



10 CFR 50.90
L-2017-098
May 24, 2017

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

RE: Turkey Point Nuclear Plant, Units 3 and 4
Docket Nos. 50-250 and 50-251
Renewed Facility Operating Licenses DPR-31 and DPR-41

Supplement to Florida Power & Light Company letter L-2017-049, Response to Request for Additional Information Regarding License Amendment Request 246, Changes to Technical Specifications 3/4.7.5, Control Room Emergency Ventilation System (CREVS)

References:

1. Florida Power & Light Company letter L-2016-246, License Amendment Request 246, Changes to Technical Specifications 3/4.7.5, Control Room Emergency Ventilation System (CREVS), August 3, 2016 (ADAMS Accession No. ML 16230A003)
2. Florida Power & Light Company letter L-2017-013, Response to Request for Additional Information Regarding License Amendment Request 246, Changes to Technical Specifications 3/4.7.5, Control Room Emergency Ventilation System (CREVS), January 27, 2017 (ADAMS Accession No. ML17032A345)
3. Florida Power & Light Company letter L-2017-049, Response to Request for Additional Information Regarding License Amendment Request 246, Changes to Technical Specifications 3/4.7.5, Control Room Emergency Ventilation System (CREVS), March 31, 2017 (ADAMS Accession No. ML17090A331)

In Reference 1, Florida Power & Light Company (FPL) submitted license amendment request (LAR) 246 for Turkey Point Units 3 and 4, which modifies Technical Specification (TS) 3.7.5, Control Room Emergency Ventilation System, by revising the Limiting Conditions for Operation, Required Actions and Surveillance Requirements to reflect the current system design and to align the Turkey Point TS more closely with NUREG-1431, Standard Technical Specifications - Westinghouse Plants, Revision 4.0, (ADAMS Accession No. ML12100A222).

In References 2 and 3, FPL submitted additional information that the NRC determined is necessary to complete its review. Additionally in Reference 3, FPL modified a proposed change previously submitted in References 1 and 2 and provided a marked up version of the affected TS page and a retyped (clean copy) version with revision bars to identify the change.

FPL was subsequently made aware of inconsistencies in the TS marked up and clean copy versions of the affected TS page provided in Reference 3. One such inconsistency was the TS 3/4.7.5, ACTION b, requirement to immediately suspend the movement of irradiated fuel assemblies during MODES 1, 2, 3 and 4, which is redundant with the paragraph applicable to MODES 5, 6, or (anytime) during the movement of irradiated fuel assemblies. During discussion with NRC staff, it was agreed that a supplement to Reference 3 providing corrected marked up and clean copy versions of the affected TS page would be appropriate.

Attachment 1 to this letter provides the corrected marked up copy of the affected TS page. Attachment 2 provides the corrected retyped (clean copy) version of the affected TS page with revision bars to identify the proposed changes. Attachment 3 provides the affected TS Bases pages marked up to show the proposed changes. The TS marked up page, retyped (clean copy) TS page and TS Bases marked up pages supersede the corresponding pages provided in Reference 3. The TS Bases changes are provided for information only and will be incorporated in accordance with the TS Bases Control Program upon implementation of the approved amendment.

The supplements included in this response provide additional information that clarifies the application, does not expand the scope of the application as originally noticed, and should not change the NRC staff's original proposed no significant hazards consideration determination as published in the Federal Register.

This letter contains no new or revised regulatory commitments.

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

I declare under penalty of perjury that the foregoing is true and correct.
Executed on the 24th day of May 2017.

Sincerely,



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

Attachments

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

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION PAGE (MARK-UP)

(1 page follows)

PLANT SYSTEMS

3/4.7.5 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION (continued)

during MODES 1, 2, 3 or 4

Within

- b. With the Control Room Emergency Ventilation System inoperable due to an inoperable CRE boundary, ~~immediately suspend all movement of irradiated fuel in the spent fuel pool, and immediately initiate action to implement mitigating actions, and within 24 hours, verify mitigating actions ensure CRE occupant radiological and chemical hazards will not exceed limits, and CRE occupants are protected from smoke hazards, and restore CRE boundary to OPERABLE status within 90 days.~~

With the above requirements not met, be in at least HOT STANDBY within the next 6 hours for one Unit, or 12 hours for both Units, and in COLD SHUTDOWN within the following 30 hours.

With the Control Room Emergency Ventilation System inoperable due to an inoperable CRE boundary during MODES 5, 6 or during the movement of irradiated fuel assemblies, immediately suspend all movement of irradiated fuel.

