FPL

10 CFR 50.90
L-2017-060
April 9, 2017

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

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

License Amendment Request 249: Elimination of Certain Technical Specification Reporting Requirements, Revised Action for Emergency Core Cooling System, and Changes to Administrative Technical Specifications

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) hereby requests a license amendment to revise the Technical Specifications (TS) for Turkey Point Units 3 and 4. The proposed change deletes certain reporting requirements from the TS, revises the Action requirements in TS 3.5.2, Emergency Core Cooling Systems, revises the administrative TS regarding plant staff and responsibilities, and corrects a misspelling in TS 3.3.3.2, Movable Incore Detectors.

The Enclosure to this letter provides FPL's evaluation of the proposed changes. Attachment 1 to the enclosure provides markups of the TS showing the proposed changes, and Attachment 2 contains markups showing proposed changes to the TS Bases. The proposed changes to the TS Bases are provided for information only and will be implemented in accordance with the TS Bases Control Program upon implementation of the amendment. Retyped TS pages containing the proposed changes will be provided when requested by the NRC Project Manager.

As discussed in the evaluation, the proposed changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change.

The Turkey Point Onsite Review Group has reviewed the proposed license amendment. In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designee of the State of Florida.

There are no new or revised commitments made in this submittal.

FPL requests NRC review and approval of this license amendment request by March 31, 2018 and implementation within 90 days after issuance.

If you have any questions or require additional information, 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 April _7_, 2017

Sincerely,

Thomas Summers
Regional Vice President - Southern Region
Florida Power & Light Company

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

Evaluation of the Proposed Change

SUBJECT: License Amendment Request 249: Elimination of Certain Technical Specification Reporting Requirements, Revised Action for Emergency Core Cooling System, and Changes to Administrative Technical Specifications

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Attachment 1 - Markup of the Technical Specifications

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Evaluation of the Proposed Change

1.0 SUMMARY DESCRIPTION

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Florida Power & Light Company (FPL) requests a license amendment to revise the Technical Specifications (TS) for Turkey Point Units 3 and 4. The proposed change deletes certain reporting requirements from the TS. The change deletes numerous special reports associated with various TS actions, surveillance requirements, and the design feature for fuel assemblies. The Startup Report and the Annual Report in the Administrative Controls section of the TS are also eliminated. The proposed amendment removes the completion time for restoring spent fuel pool water level, revises the Action requirements in TS 3.5.2, Emergency Core Cooling Systems, revises the administrative TS regarding plant staff and responsibilities, and corrects a misspelling in TS 3.3.3.2, Movable Incore Detectors.

2.0 DETAILED DESCRIPTION

<u>Background</u>

In October of 1973, the NRC published Regulatory Guide (RG) 1.16, Revision 1, "Reporting of Operating Information" to provide an acceptable basis for meeting the reporting requirements of the facility operating license. In particular, this RG provided a description of each of the periodic reports, including annual reports and the Startup Report, that licensees are required to submit to demonstrate compliance with the TS reporting requirements. Subsequently, in August 2009, via the *Federal Register* (74 FR 40244), the NRC withdrew RG 1.16 because it was no longer needed on the basis that TS reporting requirements are contained in 10 CFR 50, as well as other parts of 10 CFR Chapter 1. In addition, guidance on the content and frequency of required reports are contained in Chapter 5, "Administrative Controls," of NUREG-1431, "Standard Technical Specifications, Westinghouse Plants" [Reference 1]. The intent of the proposed changes is to be consistent with the NRC's regulatory requirements as prescribed in 10 CFR Part 50 and as indicated in the *Federal Register* Notice that withdrew RG 1.16 and the guidance provided in NUREG-1431.

In May of 1997, Generic Letter (GL) 97-02, "Revised Contents of the Monthly Operating Report," provided the results of the NRC's assessment of its information gathering needs, which identified duplicative reporting, and determined that some reports could be reduced in scope or eliminated. Although GL 97-02 was specific to the Monthly Operating Report, the proposed changes seek to eliminate, in a similar fashion, redundant reports that are no longer considered warranted.

The proposed license amendment also proposes to revise TS 3.5.2, ECCS Subsystems - Tavg Greater Than or Equal to 350°F, ACTION a, to address inoperability of the parallel flow paths in the ECCS cold leg injection headers and provide a 72-hour completion time for restoration of an inoperable flow path. This change restores actions for an inoperable parallel flow path that previously existed in the TS.

FPL is requesting additional changes to administrative TS 6.1, Responsibility; and TS 6.2, Organization. These proposed changes consolidate requirements for the control room command function and revise position titles.

Proposed Changes

TS Index

- The TS index is revised to reflect the changes in the proposed license amendment. These conforming changes to the index are administrative in nature and require no further justification.

TS 3.1.1.3, Moderator Temperature Coefficient

- Delete ACTION a.3 requiring a special report:

~~3. A Special Report is prepared and submitted to the Commission, pursuant to Specification 6.9.2, within 10 days, describing the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.~~

TS 3.2.4, Quadrant Power Tilt Ratio

- Delete Surveillance Requirement (SR) 4.2.4.3 requiring a special report:

~~4.2.4.3 If the QUADRANT POWER TILT RATIO is not within its limit within 24 hours and the POWER DISTRIBUTION LIMITS of 3.2.2 and 3.2.3 are within their limits, a Special Report in accordance with 6.9.2 shall be submitted within 30 days including an evaluation of the cause of the discrepancy.~~

TS 3.3.3.2, Movable Incore Detectors

- Correct misspelling of QUADRANT in TS Limiting Condition for Operation (LCO) 3.3.3.2.a:

At least 16 detector thimbles when used for recalibration and check of the Excore Neutron Flux Detection System and monitoring the ~~QUANDRANT~~ ***QUADRANT*** POWER TILT RATIO*****, and at least 38 detector thimbles when used for monitoring $F^N_{\Delta H}$, $F_Q(Z)$ and $F_{xy}(Z)$.

TS 3.4.9.3, Overpressure Mitigating Systems

- Delete ACTION e requiring a special report:

~~e. In the event either the PORVs or a 2.20 square inch vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence. A Special Report is not required when such a transient is the result of water injection into the RCS for test purposes with an open vent path.~~

- Re-letter ACTION f:

~~f~~ e. The provisions of Specification 3.0.4 are not applicable.

TS 3.5.2, ECCS Subsystems - T_{avg} Greater Than or Equal to 350°F

- Revise ACTION a to include parallel injection flow paths:

~~a. With one RHR heat exchanger or suction flow path from the containment sump inoperable, restore the inoperable RHR heat exchanger or suction flow path from the containment sump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

With one of the following components inoperable:

1. ***RHR heat exchanger,***
2. ***RHR suction flow path from the containment sump,***
3. ***RHR parallel injection flow path, or***
4. ***SI parallel injection flow path***

Restore the inoperable component to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

- Delete ACTION b requiring a special report:

~~b. In the event the ECCS is actuated and injects water in the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date since January 1, 1990.~~

TS 3.5.3, ECCS Subsystems - T_{avg} Less Than 350°F

- Delete ACTION c requiring a special report:

  ~~c. In the event the ECCS is actuated and injects water in the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date since January 1, 1990.~~

TS 3.6.1.6, Containment Structural Integrity

- Revise ACTION a to remove engineering evaluation and special report:

  a. With more than one tendon with an observed lift-off force between 90% and 95% of the predicted force, or with one tendon below 90% of the predicted force, restore the tendon(s) to the required level of integrity within 15 days ~~and perform an engineering evaluation of the containment and provide a Special Report to the Commission within 30 days in accordance with Specification 6.9.2~~ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- Revise ACTION b to remove engineering evaluation and special report:

  b. With the average of all measured tendon forces for each type of tendon (dome, vertical, and hoop), including those measured in ACTION a., less than the predicted force, restore the tendon(s) to the required level of integrity within 15 days ~~and perform an engineering evaluation of the containment and provide a Special Report to the Commission within 30 days in accordance with Specification 6.9.2~~ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- Revise ACTION c to remove engineering evaluation and special report:

  a. With any abnormal degradation of the structural integrity other than ACTION a. and ACTION b., at a level below the acceptance criteria of Specifications 4.6.1.6.1, 4.6.1.6.2 and 4.6.1.6.3, restore the containment to the required level of integrity within 72 hours ~~and perform an engineering evaluation of the containment and provide a Special Report to the Commission within 15 days in accordance with Specification 6.9.2~~ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours

TS 3.7.7, Sealed Source Contamination

- Delete SR 4.7.7.3 for a special report:

  ~~4.7.7.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microCurie of removable contamination.~~

TS 3.8.1.1, A.C. Sources - Operating

- Delete four-hour notification from ACTION c:

  c. With one startup transformer and one of the required diesel generators inoperable, demonstrate the OPERABILITY of the remaining A.C. sources…..~~Notify the NRC within 4 hours of declaring both a start-up transformer and diesel generator inoperable.~~ Restore the other A.C. power source………….

