



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 26, 2017

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
Florida Power & Light Company
Mail Stop EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 - ISSUANCE OF AMENDMENTS REGARDING TECHNICAL SPECIFICATIONS FOR HIGH-RANGE NOBLE GAS EFFLUENT MONITORS (CAC NOS. MF9071 AND MF9072; EPID L-2016-LLA-0037)

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has issued the enclosed Amendment No. 277 to Renewed Facility Operating License No. DPR-31 and Amendment No. 272 to Renewed Facility Operating License No. DPR-41 for Turkey Point Nuclear Generating Unit Nos. 3 and 4, respectively. The amendments change the Technical Specifications (TSs) in response to the application from Florida Power & Light Company dated December 21, 2016 (L-2016-230).

The amendments revise the TSs by deleting high-range noble gas effluent monitors and relocating the requirements to the Turkey Point Offsite Dose Calculation Manual. The NRC staff's safety evaluation of the amendments is enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Wentzel".

Michael J. Wentzel, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosures:

1. Amendment No. 277 to DPR-31
2. Amendment No. 272 to DPR-41
3. Safety Evaluation

cc w/enclosures: Distribution via Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 277
Renewed License No. DPR-31

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (the licensee) dated December 21, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Renewed Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Renewed Facility Operating License No. DPR-31 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 277 are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Undine Shoop, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed
Facility Operating License
and Technical Specifications

Date of Issuance: October 26, 2017



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT NUCLEAR GENERATING UNIT NO. 4

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 272
Renewed License No. DPR-41

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (the licensee) dated December 21, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

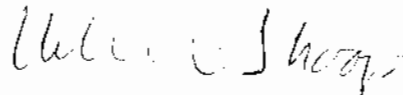
2. Accordingly, the license is amended by changes to the Renewed Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Renewed Facility Operating License No. DPR-41 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 272 are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Undine Shoop, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed
Facility Operating License
and Technical Specifications

Date of Issuance: October 26, 2017

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 277 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 272 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-41

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

Replace page 3 of Renewed Facility Operating License No. DPR-31 with the attached page 3. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Replace page 3 of Renewed Facility Operating License No. DPR-41 with the attached page 3. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Replace the following page of the Appendix A Technical Specifications with the attached page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove
3/4 3-47
3/4 3-50

Insert
3/4 3-47
3/4 3-50

- E. Pursuant to the Act and 10 CFR Parts 40 and 70 to receive, possess, and use at any time 100 milligrams each of any source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactively contaminated apparatus;
 - F. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of Turkey Point Units Nos. 3 and 4.
3. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified below:
- A. Maximum Power Level

The applicant is authorized to operate the facility at reactor core power levels not in excess of 2644 megawatts (thermal).
 - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 277, are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - C. Final Safety Analysis Report

The licensee's Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21(d), as revised on November 1, 2001, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than July 19, 2012.

The Final Safety Analysis Report supplement as revised on November 1, 2001, described above, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4), following the issuance of this renewed license. Until that update is complete, the licensee may make changes to the programs described in such supplement without prior Commission approval, provided that the licensee evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

- E. Pursuant to the Act and 10 CFR Parts 40 and 70 to receive, possess, and use at any time 100 milligrams each of any source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactively contaminated apparatus;
 - F. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of Turkey Point Units Nos. 3 and 4.
3. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified below:
- A. Maximum Power Level

The applicant is authorized to operate the facility at reactor core power levels not in excess of 2644 megawatts (thermal).
 - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 272, are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - C. Final Safety Analysis Report

The licensee's Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21(d), as revised on November 1, 2001, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than April 10, 2013.

The Final Safety Analysis Report supplement as revised on November 1, 2001, described above, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4), following the issuance of this renewed license. Until that update is complete, the licensee may make changes to the programs described in such supplement without prior Commission approval, provided that the licensee evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

TABLE 3.3-5 (Continued)

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLI- CABLE MODES</u>	<u>ACTIONS</u>
14. In Core Thermocouples (Core Exit Thermocouples)	4/core quadrant	2/core quadrant	1, 2, 3	31, 32
15. Containment High Range Area Radiation	2	1	1, 2, 3	34
16. Reactor Vessel Level Monitoring System	2(1)	1(1)	1, 2, 3	37, 38
17. Neutron Flux, Backup NIS (Wide Range)	2	1	1, 2, 3	31, 32
18. DELETED				
19. DELETED				
20. RWST Water Level	2	1	1, 2, 3	31, 32
21. Steam Generator Water Level (Narrow Range)	2/stm. Gen.	1/stm. Gen.	1, 2, 3	31, 32
22. Containment Isolation Valve Position Indication*	1/valve	1/valve	1, 2, 3	39