- ~~1) With the requirements not met, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.~~
- ~~2) If this ACTION applies to both units simultaneously, be in HOT STANDBY within 12 hours and in COLD SHUTDOWN within the following 30 hours.~~

~~MODES 5 and 6:~~

- ~~e. With the Control Room Emergency Ventilation System inoperable~~++~~, immediately suspend all operations involving CORE ALTERATIONS, movement of irradiated fuel in the spent fuel pool, or positive reactivity changes. This ACTION shall apply to both units simultaneously.~~

SURVEILLANCE REQUIREMENTS

4.7.5 The Control Room Emergency Ventilation System shall be demonstrated OPERABLE:

- a. In accordance with the Surveillance Frequency Control Program by verifying that the control room air temperature is less than or equal to 120°F; /
- b. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes~~***~~; /
- c. In accordance with the Surveillance Frequency Control Program or (1) after 720 hours of system operation, or (2) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (3) following exposure of the filters to effluents from painting, fire, or chemical release in any ventilation zone communicating with the system that may have an adverse effect on the functional capability of the system, or (4) after complete or partial replacement of a filter bank by: /

Remove asterisk

~~++ If action per ACTIONS a.4, a.6, a.7, a.8, or a.9 is taken that permits indefinite operation and the system is placed in recirculation mode, then CORE ALTERATIONS, movement of irradiated fuel in the spent fuel pool, and positive reactivity changes may resume.~~

~~***~~ As the mitigation actions of TS 3.7.5 Action a.5 include the use of the compensatory filtration unit, the unit shall meet the surveillance requirements of TS 4.7.5.b, by manual initiation from outside the control room and TS 4.7.5.c, d and f g.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION PAGE (CLEAN COPY)

(1 page follows)

PLANT SYSTEMS

3/4.7.5 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION (continued)

- b. With the Control Room Emergency Ventilation System inoperable due to an inoperable CRE boundary during MODES 1, 2, 3 or 4, immediately initiate action to implement mitigating actions. Within 24 hours, verify mitigating actions ensure CRE occupant radiological and chemical hazards will not exceed limits and CRE occupants are protected from smoke hazards, and restore CRE boundary to OPERABLE status within 90 days.

With the above requirements not met, be in at least HOT STANDBY within the next 6 hours for one Unit, or 12 hours for both Units, and in COLD SHUTDOWN within the following 30 hours.

With the Control Room Emergency Ventilation System inoperable due to an inoperable CRE boundary during MODES 5, 6 or during the movement of irradiated fuel assemblies, immediately suspend all movement of irradiated fuel.

SURVEILLANCE REQUIREMENTS

4.7.5 The Control Room Emergency Ventilation System shall be demonstrated OPERABLE:

- a. In accordance with the Surveillance Frequency Control Program by verifying that the control room air temperature is less than or equal to 120°F;
- b. In accordance with the Surveillance Frequency Control Program by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes**;
- c. In accordance with the Surveillance Frequency Control Program or (1) after 720 hours of system operation, or (2) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (3) following exposure of the filters to effluents from painting, fire, or chemical release in any ventilation zone communicating with the system that may have an adverse effect on the functional capability of the system, or (4) after complete or partial replacement of a filter bank by:

** As the mitigation actions of TS 3.7.5 Action a.5 include the use of the compensatory filtration unit, the unit shall meet the surveillance requirements of TS 4.7.5.b, by manual initiation from outside the control room and TS 4.7.5.c, d and f.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION BASES PAGES (MARK-UP)
(3 pages follow)

REVISION NO.: 22	PROCEDURE TITLE: TECHNICAL SPECIFICATION BASES CONTROL PROGRAM	PAGE: 174 of 211
PROCEDURE NO.: 0-ADM-536	TURKEY POINT PLANT	

ATTACHMENT 2
Technical Specification Bases
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3/4.7.5 (Continued)