- Delete four-hour notification from ACTION e:

  e. With two of the above required startup transformers or their associated circuits inoperable ~~notify the NRC within 4 hours~~; restore at least one of the inoperable startup transformers to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours* and in COLD SHUTDOWN within the following 30 hours………

TS 3.9.11, Water Level - Storage Pool

- Revise ACTION a to eliminate the four-hour completion time

  a. With the requirements of the above specification not satisfied, suspend all movement of fuel assemblies and crane operations with loads in the fuel storage areas ~~and restore the water level to within its limit within 4 hours~~.

- Eliminate the footnote that permits suspending the requirements of TS 3.9.11

  ~~*The requirements of this specification may be suspended for more than 4 hours to perform maintenance provided a 10 CFR 50.59 evaluation is prepared prior to suspension of the above requirement and all movement of fuel assemblies and crane operation with loads in the fuel storage areas are suspended. If the level is not restored within 7 days, the NRC shall be notified within the next 24 hours.~~

TS 5.3.1, Fuel Assemblies

- Delete special report from TS 5.3.1:

5.3.1 The core shall contain 157 fuel assemblies with each fuel assembly containing 204 fuel rods clad with Zircaloy-4, ZIRLO®, or Optimized ZIRLO™ except that replacement of fuel rods by filler rods consisting of stainless steel, or by vacant rod positions, may be made in fuel assemblies if justified by cycle-specific reload analysis using NRC-approved methodology. The reactor core contains approximately 71 metric tons of uranium in the form of natural or slightly enriched uranium dioxide pellets. Each fuel rod shall have a nominal active fuel length of 144 inches. ~~Should more than 30 individual rods in the core, or 10 fuel rods in any fuel assembly, be replaced per refueling, a Special Report discussing the rod replacements shall be submitted to the Commission within 30 days after cycle startup.~~

TS 6.1, Responsibility; TS 6.2, Organization

- Revise the title Plant General Manager:

TS 6.1.1 The ~~Plant General Manager~~ ***plant manager*** shall be responsible for overall unit operation of both units and shall delegate in writing the succession to this responsibility during his absence.

TS 6.2.1.c The ~~Plant General Manager~~ ***plant manager*** shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

- Revise TS 6.1.2 regarding control room command function:

6.1.2 ~~The Nuclear Plant Supervisor (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Site Vice President shall be reissued to all station personnel on an annual basis.~~
The Shift Manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while either unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while both units are in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

- Revise TS 6.2.2 and Table 6.2-1 to change titles:

  6.2.2.h. The ***Assistant*** Operations ***Manager - Line*** ~~Supervisor~~ shall hold a Senior Reactor Operator License.

  Table 6.2-1 ***SM***~~NPS~~ - ***Shift Manager*** ~~Nuclear Plant Supervisor~~ with a Senior Operator License

TS 6.9, Reporting Requirements

- Delete TS 6.9.1,1, Startup Report
- Delete TS 6.9.1.2, Annual Reports

TS 6.14, Offsite Dose Calculation Manual (ODCM)

- Revise the title Plant General Manager:

  6.14.2.b. Shall become effective after approval of the ~~Plant General Manager~~ ***plant manager***; and

3.0 TECHNICAL EVALUATION

General Discussion

Turkey Point has not adopted the Improved Standard Technical Specifications (STS) for Westinghouse Plants (NUREG-1431); however, the NRC allows for selective incorporation of improved STS requirements. As discussed in the Standard Review Plan [Reference 2], TS change requests for facilities with TS based on previous STS (NUREG-0452, STS, Westinghouse Plants), should comply with comparable provisions in current STS NUREGs to the extent possible or justify deviations from the STS. The proposed changes are generally consistent with the requirements in the current STS.

TS 3.1.1.3 - Moderator Temperature Coefficient (MTC)

The current TS requires submitting a special report if the MTC exceeds its positive limit. The report provides the measured value of the MTC, the interim control rod withdrawal limits, and the core burnup necessary to restore the MTC to within limits for the all rods withdrawn condition. FPL proposes to eliminate this reporting requirement.

The proposed change is consistent with STS 3.1.3, MTC, which does not require submitting a special report, and the report is not needed to ensure operation of the facility in a safe manner. The Action in current TS 3.1.1.3 ensures continued safe operation by establishing and maintaining measures that ensure the MTC is restored to within limits. FPL is not proposing any changes to the Action other than removing the requirement to submit a special report. The special report only provides information and neither seeks any approval from the NRC nor ensures safe operation of the facility during or after the ten days provided to submit the report. Therefore, elimination of the report is appropriate on the basis that the change is consistent with NUREG-1431 and the report is not necessary to ensure operation of the facility in a safe manner.

TS 3.2.4, Quadrant Power Tilt Ratio (QPTR)

The current TS requires submitting a special report with an evaluation of the cause of the discrepancy if QPTR exceeds its limit for greater than 24 hours. FPL proposes to delete this reporting requirement.

The proposed change is consistent with STS 3.2.4, QPTR, which does not require submitting a special report. In the event that QPTR is not restored to within its limit in 24 hours, the Action in TS 3.2.4, which is unaffected by the proposed change, ensures safe operation of the facility by requiring a power reduction that places the plant outside the Applicability of TS 3.2.4. Submitting a special report discussing the cause of the discrepancy 30 days following the occurrence of QPTR exceeding its limit for 24 hours is not necessary to ensure safe operation of the facility. Moreover, SR 4.2.4.3, which requires submitting the special report, is not necessary to meet 10 CFR 50.36(c)(3).

Information provided in the report would continue to be available to the NRC. The condition in which QPTR exceeded its limit for greater than 24 hours would be entered into the corrective action program, which is subject to NRC review and audit. Information regarding the cause of the discrepancy would also be available through NRC resident inspector activities. Therefore, elimination of the report is appropriate on the basis that the change is consistent with NUREG-1431 and the report is not necessary to ensure operation of the facility in a safe manner.

TS 3.3.3.2, Movable Incore Detectors

The proposed amendment includes a change to correct the misspelling of the word QUADRANT in TS 3.3.3.2, item a. This change is editorial in nature and does not alter the technical requirements of TS 3.3.3.2.

TS 3.4.9.3, Overpressure Mitigating Systems

The TS currently requires submitting a special report in the event that either a power-operated relief valve (PORV) or a reactor coolant system (RCS) vent functions to mitigate a RCS pressure transient during operation with RCS temperature 275 degrees F or less. The report describes the circumstances initiating the transient, the effects of the PORV or RCS vent, and corrective actions to prevent recurrence. FPL proposes to delete this reporting requirement.

Prior to June 1999, licensees were required to include documentation of challenges to PORVs and safety valves in the routine monthly operating reports submitted to the NRC in accordance with the TS. However, in June 1999, the NRC approved TSTF-258, “Changes to Section 5.0, Administrative Controls” [Reference 3], which, among other changes, deleted the requirement to provide documentation of all challenges to the PORVs or pressurizer safety valves. The NRC concluded that reporting of challenges to pressurizer PORVs and safety valves may be removed from TS since the information needed by the NRC is adequately addressed by the reporting requirements in 10 CFR 50.73, "Licensee Event Reports." In addition, a low temperature over-pressure transient that violates the TS pressure - temperature limits would be immediately reportable under 10 CFR 50.72, "Immediate notification requirements for operating nuclear power reactors."

FPL proposes to delete this reporting requirement on the basis that the change is consistent with the STS and the report is a duplicative requirement. STS 3.4.12, Low Temperature Overpressure Protection (LTOP) System, does not require reporting mitigation of a pressure transient. The requirements in 10 CFR 50.72 and 10 CFR 50.73 adequately address reporting of low temperature over-pressure transients; therefore, elimination of this reporting requirement from the TS is acceptable.