TABLE NOTATIONS

1. A channel is eight sensors in a probe. A channel is OPERABLE if a minimum of four sensors are OPERABLE.
 2. Inputs to this instrument are from instrument items 3, 4, 5 and 14 of this Table.
- * Applicable for containment isolation valve position indication designated as post-accident monitoring instrumentation (containment isolation valves which receive containment isolation Phase A, Phase B, or containment ventilation isolation signals).

TABLE 4.3-4

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>
1. Containment Pressure (Wide Range)	SFCP	SFCP
2. Containment Pressure (Narrow Range)	SFCP	SFCP
3. Reactor Coolant Outlet Temperature - T _{HOT} (Wide Range)	SFCP	SFCP
4. Reactor Coolant Inlet Temperature - T _{COLD} (Wide Range)	SFCP	SFCP
5. Reactor Coolant Pressure - Wide Range	SFCP	SFCP
6. Pressurizer Water Level	SFCP	SFCP
7. Auxiliary Feedwater Flow Rate	SFCP	SFCP
8. Reactor Coolant System Subcooling Margin Monitor	SFCP	SFCP
9. PORV Position Indicator (Primary Detector)	SFCP	SFCP
10. PORV Block Valve Position Indicator	SFCP	SFCP
11. Safety Valve Position Indicator (Primary Detector)	SFCP	SFCP
12. Containment Water Level (Narrow Range)	SFCP	SFCP
13. Containment Water Level (Wide Range)	SFCP	SFCP
14. In Core Thermocouples (Core Exit Thermocouples)	SFCP	SFCP
15. Containment - High Range Area Radiation Monitor	SFCP	SFCP*
16. Reactor Vessel Level Monitoring System	SFCP	SFCP
17. Neutron Flux, Backup NIS (Wide Range)	SFCP	SFCP
18. DELETED		
19. DELETED		
20. RWST Water Level	SFCP	SFCP
21. Steam Generator Water Level (Narrow Range)	SFCP	SFCP
22. Containment Isolation Valve Position Indication	SFCP	SFCP

*Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.



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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
AMENDMENT NO. 277 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-31
AMENDMENT NO. 272 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-41
FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4
DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By application dated December 21, 2016 (Reference 1), Florida Power & Light Company (the licensee) requested changes to the Technical Specifications (TSs) for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point 3 and 4), which are contained in Appendix A of Renewed Facility Operating License Nos. DPR-31 and DPR-41. The licensee proposed to revise the TSs by relocating the high-range noble gas accident monitoring instrumentation from Tables 3.3-5 and 4.3-4 located in TS Limiting Condition for Operation (LCO) 3.3.3.3 "Accident Monitoring Instrumentation," and Surveillance Requirement (SR) 4.3.3.3, respectively, to the Offsite Dose Calculation Manual (ODCM), a licensee-controlled document.

2.0 REGULATORY EVALUATION

2.1. Description of the Effluent Monitoring Systems

The primary purpose of the Accident Monitoring Instrumentation is to display unit variables that provide information required by the control room operators during accident situations. This information provides the necessary support for the operator to take the manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for Design Basis Accidents. The availability of Accident Monitoring Instrumentation is important so that responses to corrective actions can be observed and any further actions can be determined. Specific to this license amendment request (LAR), the High-Range Noble Gas Effluent Monitors are described below.

There are three high-range noble gas effluent monitors identified in Tables 3.3-5 and 4.3-4 of TS LCO 3.3.3.3 and SR 4.3.3.3: Plant Vent Exhaust (Instrument 19.a), Unit 3 Spent Fuel Pit Exhaust (Instrument 19.b), and Condenser Steam Jet Air Ejectors (Instrument 19.c). These Special Particulate, Iodine and Noble Gas (SPING) monitors are designed to detect radioactive noble gas isotopes passing through their respective exhaust paths and to collect halogens and particulates on filter elements for later analysis.

