

September 7, 1988

Docket Nos. 50-250
and 50-251

DISTRIBUTION

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NRC Participants
ACRS (10)
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G. Lainas
S. Varga
B. Wilson, R-II

LICENSEE: Florida Power and Light Company
FACILITY: Turkey Point Units 3 and 4
SUBJECT: SUMMARY OF MEETING HELD WITH FLORIDA POWER AND
LIGHT COMPANY (FP&L) ON AUGUST 30, 1988 REGARDING
ENHANCEMENT OF THE EMERGENCY ELECTRIC POWER SYSTEM
REFERENCE: TAC Numbers 69023 and 69024

A meeting was held in Rockville, Maryland on August 30, 1988 with representa-
tives of Florida Power and Light Company (FP&L) to discuss their plans to
improve the emergency electrical power system at the Turkey Point plant. The
plans included the addition of two, full-size emergency diesel generators and
their associated electrical, mechanical, structural, and operations supporting
equipment.

The licensee intends to complete all work except electrical tie-in under
10 CFR 50.59. This includes site preparation, building construction, and
placement of equipment. Electrical design changes (actual modification of the
operating plant) will receive a Safety Evaluation (SE) from the NRC staff.

FP&L indicated they will consider a special FSAR update when the modifications
are nearly complete. This would be in addition to the usual annual update.
They will advise us of where this milestone fits into the overall plan submitted
on May 27, 1988.

The NRC staff indicated we would need more information about which design codes
and criteria are being used before an SE could be issued. We will issue a
request for information in the next few months. The NRC staff also indicated
we would review the design changes in several technical disciplines, not just
electrical.

An attendance list, meeting agenda and FP&L handouts depicting the plans and
schedule are enclosed.

Original signed by

Gordon E. Edison, Sr. Project Manager
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

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PDR ADDCK 05000250
P PNU

Enclosures: As stated

cc w/enclosures:
See next page

AEJ
LA:PDII-2
DMiller
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AEJ
PM:PDII-2
GEdison:bg
9/2/88

D:RDP-2
HBERKOW
9/2/88

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Florida Power and Light Company

Turkey Point Plant

cc:

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ENCLOSURE 1

ATTENDANCE AT MEETING WITH FP&L ON 8/30/88
TO DISCUSS ENHANCEMENT OF TURKEY POINT ELECTRICAL POWER SYSTEMS

NAME

ORGANIZATION

G. E. Edison	NRC/NRR
L. I. Kennedy	FP&L - JPE Electrical
Daniel Kohler	FP&L - JPE Project Engineer
Chris Baker	FP&L - Project General Manager
Mark Kobi	FP&L - JPE Licensing
Thomas C. Grozan	FP&L - Licensing
Jesus Arias, Jr.	FP&L - PTN
Dominic Tondi	NRC/NRR:DEST:SELB
Herbert Berkow	NRC/NRR
Argil Toalston	NRC/NRR/DEST/SELB

ENCLOSURE 2

FPL/NRC MEETING
EMERGENCY POWER SYSTEM UPGRADE

AUGUST 30, 1988

AGENDA

- o Introduction - T. Grozan

- o Emergency Power System Design Report - M. Kobi
 - 10 CFR 50.59
 - Heavy Loads

- o Testing - M. Kobi
 - EDG Qualification
 - Preoperational Testing

- o Safety Evaluation - M. Kobi

- o Technical Specifications - M. Kobi/J. Arias, Jr.