TS 3.5.2 and TS 3.5.3, Emergency Core Cooling Systems (ECCS)

<u>TS 3.5.2, ACTION a</u>

In the event of an accident, the safety injection (SI) system provides adequate core cooling. The principal components of the SI system which provide emergency core cooling immediately following a loss of coolant are the accumulators, the four SI (high head) pumps, and the two residual heat removal (RHR) (low head) pumps. A SI actuation signal opens the SI system isolation valves and starts the SI and RHR pumps. The RHR pumps deliver flow to all three cold legs through the piping between the accumulators and the cold legs. The high head safety injection pumps deliver flow into three cold leg injection lines connected to the pipes from the accumulators close to the reactor coolant system cold leg piping. The RHR and SI cold leg injection headers each contain two parallel flow paths with a motor-operated isolation valve in each flow path that opens on a SI actuation signal.

TS 3.5.2 specifies the ECCS equipment required to be operable; however, the Actions do not address inoperability of one of the two parallel flow paths in the RHR or SI injection headers. With regard to the parallel SI flow paths, Actions are provided for inoperable SI pumps or associated discharge flow paths; however, the two parallel discharge flow paths are not associated with any particular SI pump. Therefore, no Action applies specifically to an inoperable parallel flow path in the SI injection header. Amendments 267 and 262 [Reference 4], issued in November 2015, revised the Actions in TS 3.5.2. Prior to these amendments, ACTION a addressed inoperable ECCS flow paths and provided 72 hours to restore an inoperable flow path to operable status before a plant shutdown would be required. Following the amendments, the Actions for inoperable ECCS pumps were revised to include inoperability of the associated discharge flow paths. This change did not account for the parallel flow paths, which are not associated with a particular SI pump.

A similar condition exists regarding an inoperable parallel flow path in the RHR injection header. Currently, ACTION g addresses an inoperable RHR pump or associated discharge flow path and provides seven days to restore the pump or flow path to operable status. However, the intent of this Action, as revised in Amendments 267 and 262, was to address only the section of the RHR discharge flow path associated with a particular RHR pump and not the parallel injection flow paths. Prior to Amendments 267 and 262, ACTION a applied to an inoperable RHR parallel flow path and provided 72 hours to restore the flow path to operable status.

FPL proposes to revise TS 3.5.2 ACTION a to address inoperability of the parallel flow paths in the RHR and SI injection headers and provide a 72-hour completion time for restoration of an inoperable flow path. This change establishes Actions for an inoperable RHR or SI parallel flow path that existed prior to Amendments 267 and 262.

FPL has implemented interim administrative controls that prescribe a 72 hour AOT for one inoperable SI or RHR parallel injection valve.

Reporting Requirements

The current TS require submitting a special report within 90 days if ECCS actuates and injects water into the RCS. FPL proposes to delete this reporting requirement.

The proposed change is consistent with the STS, where neither STS 3.5.2, ECCS - Operating, nor STS 3.5.3, ECCS - Shutdown, requires reporting an actuation of the ECCS. Moreover, the TS reporting requirement duplicates the requirement in 10 CFR 50.73(a)(2)(iv) to report an actuation of the ECCS. While the TS provides a 90-day reporting time, 10 CFR 50.73 requires a more timely report within 60 days. Furthermore, an immediate notification (four hours) would be required for an ECCS actuation that meets the criteria of 10 CFR 50.72(b)(2)(iv), an event that results or should have resulted in ECCS discharge into the RCS as a result of a valid signal.

Although 10 CFR 50.73 requires an LER in the event of an ECCS actuation, 10 CFR 50.73 does not cover all the requirements currently specified in TS 3.5.2 and TS 3.5.3. Specifically, the TS require that the special report includes "total accumulated actuation cycles to date since January 1, 1990." As discussed in Turkey Point UFSAR section 4.1.5, Table 4.1-10 provides the component cyclic or transient limits for the RCS and secondary coolant system previously relocated from TS section 5.6. Turkey Point procedure 0-ADM-553, Maintaining Records for Design Cycles, establishes the requirement for recording the actual cycles imposed on various plant systems to ensure that the design cycles are not exceeded. Corrective actions are initiated when any plant cycle comes within 80% of its TS design cycle limit.

FPL proposes to delete the reporting requirements on the basis that the change is consistent with the STS and the reporting requirements are duplicative. The requirements in 10 CFR 50.72 and 10 CFR 50.73 adequately address reporting of ECCS actuations. Further, the monitoring provided by procedure 0-ADM-553 provides reasonable assurance that ECCS actuations will be appropriately tracked, assuring that the integrity of the components will be maintained within design limits. Therefore, FPL concludes that deletion of TS 3.5.2, ACTION b, and TS 3.5.3, ACTION c is acceptable.

TS 3.6.1.6, Containment Structural Integrity

The current TS Actions require performing an engineering evaluation and submitting a special report if the results of inspections of the containment tendons or containment exterior surfaces do not meet acceptance standards. FPL proposes to delete the requirements to perform engineering evaluations and submit special reports.

The containment tendons and the containment exterior surfaces are examined in accordance with the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Plants," and the modifications presented in 10 CFR 50.55a(b)(2)(viii), "Examination of concrete containments," as modified by approved exemptions. Requirements for preparing an engineering evaluation for examination results that do not meet acceptance standards and requirements for reporting are addressed under Subsections IWA and IWL of the ASME Code, as regulated by 10 CFR 50.55a. Repeating these federal regulations in the TS is not necessary to ensure safe plant operation; therefore, FPL concludes that deleting the requirements to perform engineering evaluations and submit special reports is appropriate.

TS 3.7.7, Sealed Source Contamination

The TS requires submitting a report on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microCurie of removable contamination. FPL proposes to delete this reporting requirement.

TS 3.7.7 requires sealed sources to be free of greater than or equal to 0.005 microCurie of removable contamination. The limitations on removable contamination for sources requiring leak testing is based on 10 CFR 70.39(a)(3) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. With removable contamination above the limit, the TS required Action is to immediately withdraw the sealed source from use and either decontaminate and repair the sealed source, or dispose of the sealed source.

FPL is not proposing any changes to the TS 3.7.7 requirements other than deletion of the annual reporting requirement, so the current required action is retained in the TS. In addition, identification of a source exceeding the allowable limits would be entered into the corrective action program, which is subject to NRC audit. Therefore, the report required by TS 3.7.7 would not provide any new or additional information for the NRC staff. The report is not necessary to ensure safe plant operation and does not provide a safety benefit. NUREG-1431 does not contain a TS or reporting requirements related to sealed sources. Moreover, SR 4.7.7.3, which requires submitting the annual report, is not necessary to meet 10 CFR 50.356(c)(3). Therefore, FPL concludes that deletion of the reporting requirement is appropriate.

TS 3.8.1.1, A.C. Sources - Operating

The current TS include four-hour NRC notification requirements for certain inoperable AC sources. FPL proposes to delete these reporting requirements from the TS.

TS 3.8.1.1 requires operable AC power sources consisting of three emergency diesel generators and two startup transformers. TS 3.8.1.1 ACTION c requires notifying the NRC within four hours of declaring a startup transformer and an emergency diesel generator inoperable. Similarly, ACTION e requires a four-hour notification in the event two startup transformers become inoperable. However, NUREG-1431 does not include such reporting requirements for inoperable AC sources.

10 CFR 50.72(b)(2) provides criteria for four-hour reports to the NRC, and inoperability of a portion of a plant's required AC sources does not meet that reporting threshold under this regulation. Degradation of AC sources would be immediately reportable in accordance with 10 CFR 50.72 for a more severe condition, such as a condition that resulted in a plant shutdown required by the TS or the declaration of an emergency class. In addition, inoperability of AC sources that results in the inability to fulfill a safety function would be reportable in accordance with 10 CFR 50.72 and 10 CFR 50.73.

The four-hour reporting requirements included in current TS 3.8.1.1 are inconsistent with NUREG-1431 and are excessive because they extend beyond the immediate reporting criteria in 10 CFR 50.72. The reporting requirements are not necessary to assure safe operation of the facility; rather, the TS Actions ensure safe operation by providing remedial measures for inoperable AC sources, which include directing a plant shutdown if the required AC sources are not restored within specified times. The current reporting requirements are an unnecessary burden on FPL and NRC resources. FPL concludes that elimination of these reporting requirements from the TS is acceptable because 10 CFR 50.72 and 10 CFR 50.73 adequately address reporting related to the plant's electrical power sources and the proposed change is consistent with NUREG-1431.

