

NRR-PMDAPem Resource

From: Wentzel, Michael
Sent: Wednesday, August 16, 2017 1:18 PM
To: Guth, Mitch
Cc: Hanek, Olga; Kilby, Gary; Czaya, Paul; Mack, Jarrett
Subject: Request for Additional Information - Turkey Point 3 & 4 LAR-249 (CAC Nos. MF9601 & MF9602)

Mitch,

By application dated April 9, 2017 (Agencywide Documents Access and Management System Accession No. ML17101A637), Florida Power & Light Company (the licensee) submitted License Amendment Request No. 249 for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point). The proposed amendments would revise the Technical Specifications (TSs) to eliminate certain TS reporting requirements, revise an ACTION for the Emergency Core Cooling System (ECCS), and make changes to certain administrative TSs.

The U.S. Nuclear Regulatory Commission's (NRC's) Reactor Systems Branch (SRXB) staff reviewed the application and identified areas where it needs additional information to support its review. The NRC staff's request for additional information (RAI) is provided below. As discussed with Ms. Olga Hanek of your staff on August 16, 2017, the NRC staff requests the licensee to respond to the RAI by September 22, 2017.

Sincerely,

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SRXB RAI 1 - TS 3.5.2 Regarding Isolation Valves 744A/B and 843A/B

Chapter 6.2 Figures in the updated final safety analysis report (UFSAR) for Turkey Point indicate that the residual heat removal (RHR) and safety injection (SI) cold-leg headers each contain two parallel flow paths with a motor-operated isolation valve in each flow path. Those four isolation valves (744A/B and 843A/B) would open on an SI actuation signal. While the proposed TS would add the RHR parallel injection flow paths and SI parallel injection flow paths to ACTION a of TS 3.5.2 limiting the outage time of the associated flow paths to 72 hours, the valves 744A/B and 843A/B are not added to TS 3.5.2, Surveillance Requirement (SR) 4.5.2.a, which specifies the requirements for applicable valves in the ECCS flow paths for determining if the ACTION requirements in ACTION a of TS 3.5.2 are met for a corresponding flow path.

Paragraph 50.36(c)(3) of Title 10 of the *Code of Federal Regulations* requires, in part, establishing SRs to assure that the Limiting Conditions for Operation (LCOs) will be met. Provide a justification for the acceptability of not including valves 744A/B and 843 A/B in TS SR 4.5.2.a.

SRXB RAI 2 - TS 3.5.2 Regarding RCS Hot-Leg leg Recirculation Flow Path

Chapter 6.2.2 of the UFSAR indicates that the RCS hot-leg injection piping configuration contains two parallel injection flow paths with a motor-operated isolation valve in each flow path. The RCS hot-leg injection is required to prevent boric acid precipitation on the fuel cladding from reducing core cooling following a loss-of-coolant accident (LOCA). Those two isolation valves (866A/B) would open during the RCS hot-leg injection mode, and they are included in TS 3.5.2, SR 4.5.2.a, which specifies the requirements for applicable valves to

assure ECCS flow paths to be operable. The LCO and ACTION Requirements (AR) for the hot-leg parallel injection follow paths are not available in TS 3.5.2.

Criterion 3 in Paragraph 50.36(c)(2)(ii) of Title 10 of the *Code of Federal Regulations* requires, in part, a TS LCO for a structure, system, or component that is credited in the design basis transient and/or LOCA analysis. Provide a justification for the adequacy of not including the RCS hot-leg parallel injection follow paths in a TS LCO and AR.

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