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 WILLIAMS, J.W. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 THOMPSON, H.L. Division of Licensing (800428-851124)

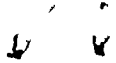
SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising
 Tech Specs re testing requirements for safety-related
 snubbers to define snubber type & deleting test acceptance
 criteria re 50% drag force increase. Fee paid.

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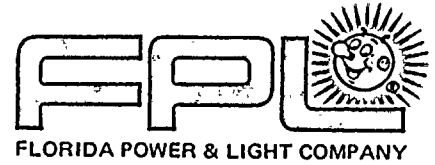


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L-85-407

Office of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thompson:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Proposed License Amendment
Safety-Related Snubbers

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

This amendment is proposed to modify the Technical Specification testing requirements for safety-related snubbers to define snubber type, delete the test acceptance criteria regarding a 50% drag force increase, delete the table of safety-related snubbers, add an additional acceptance criterion for visual inspections, and add a requirement for an engineering evaluation of functional test failures. These proposed changes are based on the existing Technical Specifications. NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors (STS), Revision 5 (Draft) has been used as guidance for format and certain wording changes. FPL has an ongoing program to upgrade the Turkey Point Technical Specifications to incorporate the philosophy and intent of NUREG-0452. Deviations from the STS requirements will be addressed when the upgrade submittal is made.

We are in the process of planning our snubber inspection program for the Unit 4 refueling outage beginning January 4, 1986. The changes requested are necessary for that effort. Therefore we request review and approval of this proposed amendment prior to that date.

The proposed amendment is described below and shown on the accompanying Technical Specification pages.

Page i

The definition of ACTION has been added to the Table of Contents.

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Page v

The Table of Safety Related Snubbers is deleted based on changes discussed below.

Page 1-4

The definition of Action has been added to the Definitions Section of the TS.

Pages 3.13-1, Table 3.13-1 Sheets 1, 2, 3, 3a, 3b, 4, 5, 6, 7

The table of Safety Related Snubbers has been deleted. The limiting condition for operation (LCO) has been revised to be consistent with the format in the WSTS. No action statements or requirements have been added to or deleted from our current TS.

Page 4.14-1

A statement has been added for clarification of the requirements for the snubber surveillance program. The definition for "type of snubber" has been added for clarity. The reference to TS Table 3.13-1 has been deleted for reasons discussed above. This page along with the rest of this section have been revised to be consistent with the format in the WSTS.

Page 4.14-2

The reference to TS Table 3.13-1 has been removed for reasons discussed above. In Section 4.14.1.c, an additional requirement for visual inspection acceptance criteria has been added. This change adds the requirement to verify that the fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. The requirement to include the first snubber supporting main reactor coolant system (RCS) piping downstream of the reactor vessel nozzles has been removed because no snubbers exist on RCS piping and there are no plans to install any snubbers there in the future.

Page 4.14-3

The functional tests section has been split into two sections with the new section being 4.14.1.e, titled "Functional Test Failure Analysis". No current requirements have been deleted from the TS in this new section. An additional requirement of an engineering evaluation for each function test failure to meet the functional test acceptance criteria to determine the cause of the failure is added. This evaluation is currently being done so addition of this requirement to the TS is not adding any new requirements. The reference to TS Table 3.13-1 has been removed for reasons discussed above. The wording that snubbers "support" components has been changed to "attached". This is because snubbers do not support components but are attached to components.

Page 3
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Page 4.14-4

The first requirement in Section 4.14.4.1.f has been revised to be consistent with the wording in the WSTS. The requirement for the 50% drag force has been removed. This is based on vendor's recommendations and consistent with WSTS. The reference to TS Table 3.13-1 has been removed for reasons discussed above.

Page 6-19

In section m, the reference to TS Table 3.13-1 has been replaced with a reference to TS 3.13. This is consistent with changes discussed above.

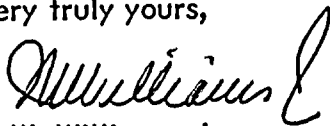
The proposed amendment has been reviewed and approved by the Turkey Point Plant Nuclear Safety Committee and the Florida Power & Light Company Nuclear Review Board.

In accordance with 10 CFR 50.91(b)(1), a copy of the proposed amendment is being forwarded to the State Designee for the State of Florida.

In accordance with 10 CFR 170.12(c), a check for \$150.00 is attached.

Attachment I provides an evaluation of the proposed action in light of the no significant hazards standards contained in 10 CFR 50.91.

Very truly yours,



J. W. Williams, Jr.
Group Vice President
Nuclear Energy

Attachments

JWW/TCG/cab

cc: Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N. W., Suite 2900
Atlanta, GA 30303

Mr. Allan Schubert
Public Health Physicist
Dept. of Health & Rehabilitative Services
1323 Winewood Boulevard
Tallahassee, FL 32301

Harold F. Reis, Esquire

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

J. W. Williams, Jr. being first duly sworn, deposes and says:

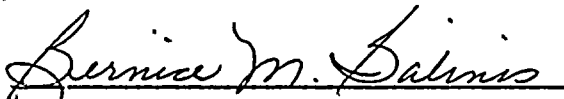
That he is a Group Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.