TS 3.9.11, Fuel Storage Pool Water Level

TS 3.9.11 requires a minimum water level in the spent fuel storage pool to ensure that sufficient shielding will be available during fuel movement and for removal of iodine in the event of a fuel handling accident. The minimum water depth is consistent with the safety analysis assumption that a minimum water depth of 23 feet is maintained above the damaged fuel assembly. With this level requirement not met, the Action provides four hours to restore the water level to the required value. The TS also contains the footnote below, which allows suspending the requirements of TS 3.9.11 for maintenance.

> *The requirements of this specification may be suspended for more than 4 hours to perform maintenance provided a 10 CFR 50.59 evaluation is prepared prior to suspension of the above requirement and all movement of fuel assemblies and crane operation with loads in the fuel storage areas are suspended. If the level is not restored within 7 days, the NRC shall be notified within the next 24 hours.*

FPL proposes to revise TS 3.9.11 by deleting the footnote and the four-hour completion time for restoring spent fuel pool water level.

With the spent fuel storage pool level less than required, TS 3.9.11 ACTION a states: "…suspend all movement of fuel assemblies and crane operations with loads in the fuel storage areas and restore the water level to within its limit within 4 hours." The actions to suspend movement of fuel assemblies and suspend crane operations are appropriate when the water level is less than assumed for a fuel handling accident because these actions effectively preclude a fuel handling accident from occurring. Although the action also directs restoration of water level to within limits in four hours, this action is not necessary to preclude the occurrence of a fuel handling accident.

The footnote to the TS allows the LCO to be suspended and requires a 24-hour NRC notification if the suspension exceeds seven days. This allowance permits the suspension provided a 10 CFR 50.59

evaluation is prepared prior to the extension. Deleting the four-hour completion time for restoring water level as proposed above eliminates the need for this footnote. Further, the process provided in 10 CFR 50.59 is used to determine whether implementation of a change requires prior NRC approval and is not appropriate for justifying suspension of a TS requirement. In addition, the footnote requires a 24-hour NRC notification if suspension of the TS requirement exceeds seven days. This reporting requirement is not necessary to ensure safe operation of the facility because movement of fuel assemblies and crane operations are suspended when water level does not meet the minimum requirement, precluding the occurrence of a fuel handling accident.

The proposed changes to TS 3.9.11 preserve the safety analysis assumption regarding spent fuel pool level for a fuel handling accident. The revised Action will preclude the possibility of a fuel handling accident if the analysis assumption for minimum water level is not met. The proposed changes are also consistent with STS 3.7.15, Fuel Storage Pool Water Level. Therefore, FPL concludes that the proposed changes are acceptable.

TS 5.3.1, Fuel Assemblies

The current TS requires submitting a 30-day special report if more than 30 individual rods in the core or ten fuel rods in any fuel assembly are replaced in a refueling. Consistent with NUREG-1431, which does not include a similar reporting requirement, FPL proposes to delete this reporting requirement.

Each cycle-specific core reload is implemented using NRC approved methodologies and FPL's design change process. The core design is implemented without prior NRC approval if determined acceptable following a review under 10 CFR 50.59. Information regarding core design changes implemented during a refueling is available to the NRC through resident inspector activities and 10 CFR 50.59 documents, which are subject to NRC review. Therefore, the 30-day special report currently required by TS 5.3.1, which does not seek any NRC approval, is not required to assure safe operation of the facility.

TS 6.1, Responsibility; TS 6.2, Organization

TS 6.1.1 assigns the Plant General Manager responsibility for overall operation of both units. FPL proposes to replace the plant-specific position title with the generic title "plant manager." The proposed change is consistent with NUREG-1431, which uses "plant manager" rather than a plant-specific position title, and it does not change or reassign the responsibility for overall operation of the units. Administrative in nature, the proposed change will reduce burden on FPL and NRC resources by eliminating the need to process a license amendment as the result of an inconsequential change to the plant-specific title of the position that is assigned overall responsibility for operation of the units.

TS 6.1.2 assigns responsibility for the control room command function and directs issuance of an annual management directive regarding this responsibility. FPL proposes to revise TS 6.1.2 consistent with STS 5.1.2 in NUREG-1431 and with the requirement currently contained in Turkey Point TS Table 6.2-1 regarding the control room command function. The change also deletes the requirement to issue a management directive regarding the control room command function because the directive is redundant to the requirement imposed by the proposed change to TS 6.1.2 and, therefore, is unnecessary.

The proposed change to TS 6.1.2 does not involve any technical changes and does not modify the responsibility for the control room command function. The change is administrative in nature since it makes editorial changes consistent with NUREG-1431 and combines the current requirements for the control room command function in TS 6.1.2 and Table 6.2-1. Therefore, FPL concludes that the proposed change is acceptable.

The proposed change revises the plant-specific position title in TS 6.2.2.h from Operations Supervisor to Assistant Operations Manager - Line, and the title Shift Manager replaces Nuclear Plant Supervisor in Table 6.2-1. This is an administrative change that neither alters the organization nor changes any responsibilities; therefore, FPL concludes the change is acceptable.

TS 6.9.1.1, Startup Report

The current TS require periodic submittal of a Startup Report that provides a summary of plant startup and power ascension testing. FPL proposes to delete the requirement to submit this report.

In October of 1971, the NRC published Regulatory Guide (RG) 1.16 to provide an acceptable basis for meeting the reporting requirements listed in Appendix A, "Technical Specifications Related to Heath and Safety," of the facility operating license. This RG provided a description of each of the routine reports, including the plant Startup Report that licensees are required to submit to demonstrate compliance with TS reporting requirements. However, in August 2009, in Federal Register 74 FR 40244, the NRC withdrew RG 1.16 because it was no longer needed on the basis that TS reporting requirements are contained in 10 CFR 50 as well as other parts of 10 CFR Chapter 1.

Chapter 5, Administrative Controls, of NUREG-1431, which contains guidance on the content and frequency of required reports, does not include a requirement to submit a Startup Report. Further, information provided in the plant Startup Report is readily available to the NRC for inspection by the NRC Resident Inspectors. No information submitted in the Startup Report seeks NRC approval for plant operations. Considering that the Startup Report is not required to be submitted less than 90 days or nine months following the completion of various milestones, the report is not necessary to ensure operation of the facility in a safe manner. Therefore, FPL proposes to delete the requirement to provide a Startup Report.

TS 6.9.1.2, Annual Reports

The TS requires annual reporting of the results of specific activity analyses in which the primary coolant exceeded the limits of TS 3.4.8, Specific Activity. FPL proposes to delete this annual report.

In addition to annual reporting under TS 6.9.1.2, FPL reports RCS specific activity by means of the performance indicators under the Reactor Oversight Program (ROP). As part of the ROP Program, Turkey Point currently provides monthly reactor coolant specific activity data on a quarterly basis to the NRC in accordance with Regulatory Issue Summary (RIS) 2000-08, Revision 1, "Voluntary Submission of Performance Indicator Data" [Reference 5] following the guidelines provided in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline" [Reference 6]. The RCS specific activity is provided more frequently than required by the annual report, regardless of whether or not the TS limit is exceeded.

Nuclear plants added this reporting requirement in response to Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes." However, as discussed in the Safety Evaluation for Amendment 175 for Virgil C. Summer Nuclear Station (Amendment Regarding Elimination of Monthly Operating Reports and Certain Annual Reports) [Reference 7], which approved deletion of the reporting requirement pertaining to specific activity; this reporting requirement is no longer common within TS for nuclear power plants and is not within STS. Additionally, the NRC would expect to obtain information about such events or conditions through reports submitted in accordance with 10 CFR 50.72 and 10 CFR 50.73. For example, exceeding the limits of TS 3.4.8 limits requires a plant shutdown if the activity is not restored to within limits within the specified time period, and such a plant shutdown is required to be reported by 10 CFR 50.72. The NRC also obtains information about plant events and adverse conditions through its inspection program.

The specific activity analysis reported annually does not report any information different from the performance indicator under the ROP unless the activity exceeds the TS 3.4.8 limit. Deletion of the report is intended to eliminate unnecessary use of NRC and plant resources in providing redundant data. The limit is not expected to be exceeded unless a significant fuel issue occurs. In the event that a fuel failure occurs, the condition would be captured in the corrective action program and evaluated for reportability and for the cause. This information would be available for NRC review through its inspection program.