If the unfiltered inleakage of potentially contaminated air past the CRE Boundary and into the CRE can result in CRE occupant radiological dose greater than that calculated in the dose analyses or in inadequate protection of CRE occupants from hazardous chemicals or smoke, the CRE boundary is inoperable. ~~Actions must be taken to restore an OPERABLE CRE Boundary within 90 days when in MODES 1, 2, 3, or 4. During the period that the CRE boundary is considered inoperable in MODES 1, 2, 3, or 4, the operators are required to immediately initiate action to implement mitigating actions to lessen the effect on CRE occupants from the potential hazards of a radiological or chemical event or a challenge from smoke. Actions must be taken within 24 hours to verify that in the event of a DBA, the mitigating actions will ensure that CRE occupant radiological exposures will NOT exceed the calculated dose in the radiological dose consequence analyses, and that CRE occupants are protected from hazardous chemicals and smoke. Previous surveys of offsite and onsite chemicals identified that NO hazardous chemicals present a hazard to Control Room habitability. Thus, the mitigating action for chemical hazards may verify that the chemical hazards analyses are current and require NO toxic gas protection for the CRE occupants. These mitigating actions (i.e., actions that are taken to offset the consequences of the inoperable CRE boundary) should be preplanned for implementation upon entry into the condition, regardless of whether entry is intentional or unintentional. The 24 hour allowable outage time (AOT) is reasonable based on the low probability of a DBA occurring during this time period and the use of mitigating actions. The 90 day AOT is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactors and maintain them in a safe shutdown condition in the event of a DBA. The 90 day AOT is a reasonable time to diagnose, plan and possibly repair, and test most problems with the CRE boundary.~~

Upon determination

during
MODES
1, 2, 3
and 4

Once the effectiveness of the mitigating actions have been verified within 24 hours of CRE boundary inoperability, actions must be taken to restore the CRE boundary to OPERABLE within 90 days.

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3/4.7.5 (Continued)

the following 30

In MODES 1, 2, 3, or 4, if the inoperable CREVS or the CRE Boundary cannot be restored to OPERABLE status within the associated required AOT, the unit must be placed in a MODE that minimizes the accident risk. To achieve this status, the unit must be placed in at least MODE 3 (HOT STANDBY) within 6 hours, and in MODE 5 (COLD SHUTDOWN) within 36 hours. If the inoperability applies to both units simultaneously, be in MODE 3 within 12 hours, and in MODE 5 within 42 hours. The AOTs are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

~~In MODE 5 or 6, with the CREVS inoperable for an inoperable CRE Boundary or for other reasons, action must be taken immediately to suspend all operations that could result in a release of radioactivity that might require isolation of the CRE, such as movement of irradiated fuel.~~

→ This places the unit in a condition that minimizes the accident risk. This does **NOT** preclude the movement of fuel to a safe position. These ACTION requirements apply to both units simultaneously.

Operations that, in the absence of a compensation adjustment, add positive reactivity are acceptable when, combined with other concurrent actions that add negative reactivity, the overall net reactivity addition is zero or negative. For example, a positive reactivity addition caused by temperature increases or decreases is acceptable if it is concurrent with a negative reactivity addition (i.e., boration and/or rod movement, if authorized) such that the overall, net reactivity addition is zero or negative.

Upon determination that the CRE boundary is inoperable in MODES 5, 6, or during the movement of irradiated fuel, all movement of irradiated fuel must be immediately suspended and must remain suspended for the duration of inoperability. Suspending irradiated fuel movement during these operational modes suspends activities that could result in a release of radioactivity that might require isolation of the CRE.

REVISION NO.: 22	PROCEDURE TITLE: TECHNICAL SPECIFICATION BASES CONTROL PROGRAM	PAGE: 176 of 211
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ATTACHMENT 2
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3/4.7.5 (Continued)

f

For
MODES 1,
2, 3 or 4,

Surveillance Requirement (SR) 4.7.5.g verifies the OPERABILITY of the CRE Boundary by testing for unfiltered air leakage past the CRE boundary and into the CRE. It verifies that the unfiltered air leakage into the CRE is **NO** greater than the flow rate assumed in the dose analyses. When unfiltered air leakage is greater than the assumed flow rate, ACTION b must be entered ~~when a unit is in MODES 1-4 and ACTION c must also be entered when a unit is in MODE 5 or 6).~~ ACTION b allows time to restore the CRE boundary to OPERABLE status provided ~~mitigating actions are taken while in MODES 1-4, that ensures~~ that the CRE remains within the licensing basis habitability limits for the occupants following an accident. The details of the testing are specified in the Control Room Envelope Habitability Program.

90 days

immediate action is initiated to implement mitigating actions, and within 24 hours, the mitigating actions are verified to ensure

For MODES 5, 6 or during the movement of irradiated fuel, ACTION b requires the immediate suspension of all irradiated fuel movement and the suspension remains in effect for the duration of CRE boundary inoperability.