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DX 14000, JUNO BEACH, FL 33408



FLORIDA POWER & LIGHT COMPANY

December 29, 1982 L-82-557

Office of Nuclear Reactor Regulation Attention: Mr. Darrell G. Eisenhut, Director Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Unit 3 & 4 Docket No. 50-250-251 Proposed License Amendment <u>NUREG 0737 Technical Specifications</u>

In accordance with 10 CRF 50.90, Florida Power and Light Company submits nerewith three signed originals and forty copies of a request to amend Appendix A of Facility Operating License DPR 31 and 41.

This amendment is submitted in response to Generic Letter No. 82-16 which requested Technical Specifications for items required by NUREG-0737 for implementation by December 31, 1981.

Enclosure 1 to Generic Letter No. 82-16 listed eleven items to be addressed. The item and our position on each follows:

(1) STA Training (1.A.1.1.3)

Turkey Point Technical Specification 6.3.1 adequately addresses this requirement.

(2) Limit Overtime I.A.1.3

Our letter L-82-436, dated October 12, 1982 stated our position on the overtime restrictions of Generic Letter No. 82-12. In that letter we noted that our overtime restrictions are adequately enforced by incorporation in the Administrative Procedures and we believe amending the Technical Specifications is unnecessary based on our history of satisfactory results in this area.

- (3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)
- (4) Safety Grade AFW System Initiation and Flow Initiation (II.E.1.2)

No action is required for items (3) and (4).

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Office of Nuclear Reactor Regulation

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(5) Dedicated Hydrogen Penetrations (II.E.4.1)

Turkey Point Technical Specification 4.4.3 adequately addresses this item.

(6) Containment Pressure Setpoint (II.E.4.2.5)

The existing containment pressure setpoint was approved by the NRC per NUREG-0737 item II.E.4.2.5. Therefore, no action is required.

(7) Containment Purge Valve (II.E.4.2.6)

No action is required for this item.

(8) Radiation Signal on Purge Valves (II.E.4.2.7)

The requirement for the containment purge values to close on high radiation is incorporated as proposed in Attachment 1 in the format of the Turkey Point Technical Specifications.

- (9) Upgrade B & W AFW System (II.K.2.8)
- (10) Not included
- (11) B & W Thermal Mechanical Report (II.K.2.13)

No action is required for items (9), (10), and (11).

(12) <u>Reporting Pressurizer Safety and Relief Valve Failures and Challenges</u> (II.K.3.3.)

Turkey Point Units 3 & 4 is committed to reporting failures of pressurizer power operated relief values or safety values in our annual report. It is our position that control of this item is adequately addressed by administrative procedures and inclusion in the Technical Specifications is unwarranted.

The requirement to incorporate valve failures is described in Attachment 1.

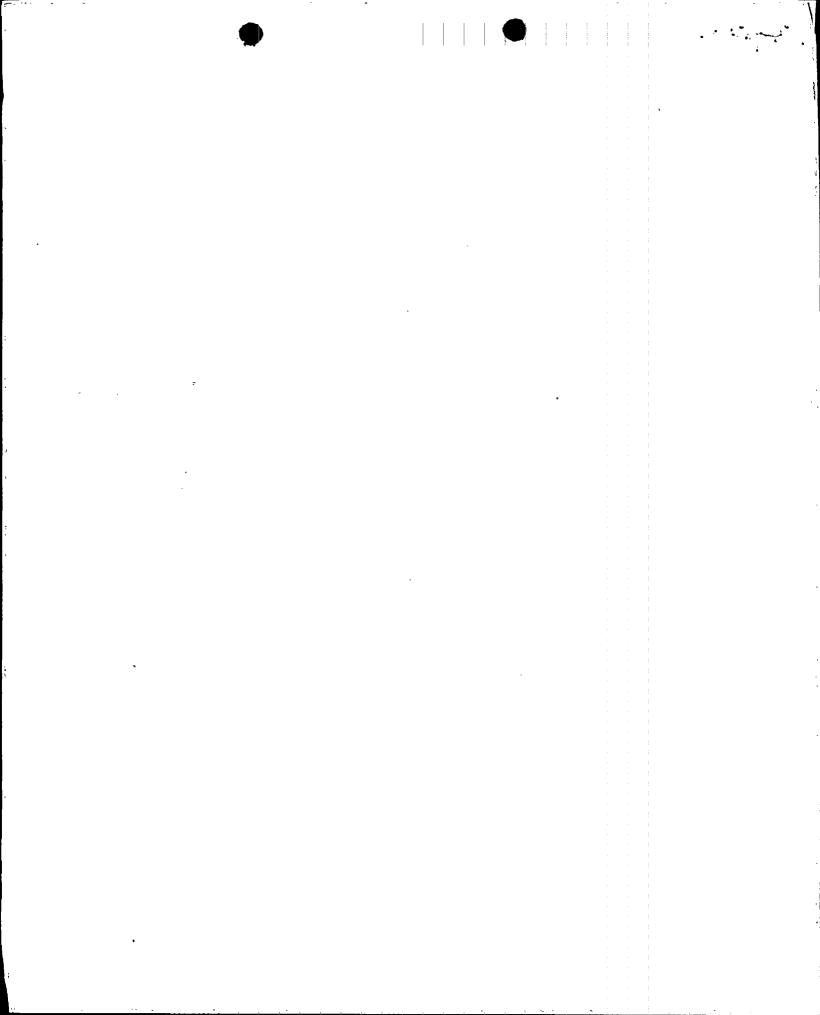
(13) Anticipatory Reactor Trip on Turbine Trip (II.K.3.12)

The operating conditions for the instrumentation is adequately covered in Table 3.5-1.

The surveillance requirements for the Turbine Stop Valves are adequately covered in Table 4.1-2.

The surveillance requirements for the Auto-Stop Oil Pressure switches are added as described in Attachment 1 in the format of the Turkey Point Technical Specifications.

The Turbine Trip has been included as specified in Attachment 1.



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The proposed amendment has been reviewed by the Turkey Point Nuclear Safety Committee and the Florida Power and Light Company Nuclear Review Board.

In accordance with 10 CFR 170.22, it has been determined that this represents a Class I and Class III amendment and a check for payment will follow under separate cover.

Very truly yours,

Whilliam, for

Robert E. Uhrig Vice President Advanced Systems & Technology

REU/JEM/cab

Attachment

cc: J. P. O'Reilly, Region II Harold F. Reis, Esquire