Providing an annual report on RCS activity for the previous year does not ensure continued safe operation of the facility, and the STS do not require such a report. Further, RCS activity is provided to the NRC on a quarterly basis under the ROP. Therefore, FPL concludes that the annual report providing the results of RCS activity analyses provides little or no safety benefit and is not necessary.

TS 6.14, Offsite Dose Calculation Manual (ODCM)

Administrative TS 6.14.2.b stipulates that licensee-initiated changes to the ODCM become effective after approval of the Plant General Manager. FPL proposes to replace the plant-specific position title with the generic title "plant manager." The proposed change is consistent with NUREG-1431, which uses "plant manager" rather than a plant-specific position title, and it does not change or reassign the responsibility for approval of changes to the ODCM. Administrative in nature, the proposed change will reduce burden on FPL and NRC resources by eliminating the need to process a license amendment as the result of an inconsequential change to the plant-specific title of the position that is assigned overall responsibility for operation of the units.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements / Criteria

- 10 CFR 50.36, *Technical specifications* - establishes the requirements for the technical specifications. Specifically, section c(3) of 10 CFR 50.36 requires surveillance requirements to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met; and section c(5) requires that the Administrative Controls section of TS include reporting requirements that assure operation of the facility in a safe manner.
- 10 CFR 50.54. *Condition of licenses* - specifies requirements regarding responsibilities and staffing of licensed operators.
- 10 CFR 50.72, *Immediate notification requirements for operating nuclear power reactors*, and 10 CFR 50.73, *Licensee event report system* - provide the requirements for making prompt notifications and submitting written reports to the NRC. These regulations cover a broad spectrum of events including emergency system actuations, unanalyzed conditions, and inability of equipment to fulfill a safety function.
- 10 CFR 70.39, *Specific licenses for the manufacture or initial transfer of calibration or reference sources* -establishes limitations on removable contamination for sources.
- 10 CFR 50.55a, *Codes and standards* - requires that nuclear plants meet the requirements of the ASME Boiler and Pressure Vessel Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants. Section b(2)(viii), *Section XI condition: Concrete containment examinations*, addresses applying Subsection IWL.

The proposed changes are consistent with the above regulatory requirements.

4.2 Precedent

The NRC approved changes in the amendments below similar to those proposed by FPL.

- Three Mile Island Amendment 284 [Reference 8]
  - Deleted special report regarding the presence of removable contamination on sources on the bases that the current TS Action is retained, the condition would be entered in the corrective action program, and the special report would not provide any new or additional information to the NRC staff.
  - Deleted the Startup Report because the proposed change was consistent with the STS and report completion and submittal is not necessary to ensure operation of the facility in a safe manner.
  - Deleted annual report of the results of specific activity analysis in which the primary coolant exceeded the TS limit. The change was acceptable on the bases that the NRC would expect to obtain notification of such events through 10 CFR 50.72, 10

CFR 50.73, and through its inspection program. In addition, the TS would require a plant shutdown if the activity is not restored to limits within the specified time period, and such a plant shutdown would be required to be reported by 10 CFR 50. 72. There is no need to repeat the same requirement in the licensee's TS.

- Limerick Amendments 211 and 172 [Reference 9]
  - Deleted the special report for ECCS actuation and injection into the RCS based on the reporting requirements in 10 CFR 50.73 and the site's monitoring of transients to ensure that transient cycle events do not exceed the limits in the UFSAR.
  - Deleted special report regarding the presence of removable contamination on sealed sources on the basis that the surveillance requirements are sufficient to ensure the LCO is met and the reporting requirement is not needed to meet 10 CFR 50.36(c)(3).
  - Deleted the Startup Report on the basis that the requirements in the report are not necessary to ensure operation of the facility in a safe manner.
  - Deleted the annual report of the results of specific activity analysis in which the primary coolant exceed the TS limit. The change was found acceptable based on the reporting requirements in 10 CFR 50.72 and 50.73, the specific activity reporting provided under the ROP Performance Indicator Program, and the requirements in TS for specific activity.
- Farley Amendments 172 and 165 [Reference 10]
  - Deleted TS 5.6.9, Tendon Surveillance Report, which required reporting abnormal degradation of containment conditions to the NRC. The NRC concluded that the report is no longer required because all reportable events are addressed under Subsections IWA and IWL of the ASME Code, as regulated by 10 CFR 50.55a, and it is not necessary to repeat these Federal regulations in the TS to ensure safe plant operation. Also, since the reporting requirements will be in accordance with 10 CFR 50.55a(b)(2)(viii), the provisions of TS 5.6.9 are no longer necessary and are deleted from the TS.

4.3 Significant Hazards Consideration

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Florida Power & Light Company (FPL) requests a license amendment to revise the Technical Specifications (TS) for Turkey Point Units 3 and 4. The proposed change deletes certain reporting requirements from the TS, revises the Action requirements in TS 3.5.2, Emergency Core Cooling Systems; revises the administrative TS regarding plant staff and responsibilities, and corrects a misspelling in TS 3.3.3.2, Movable Incore Detectors.

In accordance with 10 CFR 50.92, Florida Power & Light Company (FPL) has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed change does not involve a SHC is as follows:

1. *Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?*

   Response: No

   The actions, surveillance requirements, and administrative controls associated with the proposed changes to the technical specifications (TS) are not initiators of any accidents previously evaluated, so the probability of accidents previously evaluated is unaffected by the proposed changes. The proposed changes do not alter the design, function, operation, or configuration of any plant structure, system, or component (SSC). The capability of any operable TS-required SSC to perform its specified safety function is not impacted by the proposed changes. As a result, the outcomes of accidents previously evaluated are unaffected. Therefore, the proposed changes do not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?*

   Response: No.

   The proposed changes do not challenge the integrity or performance of any safety-related systems. No plant equipment is installed or removed, and the changes do not alter the design, physical configuration, or method of operation of any plant SSC. No physical changes are made to the plant, so no new causal mechanisms are introduced. Therefore, the proposed changes to the TS do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *Does the proposed amendment involve a significant reduction in a margin of safety?*

   Response: No.

   The ability of any operable SSC to perform its designated safety function is unaffected by the proposed changes. The proposed changes do not alter any safety analyses assumptions, safety limits, limiting safety system settings, or method of operating the plant. The changes do not adversely impact plant operating margins or the reliability of equipment credited in the safety analyses. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above, FPL concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(b), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusion

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

FPL has evaluated the proposed amendment for environmental considerations. The review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set for in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. NUREG-1431, Standard Technical Specifications - Westinghouse Plants, Revision 4, April 2012
2. NUREG-0800, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition - Technical Specifications, Revision 3, March 2010
3. Technical Specifications Task Force Traveler TSTF-258-A, Changes to Section 5.0, Administrative Controls, Revision 4, June 29, 1999
4. NRC letter "Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Issuance of Amendments Regarding Emergency Core Cooling Technical Specifications (CAC Nos. MF5177and MF5178)," November 9, 2015 (ML15294A443)
5. NRC Regulatory Issue Summary 2000-08, Voluntary Submission of Performance Indicator Data, Revision 1, February 19, 2009
6. Nuclear Energy Institute (NEI) 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 7, August 31, 2013
7. NRC letter "Virgil C. Summer Nuclear Station, Unit No. 1, Issuance of Amendment Regarding Elimination of Monthly Operating Reports and Certain Annual Report (TAC No. MC9155)," May 19, 2006 (ML060180054)

8. NRC letter "Three Mile Island Nuclear Station, Unit 1 - Issuance of Amendment to Eliminate Certain Technical Specifications Reporting Requirements (TAC No. MF0628)," December 30, 2014 (ML14330A300)

9. NRC letter "Limerick Generating Station, Units 1 and 2 - Issuance of Amendments Re: Elimination of Certain Technical Specification Reporting Requirements (TAC Nos. MF1399 and MF1400)," March 26, 2014 (ML13214A092)

10. NRC letter "Joseph M. Farley Nuclear Plat, Units 1 and 2 - Issuance of Amendments Re: Containment Tendon Surveillance Program (TAC Nos. MC2705 and MC2706)," April 14, 2006 (ML060830380)

ATTACHMENT 1

Markup of the Technical Specifications

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REACTIVITY CONTROL SYSTEMS

MODERATOR TEMPERATURE COEFFICIENT

LIMITING CONDITION FOR OPERATION

3.1.1.3 The moderator temperature coefficient (MTC) shall be within the limits specified in the COLR. The maximum upper limit shall be less positive than or equal to +5.0 x 10^{-5} Δk/k/°F for all the rods withdrawn, beginning of cycle life (BOL), for power levels up to 70% RATED THERMAL POWER with a linear ramp to 0 Δk/k/°F at 100 % RATED THERMAL POWER.