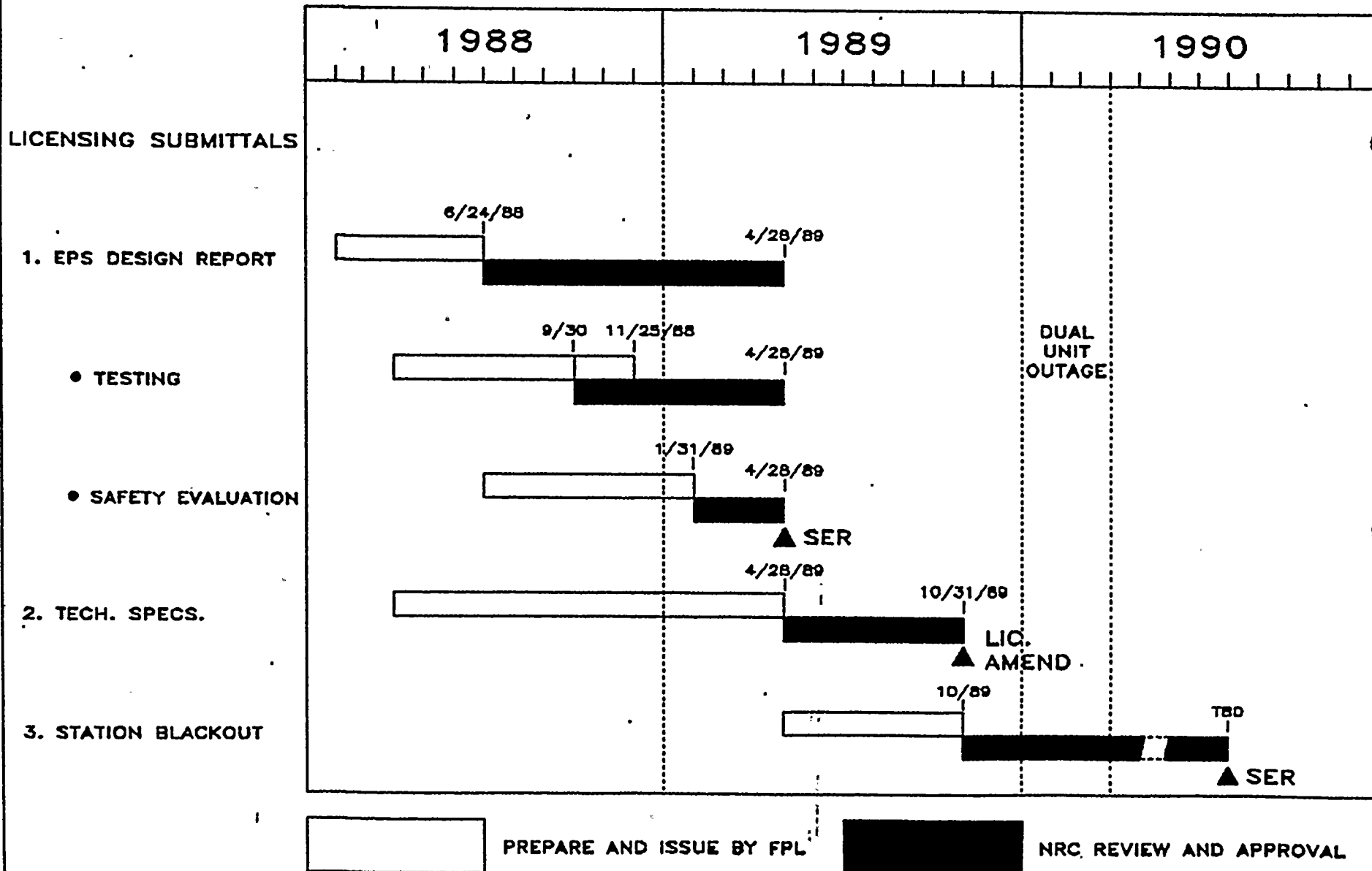
- o Station Blackout - M. Kobi



WORK PLAN OUTLINE

		(Scheduled Issue Date)
<u>Submittal #1</u>	- EPS Enhancement Report. This submittal would contain system design/operating information, a discussion of our proposed implementation plan, and a preliminary power distribution system FMEA	(6/24/88)
o <u>Supplement #1</u>	- Testing - This section would discuss:	
	- EDG Qualification (300 start test as appropriate)	(9/30/88)
	- Preoperational Testing	(11/25/88)
	Factory Production Test for EDG's	
	Field Startup Testing	
	Pre-op and Safeguards Testing	
o <u>Supplement #2</u>	- Safety Evaluation - This section would include:	(1/31/89)
	- Review of FSAR Chapter 14 accidents	
	- Final EPS FMEA results	
	- PRA results	
<u>Submittal #2</u>	- Revised Technical Specifications and No Significant Hazards Evaluation	(4/28/89)
<u>Submittal #3</u>	- Station Blackout - This submittal would contain FPL's position and supporting justification for resolution of station blackout.	(10/89)

