

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
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 THOMPSON, H.R. Division of Licensing

SUBJECT: Forwards revised significant hazards statement & detailed explanation of amends to Licenses DPR-31 & DPR-41 re containment integrity requested in 850128 ltr. Corrected Tech Spec Pages 3.10-1, 3.10-2 & 3.10-4 encl.

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EXTERNAL:	EG&G BRUSKE, S		1	1	LPDR	03	1	1
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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for ensuring the integrity of the financial system and for providing a clear audit trail.

2. The second part of the document outlines the specific procedures that must be followed when recording transactions. This includes the use of standardized forms and the requirement that all entries be supported by appropriate documentation.

3. The third part of the document addresses the issue of data security. It stresses that all financial data must be protected from unauthorized access and that appropriate safeguards must be in place to prevent data loss or corruption.

4. Finally, the document concludes by reiterating the commitment to transparency and accountability. It states that the organization is dedicated to providing accurate and timely information to all stakeholders.

5. The fourth part of the document discusses the role of technology in modern financial systems. It highlights the benefits of automation and the use of advanced software solutions to streamline processes and reduce the risk of human error.

6. The fifth part of the document focuses on the importance of ongoing training and development for staff. It notes that as technology evolves, it is crucial for employees to stay up-to-date on the latest industry trends and best practices.

7. The sixth part of the document addresses the issue of regulatory compliance. It emphasizes that the organization must adhere to all applicable laws and regulations to ensure the legal and ethical operation of its financial activities.

8. The seventh part of the document discusses the importance of effective communication and collaboration between departments. It stresses that clear lines of communication are essential for ensuring that all team members are aligned and working towards the same goals.

9. The eighth part of the document focuses on the importance of risk management. It notes that the organization must proactively identify and assess potential risks to its financial stability and take appropriate measures to mitigate them.

10. The ninth part of the document discusses the importance of maintaining strong relationships with external stakeholders, including suppliers, customers, and regulatory bodies. It emphasizes that open and honest communication is key to building trust and ensuring long-term success.

11. The tenth part of the document concludes by summarizing the key points discussed throughout the document and reiterating the organization's commitment to excellence in financial management.

12. The eleventh part of the document discusses the importance of continuous improvement. It notes that the organization should regularly review its processes and systems to identify areas for optimization and implement changes to enhance efficiency and effectiveness.

13. The twelfth part of the document addresses the issue of ethical conduct. It emphasizes that all employees must adhere to the organization's code of ethics and act with integrity in all of their interactions.

14. The thirteenth part of the document discusses the importance of maintaining accurate and up-to-date information. It stresses that the organization must have a robust system in place to ensure that all data is current and reliable.

15. The fourteenth part of the document focuses on the importance of clear and concise communication. It notes that all reports and documents should be easy to understand and free of unnecessary complexity.

16. The fifteenth part of the document discusses the importance of maintaining a strong focus on customer service. It emphasizes that the organization should strive to provide a high-quality experience for all of its customers.

17. The sixteenth part of the document addresses the issue of data privacy. It notes that the organization must take appropriate measures to protect the personal information of its customers and ensure that it is only used for the purposes for which it was collected.

18. The seventeenth part of the document discusses the importance of maintaining accurate and complete records. It stresses that the organization must have a clear policy in place regarding the retention and disposal of records.

19. The eighteenth part of the document focuses on the importance of maintaining a strong focus on innovation. It notes that the organization should encourage its employees to think creatively and explore new ways of doing things.

20. The nineteenth part of the document discusses the importance of maintaining a strong focus on sustainability. It emphasizes that the organization should consider the environmental and social impacts of its operations and strive to minimize its footprint.

21. The twentieth part of the document concludes by summarizing the key points discussed throughout the document and reiterating the organization's commitment to excellence in financial management.

22. The twenty-first part of the document discusses the importance of maintaining accurate and complete records. It stresses that the organization must have a clear policy in place regarding the retention and disposal of records.

23. The twenty-second part of the document focuses on the importance of maintaining a strong focus on innovation. It notes that the organization should encourage its employees to think creatively and explore new ways of doing things.

24. The twenty-third part of the document discusses the importance of maintaining a strong focus on sustainability. It emphasizes that the organization should consider the environmental and social impacts of its operations and strive to minimize its footprint.

25. The twenty-fourth part of the document concludes by summarizing the key points discussed throughout the document and reiterating the organization's commitment to excellence in financial management.