APPLICABILITY: Beginning of cycle life (BOL) - MODES 1 and 2* only**.
End of life (EOL) - MODES 1, 2, and 3 only**.

ACTION:

a. With the MTC more positive than the BOL limit specified in the COLR, operation in MODES 1 and 2 may proceed provided:

1. Control rod withdrawal limits are established and maintained sufficient to restore the MTC to less positive or equal to the BOL limit specified in the COLR within 24 hours or be in HOT STANDBY within the next 6 hours. These withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6;

2. The control rods are maintained within the withdrawal limits established above until a subsequent calculation verifies that the MTC has been restored to within its limit for the all rods withdrawn condition~~; and~~ .

~~3. A Special Report is prepared and submitted to the Commission, pursuant to Specification 6.9.2, within 10 days, describing the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.~~

* With K_{eff} greater than or equal to 1.

** See Special Test Exceptions Specification 3.10.3.

POWER DISTRIBUTION LIMITS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

2. Reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within 2 hours and reduce the Power Range Neutron Flux-High Trip Setpoints to less than or equal to 55% of RATED THERMAL POWER within the next 4 hours; and

3. Identify and correct the cause of the out-of -limit condition prior to increasing THERMAL POWER; subsequent POWER OPERATION above 50% of RATED THERMAL POWER may proceed provided that the QUADRANT POWER TILT RATIO is verified within its limit at least once per hour for 12 hours or until verified at 95% or greater RATED THERMAL POWER.

d. The provisions of Specifications 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.2.4.1 The QUADRANT POWER TILT RATIO shall be determined to be within the limit above 50% of RATED THERMAL POWER by:

a. Calculating the ratio in accordance with the Surveillance Frequency Control Program when the Power Range Upper Detector High Flux Deviation and Power Range Lower Detector High Flux Deviation Alarms are OPERABLE, and

b. Calculating the ratio at least once per 12 hours during steady-state operation when either alarm is inoperable.

4.2.4.2 The QUADRANT POWER TILT RATIO shall be determined to be within the limit when above 75% of RATED THERMAL POWER with one Power Range channel inoperable by using the movable incore detectors to confirm that the normalized symmetric power distribution, obtained either from two sets of four symmetric thimble locations or full-core flux map, or by incore thermocouple map is consistent with the indicated QUADRANT POWER TILT RATIO in accordance with the Surveillance Frequency Control Program.

~~4.2.4.3 If the QUADRANT POWER TILT RATIO is not within its limit within 24 hours and the POWER DISTRIBUTION LIMITS of 3.2.2 and 3.2.3 are within their limits, a Special Report in accordance with 6.9.2 shall be submitted within 30 days including an evaluation of the cause of the discrepancy.~~

INSTRUMENTATION

MOVABLE INCORE DETECTORS

LIMITING CONDITION FOR OPERATION

3.3.3.2 The Movable Incore Detection System shall be OPERABLE with:

a. At least 16 detector thimbles when used for recalibration and check of the Excore Neutron Flux Detection System and monitoring the ~~QUADRANT~~ QUADRANT POWER TILT RATIO*, and at least 38 detector thimbles when used for monitoring $F^{N}_{\Delta H}$, $F_Q(Z)$ and $F_{xy}(Z)$.

b. A minimum of two detector thimbles per core quadrant, and

c. Sufficient movable detectors, drive, and readout equipment to map these thimbles.

APPLICABLITY: When the Movable Incore Detection System is used for:

a. Recalibration of the Excore Neutron Flux Detection System, or

b. Monitoring the QUADRANT POWER TILT RATIO*, or

c. Measurement of $F^{N}_{\Delta H}$, $F_Q(Z)$ and $F_{xy}(Z)$.

ACTION:

With the Movable Incore Detection System inoperable, do not use the system for the above applicable monitoring or calibration functions. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.2 The Movable Incore Detection System shall be demonstrated OPERABLE in accordance with the Surveillance Frequency Control Program by normalizing each detector output when required for:

a. Recalibration of the Excore Neutron Flux Detection System, or

b. Monitoring the QUADRANT POWER TILT RATIO*, or

c. Measurement of $F^{N}_{\Delta H}$, $F_Q(Z)$ and $F_{xy}(Z)$.

* Exception to the 16 detector thimble requirement of monitoring the QUADRANT POWER TILT RATIO is acceptable when performing Specification 4.2.4.2 using two sets of four symmetric thimbles.

REACTOR COOLANT SYSTEM

OVERPRESSURE MITIGATING SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.9.3 The high pressure safety injection flow paths to the Reactor Coolant System (RCS) shall be isolated, and at least one of the following Overpressure Mitigating Systems shall be OPERABLE:

a. Two power-operated relief valves (PORVs) with a lift setting of ≤ 448 psig, or

b. The RCS depressurized with a RCS vent of greater than or equal to 2.20 square inches.

APPLICABILITY MODES 4 (when the temperature of any RCS cold leg is less than or equal to 275°F), 5, and 6 with the reactor vessel head on.

ACTION:

a. With the high pressure safety injection flow paths to the RCS unisolated, restore isolation of these flow paths within 4 hours.

b. With one PORV inoperable in MODE 4 (when the temperature of any RCS cold leg is less than or equal to 275°F), restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 2.20 square inch vent within the next 8 hours.

c. With one PORV inoperable in Modes 5 or 6 with the reactor vessel head on, either (1) restore the inoperable PORV to OPERABLE status within 24 hours, or (2) complete depressurization and venting of the RCS through at least a 2.20 square inch vent within a total of 32 hours, or (3) complete depressurization and venting of the RCS through at least one open PORV and associated block valve within a total of 32 hours.

d. With both PORVs inoperable, either restore one PORV to OPERABLE status or complete depressurization and venting of the RCS through at least a 2.20 square inch vent within 24 hours.

~~e.~~ ~~In the event either the PORVs or a 2.20 square inch vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence. A Special Report is not required when such a transient is the result of water injection into the RCS for test purposes with an open vent path.~~

e. ~~f.~~ The provisions of Specification 3.0.4 are not applicable.

INSERT 3.5.2.a

a. With one of the following components inoperable:

   1. RHR heat exchanger,
   2. RHR suction flow path from the containment sump,
   3. RHR parallel injection flow path, or
   4. SI parallel injection flow path

   Restore the inoperable component to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.2 ECCS SUBSYSTEMS - T_{avg} GREATER THAN OR EQUAL TO 350°F

LIMITING CONDITION FOR OPERATION

3.5.2 The following Emergency Core Cooling System (ECCS) equipment and flow paths shall be OPERABLE:

a. Four Safety Injection (SI) pumps, each capable of being powered from its associated OPERABLE diesel generator#, with discharge flow paths aligned to the RCS cold legs,*

b. Two RHR heat exchangers,

c. Two RHR pumps with discharge flow paths aligned to the RCS cold legs,

d. A flow path capable of taking suction from the refueling water storage tank as defined in Specification 3.5.4, and

e. Two flow paths capable of taking suction from the containment sump.

APPLICABILITY: MODES 1, 2, and 3**.

ACTION:

INSERT 3.5.2.a

a. ~~With one RHR heat exchanger or suction flow path from the containment sump inoperable, restore the inoperable RHR heat exchanger or suction flow path from the containment sump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

Deleted

b. ~~In the event the ECCS is actuated and injects water in the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date since January 1, 1990.~~

c. With one of the four required Safety Injection pumps or its associated discharge flow path inoperable and the opposite unit in MODE 1, 2, or 3, restore the pump or flow path to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours.***

*Only three Safety Injection (SI) pumps (two associated with the unit and one from the opposite unit), each capable of being powered from its associated OPERABLE diesel generator#, with discharge flow paths aligned to the RCS cold leg are required if the opposite unit is in MODE 4, 5, or 6.

**The provisions of Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODE 3 for the Safety Injection flow paths isolated pursuant to Specification 3.4.9.3 provided that the Safety Injection flow paths are restored to OPERABLE status prior to Tavg exceeding 380°F. Safety Injection flow paths may be isolated when Tavg is less than 380°F.