Monitoring of the Plant Vent Exhaust gaseous radioactive effluents being released to atmosphere is accomplished via the Plant Vent Stack Air Particulate Radiation Monitor, RaD-6304. In addition, the Unit 4 Spent Fuel Pit Vent exhaust is routed through the Plant Vent Exhaust pathway and monitored by RaD-6304.

The Unit 3 Spent Fuel Pit Exhaust is monitored for gaseous radioactive effluents by the Unit 3 Spent Fuel Pit Vent Exhaust Radiation monitor, RaD-3-6418. This SPING monitor detects gaseous radiation passing through the Unit 3 Spent Fuel Pool Vent, which includes exhausts from the Unit 3 Spent Fuel Pit and the Unit 3 Cask Handling Facility areas. The Unit 3 Spent Fuel Pit Vent Exhaust monitor consists of a beta-gamma sensitive Geiger-Mueller tube detector.

The Units 3 and 4 Condenser Steam Jet Air Ejectors are monitored for high-range noble gas activity by Condenser Steam Jet Air Ejector Exhaust Radiation Monitors RaD-3-6417 and RaD-4-6417, respectively. These SPING monitors detect radioactive noble gas isotopes discharged from the Steam Jet Air Ejector, which draws the gases from the condensers.

2.2 Licensee's Proposed Changes

The licensee proposed to delete the following text from TS LCO 3.3.3.3, Table 3.3-5, and SR 4.3.3.3, Table 4.3-4, and then relocate the requirements to the Turkey Point ODCM:

Instrument 19, High Range Noble Gas Effluent Monitors

- a) Plant Vent Exhaust
- b) Unit 3 Spent Fuel Pit Exhaust
- c) Condenser Air Ejectors

The ODCM is a mandated licensing bases document, which is licensee-controlled. The content includes the radioactive effluent controls and radiological environmental monitoring activities for a nuclear power plant. The licensee is required to follow the change control process located in the Administrative Controls TS 6.14, "Offsite Dose Calculation Manual (ODCM)." Licensees are required to review changes to the ODCM per criteria specified in the TS, including evaluation and documentation of changes, as well as periodic submission of the updated ODCM to the NRC.

2.3 Regulatory Review

The NRC staff considered the following regulatory requirements, guidance, and licensing and design-basis information during its review of the proposed changes.

Title 10 of the *Code of Federal Regulations* (10 CFR), Paragraph 50.36(c)(2)(ii) contains the criteria for which a TS LCO of a nuclear reactor must be established. TS inclusion is required for each item meeting one or more of the following criteria:

- (A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

(B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(C) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

On July 22, 1993, the NRC issued a "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (final policy statement) (58 FR 39132). The final policy statement encouraged licensees to implement a voluntary program to update their TSs to be consistent with improved vendor-specific standard technical specifications (STSs) issued by the NRC. In the Final Policy Statement, the NRC developed criteria to determine which of the TS requirements should be retained and which requirements could be relocated to licensee-controlled documents. The four screening criteria contained in the policy statement were subsequently incorporated into the regulations by an amendment to 10 CFR 50.36(c)(2)(ii) (60 FR 36953), identified above. The final policy statement states that LCOs which did not meet any of the above four criteria may be proposed for removal from the TS and relocated to licensee-controlled documents.

Section 50.36a of 10 CFR requires, in part, licensees develop and follow operating procedures for the control of effluents, to keep average annual releases of radioactive material in effluents and their resultant committed effective dose equivalents at small percentages of the dose limits specified in 10 CFR 20.1301, and to establish TSs that require compliance with the public dose limits in 10 CFR 20.1301. In addition, 10 CFR 50.36a provides licensees the flexibility of operations which may temporarily result in effluent releases higher than such small percentages of the dose limits, and expects that the licensee will exert its best efforts to keep levels of radioactive effluent as low as is reasonably achievable (ALARA) (i.e., within the numerical guides established in 10 CFR Part 50, Appendix I).

Paragraph 50.47(b)(9) of 10 CFR establishes an emergency planning standard to provide adequate methods, systems, and equipment to assess and monitor actual or potential offsite consequences of a radiological emergency condition.

Turkey Point 3 and 4 are designed in compliance with the proposed draft General Design Criteria (GDC), published on July 11, 1967. The construction permits for Turkey Point 3 and 4 were issued on April 27, 1967, prior to the issuance in 1971 of the final GDC in Appendix A to 10 CFR Part 50.