J. W. Williams, Jr.

Subscribed and sworn to before me this
21 day of November, 1985.



Bernice M. Dalnis

NOTARY-PUBLIC, in and for the County
of Dade, State of Florida

My Commission expires: _____

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP SEPT 18, 1989
BONDED THRU GENERAL INS. UND.

ATTACHMENT I

SAFETY AND NO SIGNIFICANT HAZARDS EVALUATION

The proposed amendment consists of six basic modifications:

A. Definition of Type

The current Technical Specifications require increased inspection (both number of tests and frequency of the testing) based upon the number of test failures. The proposed change makes clear that this increased testing is required for snubbers of the type that are failing the tests.

This change is justified in that there are substantial differences in the functional operation and dynamic response of snubbers to load, which are based on manufacturer and design. These differences are irrespective of capacity. To determine generic manufacturing problem caused failure, snubber sample test increases due to visual and/or functional test failures must be selected based on type, i.e. the same design and manufacturer. This is also true if we wish to determine whether the failure is associated with incorrect application or the failure is related to severe system transients and/or harsh environment.

B. Acceptance Criteria Regarding 50% Drag Force Increase

The current Technical Specifications contain a requirement that testing verify that drag force has not increased more than 50% since the last surveillance test.

Recently, however, Pacific Scientific, our snubber vendor, has issued a clarification on "In-Service" testing of Pacific Scientific shock arrestors. This clarification states that momentary drag forces as high as 5% of rated load for as long as 500 milliseconds are acceptable, as well as average drag loads of 5% of snubber design load. Pacific Scientific has demonstrated in simulated 40 year tests that increases in snubber drag force do not indicate an imminent snubber failure as long as the drag force is within its design range. This requirement is no longer in the WSTS.

In that the acceptance criteria of snubbers is based upon the loadings used in the piping seismic analysis, the consideration of increasing drag force is not an appropriate requirement. Our testing will continue, of course, to verify that snubber loadings fall within the bounds of the seismic analysis.

C. Removal of Safety-Related Snubber Table

This change was recommended by Generic Letter 84-13. There will be no change in the snubbers tested, merely a relocation of the listing from the Technical Specifications to procedures controlled on the plant site.

Therefore, there is no safety consideration involved in this proposed change.

D. Format and Wording Changes

In this amendment the Westinghouse Standard Technical Specifications (WSTS) Revision 5 (Draft) has been used as guidance for format and wording changes to the existing Technical Specification (TS). This has been done to clarify the existing TS to make it easier to understand and use. In the section where WSTS wording was used no current TS requirements were deleted. Therefore, there is no safety consideration involved in this proposed change.

E. Visual Inspection Acceptance Criteria

In this section a third requirement for the acceptance criteria (i.e., verification that fasteners for attachment of the snubber to the component and to the snubber anchorage are secure) was added. This adds an additional limitation, restriction or control not presently included in the TS.

F. Functional Test Failure Analysis Section

This new section was added to separate the analyses that are done for functional test results from the functional test section. No existing requirements were deleted. A requirement for an engineering evaluation for each failure to meet functional test acceptance criteria to determine the cause of the failure has been added. This adds an additional limitation, restriction or control not presently included in the TS.

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences or an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance for the application of the criteria in 10 CFR 50.92 by providing examples of amendments that are considered not likely to involve a significant hazards consideration.

The proposed change met Examples (i), (ii), and (iv) of the Examples of Amendments That Are Considered Not Likely to Involve Significant Hazards Considerations as presented in the Federal Register Notice of April 6, 1983.

Example (i): "A purely administrative change to the Technical Specifications: For example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature."

The removal of the table of safety-related snubbers from the Technical Specifications was done as suggested by Generic Letter 84-13. In that an equivalent list will continue to be maintained on the site, this change meets this Example. Deleting the list of safety-related snubbers will not affect the operability and surveillance requirements of those snubbers. They will still be required to meet the limiting conditions for operation of the units. Changes to the list would be subject to the provision of 10 CFR 50.59.



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The format and wording change in accordance with the WSTS also meet this example.

Example (ii): "A change that institutes an additional limitation restriction or control not presently included in the technical specifications: For example, a more stringent surveillance requirement."

The addition of the definition of type meets this Example in that it provides a more accurate definition used in the snubber test program.

The addition of the third visual acceptance criterion and functional test failure engineering analyses discussed above also meet this example.

Example (iv): "A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met."

The deletion of the acceptance criteria regarding the 50% drag force increase meets this Example, in that Pacific Scientific has only recently (September 1984) provided clarification regarding drag force acceptance criteria. The proposed change does not affect the assumption inputs for the seismic analyses.

Therefore, in that these changes meet the Examples above and pose no threat to the health and safety of the public, we have concluded, in accordance with 10 CFR 50.92, that the proposed changes do not involve a significant hazard in that they do not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.