***The provisions of Specifications 3.0.4 and 4.0.4 are not applicable.

#Inoperability of the required diesel generators does not constitute inoperability of the associated Safety Injection pumps.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, the following ECCS components and flow path shall be OPERABLE:

a. One OPERABLE RHR heat exchanger,

b. One OPERABLE RHR pump, and

c. An OPERABLE flow path capable of (1) taking suction from the refueling water storage tank upon being manually realigned and (2) transferring suction to the containment sump during the recirculation phase of operation.

APPLICABILITY: MODE 4.

ACTION:

a. With no OPERABLE ECCS flow path from the refueling water storage tank, restore at least one ECCS flow path to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 24 hours.

b. With either the residual heat removal heat exchanger or RHR pump inoperable, restore the components to OPERABLE status or maintain the Reactor Coolant System T_{avg} less than 350°F by use of alternate heat removal methods.

~~c.~~ ~~In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date since January 1, 1990.~~

SURVEILLANCE REQUIREMENTS

4.5.3 The above ECCS components shall be demonstrated OPERABLE per the applicable requirements of Specification 4.5.2.

CONTAINMENT SYSTEMS

CONTAINMENT STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment shall be maintained at a level consistent with the acceptance criteria in Specification 4.6.1.6.

APPLICABILITY MODES 1, 2, 3, and 4.

ACTION:

a. With more than one tendon with an observed lift-off force between 90% and 95% of the predicted force, or with one tendon below 90% of the predicted force, restore the tendon(s) to the required level of integrity within 15 days ~~and perform an engineering evaluation of the containment and provide a Special Report to the Commission within 30 days in accordance with Specification 6.9.2~~ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With the average of all measured tendon forces for each type of tendon (dome, vertical, and hoop), including those measured in ACTION a., less than the predicted force, restore the tendon(s) to the required level of integrity within 15 days ~~and perform an engineering evaluation of the containment and provide a Special Report to the Commission within 30 days in accordance with Specification 6.9.2~~ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

c. With any abnormal degradation of the structural integrity other than ACTION a. and ACTION b., at a level below the acceptance criteria of Specifications 4.6.1.6.1, 4.6.1.6.2 and 4.6.1.6.3, restore the containment to the required level of integrity within 72 hours ~~and perform an engineering evaluation of the containment and provide a Special Report to the Commission within 15 days in accordance with Specification 6.9.2~~ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUREMENTS

4.6.1 .6.1 Containment Tendons. The containment tendons and the containment exterior surfaces shall be examined in accordance with ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, “Requirements for Class CC Concrete Components of Light-Water Cooled Plants,” and the modifications presented in 10 CFR 50.55a(b)(2)(viii), “Examination of concrete containments,” as modified by approved exemptions. The containment structural integrity shall be demonstrated during the inspection periods specified in IWL-2410 and IWL-2420. The tendons’ structural integrity shall be demonstrated by:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous 6 months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use; and

c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source.

Deleted

4.7.7.3 ~~Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microCurie of removable contamination.~~

4.7.7.4 A complete inventory of licensed radioactive materials in possession shall be maintained current at all times.

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

startup transformer and associated circuits within one hour and at least once per 8 hours thereafter; and if the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, unless the diesel generators are already operating; restore one of the inoperable sources to OPERABLE status in accordance with Action Statements a and b, as appropriate. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. ~~Notify the NRC within 4 hours of declaring both a start-up transformer and diesel generator inoperable.~~ Restore the other A.C. power source (startup transformer or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 Action Statement a or b, as appropriate, with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable A.C. power source.

d. With one diesel generator inoperable, in addition to ACTION b. or c. above, verify that:

1. All required systems, subsystems, trains, components, and devices (except safety injection pumps) that depend on the remaining required OPERABLE diesel generators as a source of emergency power are also OPERABLE.

   If this condition is not satisfied within 2 hours, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

2. At least two Safety Injection pumps are OPERABLE and capable of being powered from their associated OPERABLE diesel generators.

   If this condition is not satisfied within 2 hours, be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours. This ACTION applies to both units simultaneously.

e. With two of the above required startup transformers or their associated circuits inoperable ~~notify the NRC within 4 hours~~; restore at least one of the inoperable startup transformers to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours* and in COLD

*If the opposite unit is shutdown first, this time can be extended to 42 hours.

REFUELING OPERATIONS

3/4.9.11 WATER LEVEL - STORAGE POOL

LIMITING CONDITION FOR OPERATION

3.9.11 The water level shall be maintained greater than or equal to elevation 56’ - 10” the spent fuel storage pool.*

APPLICABILITY: Whenever irradiated fuel assemblies are in the storage pool.

ACTION:

a. With the requirements of the above specification not satisfied, suspend all movement of fuel assemblies and crane operations with loads in the fuel storage areas ~~and restore the water level to within its limit within 4 hours~~.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.11 The water level in the storage pool shall be determined to be at least its minimum required depth in accordance with the Surveillance Frequency Control Program when irradiated fuel assemblies are in the fuel storage pool.

~~*The requirements of this specification may be suspended for more than 4 hours to perform maintenance provided a 10 CFR 50.59 evaluation is prepared prior to suspension of the above requirement and all movement of fuel assemblies and crane operation with loads in the fuel storage areas are suspended. If the level is not restored within 7 days, the NRC shall be notified within the next 24 hours.~~

3/4.9.12 DELETED

5.0 DESIGN FEATURES

5.1 SITE

5.1.1 The site is approximately 25 miles south of Miami, 8 miles east of Florida City, and 9 miles southeast of Homestead, Florida

5.2 DELETED

5.3 REACTOR CORE

FUEL ASSEMBLIES

5.3.1 The core shall contain 157 fuel assemblies with each fuel assembly containing 204 fuel rods clad with Zircaloy-4, ZIRLO®, or Optimized ZIRLO™ except that replacement of fuel rods by filler rods consisting of stainless steel, or by vacant rod positions, may be made in fuel assemblies if justified by cycle-specific reload analysis using NRC-approved methodology. The reactor core contains approximately 71 metric tons of uranium in the form of natural or slightly enriched uranium dioxide pellets. Each fuel rod shall have a nominal active fuel length of 144 inches. ~~Should more than 30 individual rods in the core, or 10 fuel rods in any fuel assembly, be replaced per refueling, a Special Report discussing the rod replacements shall be submitted to the Commission within 30 days after cycle startup.~~

CONTROL ROD ASSEMBLIES

5.3.2 The core shall contain 45 full-length control rod assemblies. The full-length control rod assemblies shall contain a nominal 142 inches of absorber material. The absorber material shall be silver, indium, and cadmium. All control rods shall be clad with stainless steel tubing.

5.4 DELETED

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

plant manager

6.1.1 The ~~Plant General Manager~~ shall be responsible for overall unit operation of both units and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 ~~The Nuclear Plant Supervisor (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Site Vice President shall be reissued to all station personnel on an annual basis.~~

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for facility operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to, and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Quality Assurance Topical Report and updated in accordance with 10 CFR 50.54(a)(3).

b. The Chief Nuclear Officer shall have corporate responsibility for overall plant nuclear safety, and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

plant manager

c. The ~~Plant General Manager~~ shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.

e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the Health Physics Supervisor shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

The Shift Manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while either unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while both units are in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

ADMINISTRATIVE CONTROLS

PLANT STAFF

6.2.2 The plant organization shall be subject to the following:

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

b. DELETED

c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips. In addition, while either unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;

d. A Health Physics Technician* shall be on site when fuel is in the reactor;

e. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and

f. DELETED

h. The ~~Operations Supervisor~~ Assistant Operations Manager - Line shall hold a Senior Reactor Operator License.

i. The Operations Manager shall either:

1. hold or have held a Senior Reactor Operator License on the Turkey Point Plant; or,

2. have held a Senior Reactor Operator License on a similar plant (i.e., another pressurized water reactor); or

3. have completed the Turkey Point Plant Senior Management Operations Training Course. (i.e., certified at an appropriate simulator for equivalent senior operator knowledge level.)