Draft GDC 17, "Monitoring Radioactivity Releases (Category B)," requires that means shall be provided for monitoring the containment atmosphere, the facility effluent discharge paths, and the facility environs for radioactivity released from normal operations, from anticipated transients, and from accident conditions.

Draft GDC 18, "Monitoring Fuel and Waste Storage (Category B)," requires that monitoring and alarm instrumentation shall be provided for fuel and waste storage and handling areas for conditions that might contribute to loss of continuity in decay heat removal and to radiation exposures.

Section 20.1101 of 10 CFR requires, in part, that licensees use, to the extent practical, procedures and engineering controls to achieve occupational doses and doses to members of the public that are ALARA.

Section 20.1301 of 10 CFR establishes dose limits for individual members of the public such that total effective dose equivalent does not exceed 100 millirem (mrem) in a year. In addition, 10 CFR 20.1301(e) requires compliance with the U.S. Environmental Protection Agency's dose limits for any member of the public in the general environment, which are contained in Part 190 to Title 40 of the *Code of Federal Regulations* (i.e., 25 mrem to the whole body, 75 mrem to the thyroid, and 25 mrem to any other organ).

Section 20.1302 of 10 CFR establishes requirements for licensees to demonstrate compliance with the dose limits for individual members of the public by performing surveys of radiation levels in, and radioactive materials in effluents released to, unrestricted and controlled areas, as appropriate.

Table 2 in Appendix B to 10 CFR Part 20 establishes concentration limits for airborne and liquid effluents released to the general environment.

NUREG-0737, "Clarification of TMI Action Plan Requirements," Supplement 1. This NUREG clarified the requirements to improve safety at power reactors that were approved by the Commission for implementation following the accident at Three Mile Island Unit 2.

Regulatory Guide (RG) 1.97, Revision 3, "Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," describes a method acceptable to the NRC staff for complying with the Commission's regulations and requirements in NUREG-0737 to provide instrumentation to monitor plant variables and systems during and following an accident in a light-water-cooled nuclear power plant.

NUREG-1431, Revision 4, "Standard Technical Specifications — Westinghouse Plants," LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," contains the improved STSs for Westinghouse Plants, which are similar to the requirements in the Turkey Point TS LCO 3.3.3.3 and SR 4.3.3.3. The Turkey Point TSs are similar in format to an older version of the Westinghouse STSs, NUREG-0452, "Standardized Technical Specifications for Westinghouse PWRs [Pressurized-Water Reactors]."

3.0 TECHNICAL EVALUATION

The staff evaluated the licensee's LAR to determine if the proposed changes are consistent with the guidance, regulations, and plant-specific design and licensing basis information discussed in Section 2.3 of this safety evaluation.

3.1 Non-Accident Monitoring

The TSs for the monitoring and control of radioactive effluents during non-accident operating conditions are specified in TS 6.8.4.f, "Radioactive Effluent Controls Program." TS 6.8.4.f establishes controls for the normal (i.e., non-accident) Radioactive Effluent Controls Program (RECP) sufficient to meet the regulatory requirements identified in 10 CFR Part 20 (i.e., §20.1101, §20.1301, §20.1302, or 10 CFR Part 20, Appendix B), or to 10 CFR 50.36a.

The RECP establishes controls on the operability of the routine gaseous monitoring instrumentation, including the surveillance testing and set-point determinations. The RECP also establishes limitations on radioactivity concentrations in gaseous effluents, establishes monitoring, sampling and analysis of gaseous effluents, limits the dose and dose rates for releases of gaseous effluents, establishes limitations on annual and quarterly doses to members of the public, requires determination of cumulative dose on monthly, quarterly, and annual basis, and establishes requirements on the use of effluent treatment systems to reduce releases of radioactivity. The licensee is not proposing any changes to the RECP.

The high-range noble gas accident monitoring instrumentation controls are specified in Tables 3.3-5 and 4.3-4 of TS LCO 3.3.3.3 and SR 4.3.3.3, respectively. The proposed relocation of high-range noble gas effluent monitors from Tables 3.3-5 and 4.3-4 of TS LCO 3.3.3.3 and SR 4.3.3.3, respectively, to the ODCM will not affect the licensee's ability to meet the regulatory effluent monitoring requirements of 10 CFR 50.36a, because the high-range noble gas effluent monitors do not monitor or control routine radioactive effluents (i.e., during non-accident conditions). Therefore, the proposed changes do not affect the licensee's ability to comply with the regulatory requirements of 10 CFR 50.36a or 10 CFR Part 20 (i.e., §20.1101, §20.1301, §20.1302, Appendix B of Part 20).