EPS ENHANCEMENT PROJECT LICENSING SUBMITTAL SCHEDULE



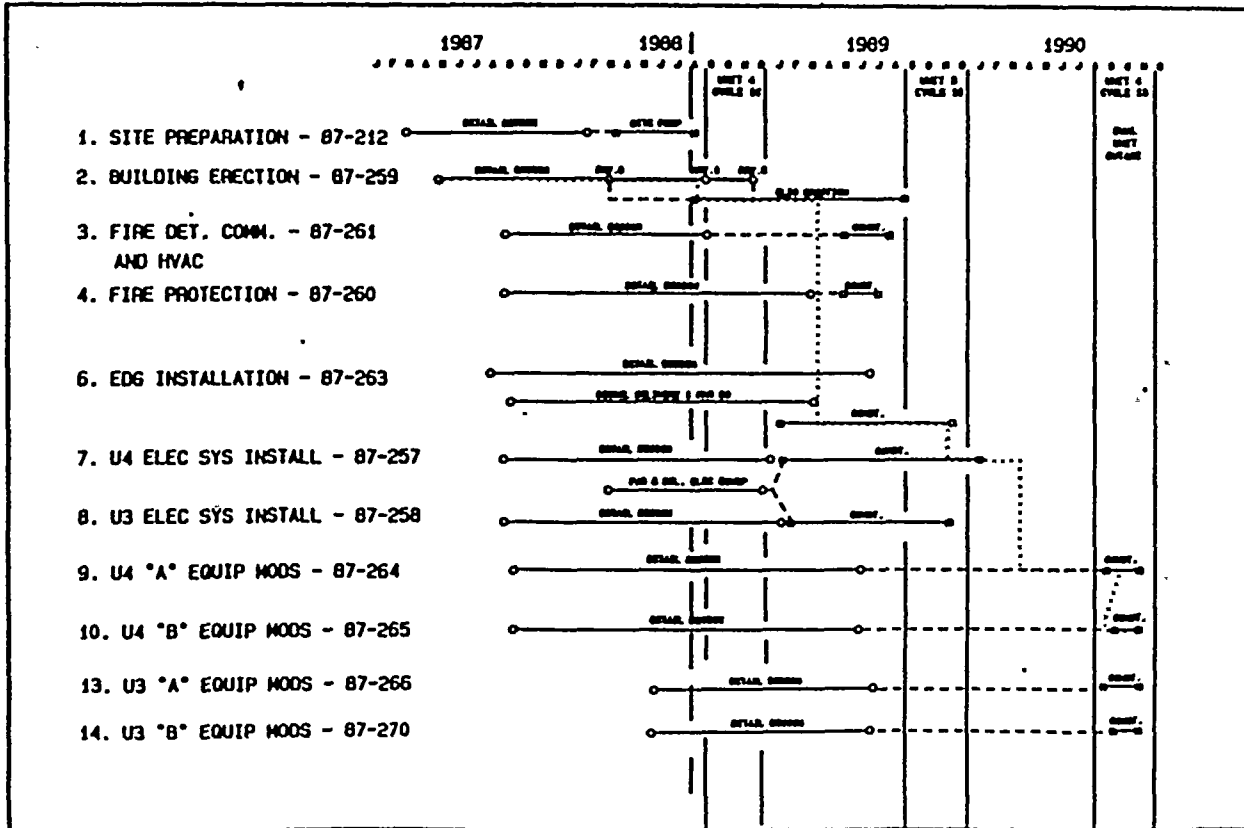


BI 158 EMERGENCY DIESEL GENERATOR ADDITION MILESTONE SCHEDULE TURKEY POINT PLANT

DATA DATE
30 JULY 88

MILESTONES

PC/M ISSUE	TARGET	ACTUAL/ (FORECAST)
87-212	24 FEB 88	22 MAR 88
87-259 SUP.0	05 APR 88	18 JUL 88
87-259 SUP.1	23 SEP 88	06 OCT 88
87-259 SUP.2	14 DEC 88	27 FEB 89
87-261	23 SEP 88	19 OCT 88
87-260	13 MAR 89	05 APR 89
87-263 REV.0	27 JAN 89	13 MAR 89
87-263 REV.1	12 APR 89	
87-263 REV.2	13 JUN 89	
87-257	06 JAN 89	10 APR 89
87-258	06 JAN 89	27 FEB 89
87-264	08 JUN 89	18 MAY 89
87-265	08 JUN 89	18 MAY 89
87-266	08 JUN 89	
87-267	08 JUN 89	



FLORIDA POWER & LIGHT COMPANY
TURKEY POINT UNITS 3 & 4
NEW DIESEL GENERATOR
MILESTONE SCHEDULE

ENCLOSURE 3

August 25, 1988

Docket Nos. 50-250
and 50-251

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Docket File

NRC & Local PDRs

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OGC-Rockville

E. Jordan

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NRC Participants
ACRS (10)
B. Troskoski
G. Lainas

LICENSEE: Florida Power and Light Company

FACILITY: Turkey Point Units 3 and 4

SUBJECT: SUMMARY OF MEETING HELD WITH FLORIDA POWER AND
LIGHT COMPANY (FP&L) ON AUGUST 18, 1988 REGARDING
TECHNICAL SPECIFICATIONS CONVERSION

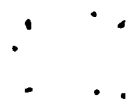
REFERENCE: TAC Numbers 63038 and 63039

A meeting was held in Rockville, Maryland on August 18, 1988 with representatives of Florida Power and Light Company (FP&L) to discuss details of their Technical Specifications Revision Project. This project is a voluntary effort by FP&L to upgrade their approved Technical Specifications (TS) towards Standard TS to the extent practical. An initial proposal was submitted by FP&L to the NRC staff on September 29, 1986, followed by the electrical portion on November 28, 1986, with the expectation that detailed discussions with the staff would result in substantial changes to the proposal, and therefore result in a completely revised submittal for NRC staff review. Previous meetings on this subject were held November 18, 1986, June 17 and 18, 1987, January 9, February 23, and March 28, 1988. This recent meeting focussed on: (1) FP&L's efforts to provide comment on the staff's "Proof and Review" draft of revised TS, (2) the process for resolution of differences that may arise, and (3) the process for completion of the TS revision and issuance of a license amendment.