* The Health Physics Technician composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

ADMINISTRATIVE CONTROLS

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION		
	BOTH UNITS IN MODE 1, 2, 3, or 4	BOTH UNITS IN MODE 5 or 6 OR DEFUELED	ONE UNIT IN MODE 1, 2, 3, or 4 AND ONE UNIT IN MODE 5 or 6 or DEFUELED
~~NPS~~ SM	1	1	1
SRO	1	none**	1
RO	3*	2*	3*
AO	3*	3*	3*
STA	1***	none	1***

~~NPS~~ SM - ~~Nuclear Plant Supervisor~~ Shift Manager with a Senior Operator license
SRO - Individual with a Senior Operator license
RO - Individual with an Operator license
AO - Auxiliary Operator
STA - Shift Technical Advisor

The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

~~During any absence of the Nuclear Plant Supervisor from the control room while a unit is in MODE 1, 2, 3, or 4, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Nuclear Plant Supervisor from the control room while both units are in MODE 5 or 6, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.~~

* At least one of the required individuals must be assigned to the designated position for each unit.

** At least one licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling must be present during CORE ALTERATIONS on either unit, who has no other concurrent responsibilities.

***The STA position may be filled by the ~~Nuclear Plant Supervisor~~ SM or an individual with a Senior Operator license who meets the 1985 NRC Policy Statement on Engineering Expertise on Shift.

ADMINISTRATIVE CONTROLS

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC pursuant to 10 CFR 50.4.

Deleted

~~STARTUP REPORT~~

6.9.1 .1 ~~A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.~~

~~The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions of characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report. Subsequent Startup Reports shall address startup tests that are necessary to demonstrate the acceptability of changes and/or modifications.~~

~~Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.~~

Deleted

~~ANNUAL REPORTS*~~

6.9.1.2 ~~Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year.~~

~~Reports required on an annual basis shall include:~~

~~The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Fuel burnup by core region; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) History of degassing operations, if any, starting 48 hours prior to the first sample in which the limit was exceeded; and (5) The time duration when the specific activity of the primary coolant exceeded 0.25 microcuries per gram DOSE EQUIVALENT I-131.~~

~~* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.~~

ADMINISTRATIVE CONTROLS

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall contain the following:

a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program; and

b. The radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Annual Radioactive Effluent Release Reports required by Specification 6.9.1.3 and Specification 6.9.1.4.

6.14.2 Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

plant manager

b. Shall become effective after approval of the ~~Plant General Manager;~~ and

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

ATTACHMENT 2

Markup of the Technical Specifications Bases

ATTACHMENT 2
Technical Specification Bases
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3/4.4.9 (Continued)

Overpressure Mitigating System

The Technical Specifications provide requirements to isolate High Pressure Safety Injection from the RCS and to prevent the start of an idle RCP if secondary temperature is more than 50°F above the RCS cold leg temperatures. These requirements are designed to ensure that mass and heat input transients more severe than those assumed in the low temperature overpressurization protection analysis cannot occur.

The OPERABILITY of two PORVs or an RCS vent opening of at least 2.20 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs are less than or equal to 275°F. Either PORV has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either: (1) The start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 50°F above the RCS cold leg temperatures including margin for instrument error, or (2) The start of a HPSI pump and its injection into a water-solid RCS. ~~When the PORVs or 2.2 square inch area vent is used to mitigate a plant transient, a Special Report is submitted. However, minor increases in pressure resulting from planned plant actions, which are relieved by designated openings in the system, need **NOT** be reported.~~

Associated requirements for accomplishing specific tests and verifications in SR 4.4.9.3.1.a and 4.4.9.3.1.d allow a 12 hour delay after decreasing RCS cold leg temperature to ≤ 275°F. The bases for the 12 hour relief in completing the ANALOG CHANNEL OPERATION TEST (ACOT) and verifying the OPERABILITY of the backup Nitrogen supply are provided in the proposed license amendment correspondence L-2000-146 and in the NRC Safety Evaluation Report provided in the associated Technical Specification Amendments 208/202 effective October 30, 2000.

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3/4.5.2 & 3/4.5.3 (Continued)

TS 3.5.2, Action g. provides an allowed outage/action completion time (AOT) of up to 7 days to restore an inoperable RHR Pump to OPERABLE status, provided the affected ECCS Subsystem is inoperable only because its associated RHR pump is inoperable. This 7 day AOT is based on the results of a deterministic and probabilistic safety assessment, and is referred to as a Risk-Informed AOT Extension. Planned entry into this AOT requires that a Risk Assessment be performed in accordance with the Configuration Risk Management Program (CRMP), which is described in the administrative procedure that implements the Maintenance Rule pursuant to 10 CFR 50.65. If an RHR pump suction isolation valve (3/4-752A or B) is CLOSED, then one of the two required flow paths from the containment sump becomes INOPERABLE and TS LCO 3.5.2.e is **NOT** met. In this case, TS 3.5.2, Action a, is entered and the AOT for the inoperable flow path is 72 hours.

TS 3.5.2, Action h. limits the allowed outage time for an inoperable RWST flow path from the RWST(s) required by TS 3.5.4 to 1 hour consistent with the allowed outage time for a required RWST.

TS 3.5.2 Action a applies with one of the following components inoperable:

- RHR heat exchanger,
- RHR suction flow path from the containment sump,
- RHR parallel injection flow path, or
- SI parallel injection flow path.

The RHR parallel injection flow paths are associated with MOV-744A and MOV-744B, and the SI parallel injection flow paths are associated with MOV-843A or MOV-843B. These flow paths are not associated with a specific RHR or SI pump. The Action provides 72 hours to restore the inoperable component to OPERABLE status before a plant shutdown is required. If the discharge flow path associated with only a single RHR or SI pump is inoperable, Action c, d, e, or g, as appropriate is applicable.

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3/4.6.1.6 (Continued)

~~The required Special Reports from any engineering evaluation of containment abnormalities shall include a description of the tendon condition, the condition of the concrete (specially at tendon anchorages), the inspection procedures, the tolerances on cracking, the results of the engineering evaluation, and the corrective actions taken.~~

~~The submittal of a Special Report for a failed tendon surveillance is considered an administrative requirement and it does **NOT** impact the plant operability. The administrative requirements for Special Reports are defined in Technical Specifications Section 6.9.2.~~

3/4.6.1.7 Containment Ventilation System

The Containment Purge supply and exhaust isolation valves are required to be closed during a LOCA. When **NOT** purging, power to the purge valve actuators will be removed (sealed closed) to prevent inadvertent opening of these values. Maintaining these valves sealed closed during plant operation ensures that excessive quantities of radioactive materials will **NOT** be released via the Containment Purge System.

Leakage integrity tests with a maximum allowable leakage rate for Containment Purge supply and exhaust supply valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop. The 0.60 La leakage limit shall **NOT** be exceeded when the leakage rates determined by the leakage integrity tests of these valves are added to the previously determined total for all valves and penetrations subject to Type B and C tests.

3/4.6.2 Depressurization and Cooling Systems

3/4.6.2.1 Containment Spray System

The OPERABILITY of the Containment Spray System ensures that containment depressurization capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the safety analyses. Management of gas voids is important to Containment Spray System OPERABILITY.

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3/4.8.1, 3/4.8.2 & 3/4.8.3 (Continued)

As each Startup Transformer only provides the limited equivalent power of approximately one EDG to the opposite Units A-train 4160 volt bus, the allowable out-of-service time of 30 days has been applied before the opposite unit is required to be shutdown. Within 24 hours, a unit with an inoperable Startup Transformer must reduce THERMAL POWER to less than or equal to 30% RATED THERMAL POWER. The 30% RATED THERMAL POWER limit was chosen because at this power level the decay heat and fission product production has been reduced and the operators are still able to maintain automatic control of the Feedwater Trains and other unit equipment. At lower power levels the operators must use manual control with the Feedwater Bypass lines. By **NOT** requiring a complete unit shutdown, the plant avoids a condition requiring natural circulation and avoids intentionally relying on engineered safety features for non-accident conditions.

With one startup transformer and one of the three required EDGs inoperable, the unit with the inoperable transformer must reduce THERMAL POWER to less than or equal to 30% RATED THERMAL POWER within 24 hours, based on the loss of its associated Startup Transformer, whereas operation of the unit with the OPERABLE transformer is controlled by the limits for inoperability of the EDG. ~~The notification of a loss of Startup Transformers to the NRC (ACTION STATEMENT 3.8.1.1.c) is **NOT** a 10 CFR 50.72/50.73 requirement and as such will be made for information purposes only to the NRC Operations Center via commercial lines.~~