3.2 Post-accident Monitoring

Section 7.5.4, "Regulatory Guide 1.97 (Revision 3)," of the Turkey Point 3 and 4 Updated Final Safety Analysis Report (UFSAR), contains the licensee's evaluation against the guidance in RG 1.97 and the resulting classification of Post-Accident Monitoring Instrumentation. The NRC staff reviewed the licensee's tables of parameters for Turkey Point 3 and 4, and sorted the results according to the TS requirements proposed for relocation:

TS 3.3.3.3 Item	Instrument	RG 1.97 Variable	Type	Category
19.a Plant Vent Exhaust	Plant Vent Stack Wide Range Monitor (RaD-6304, Common between units)	Containment Effluent Radioactivity Noble Gas from Identified Release Points	C	2
		Containment Effluent Radio Activity Noble Gas (from Buildings or Areas, etc.)	C	2
		Common Vent – Noble Gases	E	2
		Particulates & Halogens – All Identified Plant Release Points	E	3
19.b Unit 3 Spent Fuel Pit Exhaust	Spent Fuel Pool Vent Monitor (RaD-3-6418, Unit 3 only)	Containment Effluent Radioactivity Noble Gas from Identified Release Points	C	2
		Containment Effluent Radio Activity Noble Gas (from Buildings or Areas, etc.)	C	2
		All Other Identified Release Points	E	2

TS 3.3.3.3 Item	Instrument	RG 1.97 Variable	Type	Category
		Particulates & Halogens – All Identified Plant Release Points	E	3
19.c Condenser Air Ejectors	Condenser Air Ejector Exhaust Monitor (RaD-3-6417, RaD-4-6417)	Reactor Coolant Pressure Boundary Effluent Radioactivity – Noble Gas Effluent from Condenser Air Removal System Exhaust	C	3
		Condenser Air Removal System	E	2

Of the three Instruments proposed for relocation, 19.a, 19.b, and 19.c, none are classified as Type A or Category 1 variables. According to the NUREG-1431 STSs Reviewer’s Note below Table 3.3.3-1, all RG 1.97, Type A instruments and Category 1, non-Type A instruments shall be included in a unit’s TSs. Type A and Category 1 variables are defined in RG 1.97, Revision 3, Section C.1.

The licensee’s LAR to relocate the instrumentation not required in the TSs is in accordance with the guidance in NUREG-1431, as explained above. The NRC staff reviewed the LAR, UFSAR, regulations, and guidance documents, and finds that the proposed change is acceptable because none of the TS LCO 3.3.3.3 and SR 4.3.3.3 Instrument 19 items meet the criteria for inclusion for Post-Accident Monitoring, which make those requirements eligible for relocation to the Turkey Point ODCM.

Furthermore, in its 1993 final policy statement, the NRC encouraged licensees to implement a voluntary program to update their TSs to be consistent with the NRC’s improved vendor-specific STSs. The NRC developed criteria for which TS requirements and operating restrictions should be retained and which requirements could be relocated to licensee-controlled documents. The four screening criteria contained in the 1993 Policy Statement specify which requirements were to be retained in the TSs. The regulations at 10 CFR 50.36(c)(2)(ii) provide these criteria for inclusion in the TSs. In Section 3.2.2 of its LAR, the licensee described its evaluation of the 10 CFR 50.36(c)(2)(ii) criteria for TS inclusion and determined that none of the items in Instrument 19 met any of the four criteria. The NRC staff agrees with the licensee’s assessment of the instruments against these criteria. Therefore, the NRC staff finds it acceptable that TS 3.3.3.3 and SR 4.3.3.3 Instrument 19, High Range Noble Gas Effluent Monitors, be relocated from the TSs to the ODCM because they do not meet the inclusion criteria in 10 CFR 50.36. The proposed changes also allows the Turkey Point TSs to more closely align with the Westinghouse STSs in NUREG-1431.

