

## **NRR-PMDAPEm Resource**

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**From:** Klett, Audrey  
**Sent:** Monday, April 18, 2016 4:17 PM  
**To:** Guth, Mitch  
**Cc:** Kilby, Gary; Cross, William; Hanek, Olga  
**Subject:** Request for Additional Information - Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456)

Hi Mitch,

By application dated December 23, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15029A297), Florida Power & Light Company (FPL, the licensee) submitted License Amendment Request (LAR) No. 236 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed amendments would revise the Technical Specifications (TSs) to Implement TS Task Force (TSTF)-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk-Informed TSTF] Initiative 4b."

The U.S. Nuclear Regulatory Commission's (NRC's) Balance of Plant Branch (SBPB) staff reviewed the application and identified areas where it needs additional information to support its review. The staff's request for additional information (RAI) is provided below. As discussed with Ms. Olga Hanek of the licensee's staff on April 18, 2016, the NRC is requesting the licensee to respond to the RAI within 60 calendar days of April 14, 2016.

### **SBPB RAI-1**

In the event of one inoperable main steam isolation valve (MSIV), the current TS 3.7.1.5 requires entry into "Hot Standby" after 24 hours. Turkey Point LAR proposed to revise the TS to require entry into MODE 2, after 24 hours. As a basis for this change, the LAR indicates TSTF-505 contains incorrect structure, and in order to establish the correct structure for Turkey Point TS 3.7.1.5, FPL proposes that the required actions (RAs) for one or more inoperable MSIVs in Mode 1 require entering Mode 2, rather than Modes 3 and 4, if the MSIVs are not restored to operable status within the completion time (CT). While these changes are consistent with the STSs, this is a deviation from the current TS and allows an additional 6 hours in MODE 2. The staff is unable to locate a clear justification for this mode change. Please provide a technical justification for the proposed change from Hot Standby to MODE 2.

In addition, the LAR indicates this change aligns the Turkey Point TSs with TSTF-505 and is appropriate because it provides a subsequent RA if entry into Mode 2 is required because two or more inoperable MSIVs in Mode 1 are not restored to operable status within the CT. For complete alignment with TSTF-505, the staff finds the following actions missing from proposed TS change: (1) TSTF-505 includes a [8] hours completion time for closing MSIV for one or more MSIVs inoperable in MODE 2 or 3, but the proposed change to TS 3.7.1.5 does not specify a time limit for closing an inoperable MSIV in Modes 2 or 3; and (2) TSTF-505 includes a condition to verify MSIV is closed once per 7 days, but the proposed TS is missing any action for MSIV closure verification. Please provide an explanation why the LAR did not request adoption of the completion time and periodic MSIV closure verification.

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