Appendix B, it is stated that WCAP-13749-P-A must be included in the TS COLR section. Additionally, the staff reviewed other recent similar precedents and found that in all those precedents, WCAP-13749-P-A was included in the TS COLR section. Please supplement the LAR to meet the requirements in WCAP-13749-P-A for inclusion of it in the TS COLR section and to be consistent with the precedents.

SRXB-RAI-2

In Section 3.0 of the LAR, the licensee stated that the PHOENIX-P code is currently used for Turkey Point and that the cross section generation may eventually transition to the PARAGON lattice code and NEXUS methodology. In the LAR, Attachment 5, response to Farley and Vogtle RAI Question 2, it is stated that Turkey Point does not propose to add PHOENIX-P, PARAGON, or NEXUS to the listed COLR references in the TSs and cites Vogtle as a precedent. However, the NRC staff has reviewed the Vogtle COLR references in its TSs and has found that Vogtle included PARAGON and NEXUS in the TS COLR references. Additionally, the staff reviewed other recent similar precedents and found that the neutronics methods are included in the TS COLR section. Therefore, the staff requests that the neutronics methods used to confirm moderator temperature coefficient (MTC) reload parameters be included in the TS COLR section to be consistent with the previous precedents and that future COLRs identify the neutronics methods used with WCAP-13749-P-A for the current cycle.

SRXB-RAI-3

In the LAR, Attachment 3, "Changes to COLR," the units used in the Revised Predicted MTC equation are inconsistent with those in the COLR, Section 2.6 (PCM/degree F vs. $\Delta k/k/^\circ\text{F}$, respectively). In order for the comparison of the Revised Predicted MTC to the Surveillance Requirement (SR) 4.1.1.3.b surveillance limit to be valid, the staff requests the licensee to modify this inconsistency in the MTC units.

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