MAR 28 1985  
L-85-92

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

Dear Mr. Thompson:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendment  
Containment Integrity

Florida Power & Light forwarded a request for license amendment concerning containment integrity in our letter L-85-52, dated January 28, 1985. In response to a request from your staff we have prepared a revised significant hazards statement and a detailed explanation of requested changes. These items are attached.

Also attached are pages 3.10-1, 3.10-2, and 3.10-4. These pages correct typographical errors on our original submittal.

Should you or your staff have any additional questions, please contact us.

Very truly yours,

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

JWW/PLP/js

Attachment

cc: Dr. J. Nelson Grace, Region II  
Harold F. Reis, Esquire

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## ATTACHMENT

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendment  
Containment Integrity

The following discussion is provided to support FPL's conclusion that the changes in our Proposed License Amendment for Containment Integrity dated January 28, 1985 do not represent a significant safety hazard, and that 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.

The examples mentioned with the following items refer to Examples of Amendment That Are Considered Not Likely to Involve Significant Hazards Considerations as published in the Federal Register on April 6, 1983.

### Table 1.1, Definitions 1.8, 1.9, and 1.36. Mode Definitions

The addition of Operational Modes as described in the STS is similar to example ii. These changes add MODE definition to the area between the current hot shutdown and cold shutdown and therefore constitute an additional control not presently included in technical specifications.

### Specification 1.5 Definition of Containment Integrity

This change is made to achieve consistency with proposed specification 3.3.1 and the STS and is therefore an administrative change and similar to example i.

### Specification 3.0 Limiting Conditions for Operation-Applicability

The addition of proposed specification 3.02, 3.03, and 3.04 are changes similar to example ii in that they add additional limitations, restrictions or controls not presently included in the technical specifications.

### Specification 3.3.1 Containment Integrity

The proposed specification is a format change only, except for the footnote. The current specification, 3.3.1.a, requires containment integrity except in cold shutdown as does the proposed specification 3.3.1. Because this portion is a reformatting it is similar to example i. The second portion of the current specification, 3.3.1.b concerns containment integrity with the reactor vessel head removed. In the current specification, containment integrity is required when the vessel head is removed and the reactor is not in refueling shutdown condition (10% subcritical and  $T_{ave} < 160^{\circ}$ ). The 1st note to the Action statement in proposed specification 3.10.8 requires that the reactor be maintained in MODE 6 (10% subcritical and  $T_{ave} \leq 140^{\circ}F$ ) whenever there is fuel in the reactor and the vessel head closure bolts are less than fully tensioned on with the head removed. This proposed specification eliminates the need for the containment integrity requirements of current specification 3.3.1.b as this condition mentioned in the current specification will not be allowed. Because the MODE 6 requirements are stricter and the proposed specification will apply to the case where the vessel head closure bolts are less than fully tensioned, this change constitutes an additional limitation, restriction or control and is similar to example ii.

The exception note to allow for testing of valves is similar to the STS note to Table 3.6-1 (Containment Isolation Valves). This change is being requested in response to a commitment to USNRC, Region II as described in Inspection Reports 250-84-27 and 251-84-28. This change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the opening of those valves under administrative controls could not cause an accident that has been previously evaluated, and because the administrative controls will ensure that the valves are quickly shut, should a previously evaluated accident occur, the consequences of the accident should not be significantly increased. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the opening of the valves under administrative controls cannot cause an accident. This change does not involve a significant reduction in a margin of safety because the administrative controls will ensure the valves and quickly shut in the event they are required.

### Specification 3.3.2 Internal Pressure

This change is made to adopt the Standard Technical Specification (STS) requirements for internal pressure. Because this change adds the requirements in Mode 4 and because it can require eventually going to cold shutdown, it constitutes an additional limitation, restriction or control not presently included in the technical specification and is therefore similar to example ii.

### Specification 3.3.3 Containment Isolation Valves

The LCO of this specification and applicability are changes in format to use the definition of MODES. This portion of the change is purely administrative to achieve consistency throughout the technical specifications and is similar to example i. The Action statement of the proposed specification is added for clarification and operational flexibility in the event of an inoperable containment isolation valve. By adding the STS Action statement, the specifications are made clearer because there is no specified requirements for action required in the current specification, as current specification 3.0.1 does not specifically apply to this LCO. Because this change constitutes an additional limitation, restriction or control not presently included in the technical specifications, it is similar to example ii.

### Specification 3.3.4 Containment Airlocks

This specification is added in the STS format as a new specification. Because it adds an addition limitation, restriction or control not presently included in the technical specifications, this change is similar to example ii.