In addition, the NRC staff reviewed a related license amendment dated June 15, 2012 (ADAMS Accession No. ML12024A104). In this amendment, the NRC approved a similar change for the licensee to relocate the requirements for Turkey Point TS 3.3.3.3 Instrument 19.d, High Range Noble Gas Effluent Monitors, Main Steam Lines (RaD-6426), from TS Tables 3.3-5 and 4.3-4 to the UFSAR. The NRC staff’s Safety Evaluation conclusion noted the retention of monitor RaD-6417 in the TSs, which is Instrument 19.c (currently proposed for relocation to the ODCM). However, as discussed above, only Type A or non-Type A, Category 1 Post-Accident Monitoring variables are required to be maintained in the TSs. The NRC staff determined that the licensee’s current LAR does not conflict with the 2012 amendment because the requirements for RaD-6417 would be retained in Turkey Point’s licensing basis by way of the ODCM.

Finally, the high-range noble gas effluent monitoring instruments are used to meet the 10 CFR 50.47(b)(9) requirement to provide adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition. The licensee's proposal to relocate the high-range noble gas effluent monitors specifications (for Instruments identified as item No. 19 in TS LCO 3.3.3.3, Table 3.3-5 and in SR 4.3.3.3, Table 4.3-4) to the ODCM would not change the design or function or operation of the high-range noble gas effluent monitors. Therefore, the proposed change will not affect the licensee's ability to continue to meet the requirements of 10 CFR 50.47(b)(9).

3.3 Technical Conclusion

The NRC staff reviewed the licensee's request to relocate the requirements for Instrument 19, "High Range Noble Gas Effluent Monitors" (i.e., 19.a Plant Vent Exhaust, 19.b Unit 3 Spent Fuel Pit Exhaust, and 19.c Condenser Air Ejectors), from TS LCO 3.3.3.3, Table 3.3-5 and SR 4.3.3.3, Table 4.3-4 to the ODCM. The NRC staff determined that these monitors do not meet the TS inclusion criteria in 10 CFR 50.36(c)(2)(ii) or guidance in NUREG-1431, STS 3.3.3. The NRC staff also determined that Turkey Point's design complies with Draft GDC 17 and 18, because relocating the requirements to the licensee-controlled licensing bases document would ensure that the monitors' safety functions would continue to be met. Further, the proposed changes would not prevent the licensee's continued compliance with the NRC's regulations at 10 CFR Part 20 (i.e., §20.1101, §20.1301, §20.1302, or 10 CFR 20, Appendix B), 10 CFR 50.36a, and 10 CFR 50.47(b)(9). Although the licensee may modify the ODCM, any changes to the requirements must be made in accordance with the change process described in TS 6.14, which includes submission of an annual report to the NRC. This will allow continued monitoring of the requirements in the ODCM, even though prior NRC approval would not be required. Therefore, the NRC staff finds the relocation of requirements for Instrument 19, High Range Noble Gas Effluent Monitors, from Tables 3.3-5 and 4.3-4 in TS LCO 3.3.3.3 and SR 4.3.3.3, respectively, to the ODCM acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the NRC staff notified the State of Florida official (Ms. Cynthia Becker, M.P.H., Chief of the Bureau of Radiation Control, Florida Department of Health) on September 14, 2017 (Reference 2), of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the use of facility components located within the restricted area as defined in 10 CFR Part 20 or a surveillance requirement. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding, which was published in the *Federal Register* on March 14, 2017 (82 FR 13666), that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

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

7.0 REFERENCES

- 1 Summers, Thomas, Florida Power & Light Company, letter to U.S. Nuclear Regulatory Commission, "License Amendment Request 251, Relocate Select High-Range Noble Gas Effluent Monitors from the Technical Specifications to Licensee-Controlled Documents," dated December 21, 2016 (Agencywide Documents Access and Management System Accession No. ML17012A085).
- 2 Becker, Cindy, Florida Department of Health, email to Wentzel, Michael, U.S. Nuclear Regulatory Commission, "[External_Sender] RE: NRC Notification of State of Florida Regarding Turkey Point 3 and 4 License Amendment – Changes to the Technical Specifications for Effluent Gas Monitors," (Agencywide Documents Access and Management System Accession No. ML17258A051).

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Date: October 26, 2017

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 - ISSUANCE OF AMENDMENTS REGARDING TECHNICAL SPECIFICATIONS FOR HIGH-RANGE NOBLE GAS EFFLUENT MONITORS (CAC NOS. MF9071 AND MF9072; EPID L-2016-LLA-0037) DATED October 26, 2017

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