FP&L indicated that they have formed a special team to increase their effort on the TS Revision Project. The licensee stated they would propose a new plan in early September 1988 for completion of the project. Within a week or two of this meeting, the first portions of their comments on the "Proof and Review" draft will be provided to the NRC staff, and the complete formal submittal will be made by September 23, 1988. Any additional comments related to the technical basis for the revised TS will be incorporated into a "Final Draft" submittal following the proof and review phase. FP&L stated they will not attempt to incorporate into this project any new standard TS that might be developed by the nuclear power industry during the next year or so.

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A meeting agenda, attendance list, and FP&L handout materials from the meeting are enclosed.

Gordon E. Edison, Sr. Project Manager
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Enclosures: As stated

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See next page

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8/25/88

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PM:PDII-2
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8/25/88

D:PDII-2
HBerkow
8/25/88

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CONFIDENTIAL

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SECRET

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FPL/NRC MEETING
AUGUST 18, 1988

AGENDA

1. FPL PROCESS FOR PROOF & REVIEW COMMENTS
2. INFORMATION NEEDED FOR PROOF & REVIEW COMMENTS
 - o LEVEL OF DETAIL FOR COMMENT JUSTIFICATION (EXAMPLES)
 - o FORMAT (MARKUP WITH SEPARATE JUSTIFICATION)
3. RESOLUTION OF COMMENTS
 - o NRC COMMENT RESOLUTION
 - o MEETINGS TO RESOLVE FPL COMMENTS
 - o NRC TECHNICAL SUPPORT AT REVIEW MEETINGS
 - o PROCESS FOR RESOLUTION OF ITEMS THAT CANNOT BE RESOLVED BY WORKING GROUP (FPL/NRC TSCB)
4. INFORMATION NEEDED TO PLAN FOR SUBMITTAL
 - o LEVEL OF DETAIL IN CURRENT SUBMITTAL
 - o DESCRIPTION OF CHANGES
 - o NO SIGNIFICANT HAZARDS EVALUATION

ENCLOSURE 2

ATTENDEES AT MEETING
August 18, 1988

<u>NAME</u>	<u>ORGANIZATION</u>
1. G. E. Edison	NRC/NRR
2. H. N. Berkow	NRC/NRR
3. V. A. Kaminskas	FP&L
4. J. C. Balaguero	FP&L
5. B. P. Burdick	FP&L
6. T. C. Grozan	FP&L
7. J. Arias, Jr.	FP&L
8. C. Moon	NRC/NRR/EOEA/OTSB
9. E. Butcher	NRC/NRR/EOEA/OTSB

*C. Christensen (Region II) participated via telephone.



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INTER-OFFICE CORRESPONDENCE

TO: Distribution
FROM: W. F. Conway
SUBJECT: TURKEY POINT REVISED
TECHNICAL SPECIFICATION PROJECT

LOCATION: JNE/JB
DATE: August 11, 1988
COPIES TO: K. N. Harris
C. O. Woody

The purpose of this letter is to define the program being implemented for completion of the Revised Technical Specification (RTS) project. As discussed in the August 4, 1988 meeting at Turkey Point, two teams have been formed to support this effort. The composition and objectives of each team, as well as the efforts required by other organizations to support these teams, is described below.

To complete the FPL review and ensure completion of the RTS project a team has been established on a full time basis with the following membership:

Project Manager: J. Arias, Jr.
Member: J. C. Balaguero (Plant Technical)
Member: B. P. Burdick (JPE)
Member: V. A. Kaminskis (Plant Operations)
Member: P. L. Pace (JNE)

The objectives of the RTS Team will be to:

1. Resolve FPL internal comments on NRC's Proof and Review document.
2. Brief Executive Oversight Committee on current status prior to September NRC meeting.
3. Identify the objectives for the early September meeting with the NRC.
4. Establish a schedule, by the early part of September, for RTS completion.
5. Review RTS to ensure their consistency with PIN design (technical/accuracy/adequate justification).
7. Issue composite set of FPL Proof and Review comments to the NRC by September 23, 1988. This may include partial issuance of comments as they are completed.
8. Resolve FPL/NRC comments on Proof and Review with the NRC.
9. Prepare submittal of license amendment to NRC. This will include representation at FNSC and CNRB.
10. Make recommendations for implementing the RTS (including training).
11. Monthly meetings (more often if needed) with the Executive Oversight Committee to resolve key issues.

To provide management guidance and direction to this project an Executive Oversight Committee has been established with the following membership:

Chairman:	J. S. Odom
Member:	D. A. Sager (JNE Staff)
Member:	J. E. Cross (Plant Management)
Member:	J. B. Hosmer (JPE)
Member:	J. K. Hays (JNL)
Member:	F. H. Southworth (Plant Technical)

The objectives of the Executive Oversight Committee will be to:

1. Review and approve the RTS Team objectives.
2. Review and disposition the RTS Team's recommendations on key issues.
3. Meet with NRC Management to resolve issues that cannot be resolved through working level negotiations.
4. Provide resources for the RTS effort.
5. Advise senior management of the project status.
6. Provide feedback to the RTS Team on senior level discussions with the NRC as they relate to the RTS project.

This committee will meet as necessary to accomplish these objectives.

In addition to the primary representatives on the RTS Team, additional personnel will be responsible to provide support in certain areas of expertise. These individuals will be contacted by team members regarding the review support required and the methods the team will use to resolve comments in their areas of expertise. These individuals and their assigned areas are as follows:

Nuclear Fuels:	D. C. Poteralski
Quality Assurance:	L. W. Bladow
Fire Protection:	R. W. Kemmer
Instrumentation & Control:	D. J. Tomaszewski
Electrical Maintenance:	M. Wayland
Training:	T. A. Finn
Mechanical Maintenance:	J. C. Strong

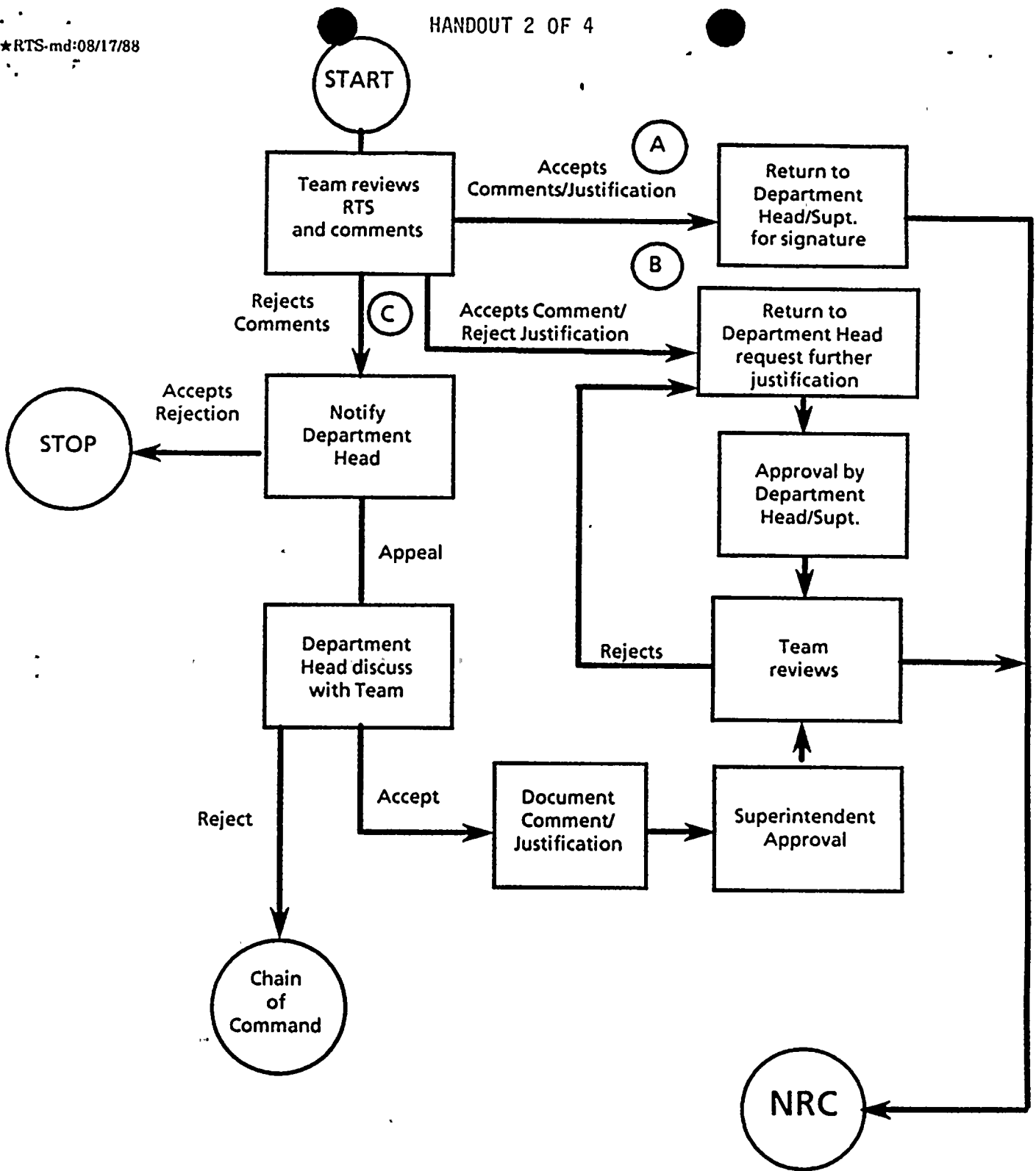
The overall theme of the RTS project is to provide Turkey Point with revised Technical Specifications that are technically accurate and issued in a timely fashion. We have committed to provide FPL's comments on the NRC's Proof and Review version of the Technical Specifications by September 23, 1988. The successful completion of this project will require the dedicated effort of these teams and the involved departments.


W. F. Conway
Senior Vice President - Nuclear

PIN Revised TS Project
Page three

WFC/PLP/gp

Distribution: RTS Team Members
Executive Oversight Committee Members
Support contacts
C. A. Pell
PIN Superintendents
JNE Staff Managers



SAMPLE FORMAT FOR FPL COMMENTS/JUSTIF.

PR

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager - Nuclear shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Plant Supervisor - Nuclear (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Site Vice President - Nuclear Energy shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

XYEABC

6.2.1 An onsite and an offsite organization shall be established for facility operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.) E

SAMPLE COMMENT

- a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to an including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).) #1
- b. The Senior Vice President-Nuclear shall be responsible for overall plant nuclear safety, and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- c. The Plant Manager-Nuclear shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.
- e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the health physics manager shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.) #2

SAMPLE COMMENT

TECH SPEC: 6.2

JUSTIFICATION:

- 1) This is sample justification #1.

- 2) This is sample justification #2.

TYPICAL EXAMPLE

NO SIGNIFICANT HAZARDS EVALUATION

PROPOSED TECHNICAL SPECIFICATION

TITLE: RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION - LOW WATER LEVEL

NO: 3/4.9.8.2

A. DESCRIPTION OF CHANGES

1) Present Condition of License:

As described in the current Turkey Point Unit 3 and 4 Technical Specification in Specification 3.10.7.2, Table 4.1-2 Item 18 and B3.10.7.

2) Proposed Condition of License:

a. The amendment consolidates the current requirements into this specification and explicitly states the LCO, APPLICABLE MODES, ACTION Limits and SURVEILLANCE REQUIREMENTS.

b. The revision is more complete than the current Technical Specification as follows:

The surveillance requirement in the revision specifies verification that RHR loop circulation flow is at least 3000 gpm. The current Technical Specification specifies verification of flow but does not specify a value. The circulation flow which is an alarmed parameter has been exchanged for core outlet temperature which does not alarm in the control room.

c. The revision relaxes the following current requirement:

The frequency of monitoring the RHR cooling system operation has been decreased from every 4 hours to every 12 hours.

B. BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION:

The standards used to arrive at a proposed determination that the changes described above involve no significant hazards consideration are included in 10 CFR 50.92. The regulations state that if operation of the facility in accordance with the proposed amendment would 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, then a no significant hazards determination can be made.

Proposed Tech. Spec. No. 3/4.9.8.2

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve a significant hazards consideration. Example (i) relates to a purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. Example (ii) relates to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications for example, a more stringent surveillance requirement.

- 1) The proposed change as described in Item 2.a is similar to example (i) of 48 FR 14870 in that it is an administrative change which consolidates current requirements into a technical specification format consistent with the Standard Technical Specifications and does not involve technical or plant modifications.
- 2) The proposed change as described in Item 2.b is similar to example (ii) of 48 FR 14870 in that it provides additional information by including the required minimum flow from the RHR cooling loop which is an alarmed parameter.
- 3) The proposed change to relax the time interval for checking RHR loop cooling operability does not involve a significant hazards consideration because this change would not:
 - a) Involve a significant increase in the probability of or consequence of an accident previously evaluated. By exchanging the temperature measurement for the alarmed flow measurement to determine operability of the required RHR loop the probability of losing RHR cooling without being noticed by the operator is less. The low flow alarm will alert the operator to investigate and restore cooling. Increasing the surveillance time interval is justified by the continuous monitor provided by the low flow alarm.
 - b. Create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new mode of plant operation nor involves a physical modification to the plant.
 - c. Involve a significant reduction in a margin of safety because one method of monitoring RHR cooling capability is being exchanged for another and is consistent with industry practice in that it is the same as Standard Technical Specifications.

Proposed Tech. Spec. No. 3/4.9.8.2

Based on the above considerations the changes included in the development of proposed Technical Specification 3/4.9.8.2 are considered not to involve a significant hazards consideration as defined in 10 CFR 50.92. Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.



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