### Specification 3.4.1 f and g Engineered Safety Features

These specifications are moved from the Engineered Safety Features section to the Refueling section of the specifications as in the STS. This change is an administrative change to achieve consistency throughout the technical specifications and is similar to example i.

### Specification 3.10.1 Containment Building Penetrations

This change is a format change to adopt the STS wording except for the exception note concerning testing of the valves. Because this change places minimum requirements on the securing of the equipment door it constitutes an additional limitation, restriction or control not presently included in the technical specifications and this portion of the change is similar to example ii. The exception to allow opening of valves for testing was discussed above for proposed specification 3.3.1.

### Specification 3.10.2 Containment Ventilation. Isolation System

This change does not alter the current requirements in that the containment ventilation isolation system must be OPERABLE during core alteration This is a format change to achieve consistency of STS format in the technical specifications and is similar to example i.

### Specification 3.10.3 Instrumentation

This change adds the STS action statement including the additional requirement to determine boron concentration. Because this change constitutes an additional limitation, restriction or control not presently included in the technical specifications, it is similar to example ii.



#### Specification 3.10.4 Radiation Monitoring

This change adapts a portion of current specification 3.10.2 to the STS format, and deletes current specification 3.10.3. The deletion of specification 3.10.3 eliminates duplicate, unclear requirements. The monitoring of radiation levels in containment and the spent fuel storage areas are addressed by proposed specifications 3.10.4 and by current specification Table 3.5-3, Table 3.5-4, Table 3.5-5, and Table 3.9-3. The addition of specific action statements from STS 3.3.3.1, Table 3.3-6 adds additional limitation, restriction or controls not presently included and is therefore similar to example ii.

#### Specification 3.10.5 Decay Time

This change adopts the format and wording of the STS without changing the requirements and is a purely administrative change similar to example i.

#### Specification 3.10.6 Communications

This change adopts the format and wording of the STS without changing the requirements and is a purely administrative change similar to example i.

#### Specification 3.10.7 Residual Heat Removal and Coolant Circulation

This change adopts the STS format, moves the requirements from current specification 3.4.1f and g to the Refueling section and includes additional requirements which are more restrictive than the current specification. Because this change constitutes an additional limitation, restriction or control not presently included in the technical specification, it is similar to example ii.

#### Specification 3.10.8 Boron Concentration

This change adopts the STS format and applicable wording, which adds additional requirements concerning action to be taken. Because this change constitutes additional limitations, restrictions or controls not presently included in the technical specification it is similar to example ii.

#### Specification 3.10.9 Crane Travel - Spent Fuel Storage Area

This change adopts the STS format, and is purely administrative in nature. The change is therefore similar to example i.

#### Specification 3.12 Cask Handling

This is purely an administrative change to change a reference which was modified by the change discussed above in proposed specification 3.10.9. Because the change is purely administrative to achieve consistency throughout the technical specification, this change is similar to example i.

EXPLANATION OF REQUESTED CHANGES

Page 3.0-1:

This section is revised to supersede our present 3.0.1, with the STS 3.0.1, 3.0.2 3.0.3 and 3.0.4. Our present 3.0.2 is kept and renumbered to be 3.0.5.

These changes are deemed necessary in order to facilitate our conversion to MODES of operation and subsequent STS format. In addition, these changes offer additional clarification of LCO applicability and action requirements.

Page 3.3-1:

Section 3.3.1: Containment Integrity

This section is modified to reflect STS except for the requested exception to be able to breach containment integrity by opening certain valves and/or airlocks under administrative controls in order to perform surveillance or testing requirements. This exception request is in compliance with a commitment made to NRC Region II Inspector, C. M. Hosey, as described in Inspection Report 250-84-27 and 251-84-28.

Similarly, STS Table 3.6-1 offers the ability of opening certain containment isolation valves on an intermittent basis under administrative control.

Section 3.3.2: Internal Pressure

This section is modified to adopt STS format and add applicability and action statements. The STS action statement for this specification is more conservative than our present one, and it is being adopted in this change.

Section 3.3.3: Containment Isolation Valves

This section is modified to adopt the STS format. The applicability modes are added and the action statements from STS are adopted, which offers further clarification and operational flexibility upon discovery of inoperable containment isolation valves.

Section 3.3.4: Containment Air Locks

This section is adopted as a new specification, which is not presently contained in our specifications. This change is deemed necessary to place restrictions and action statements to be invoked in case of discovering a containment air lock inoperable.

Page 3.4-3

This page is modified to delete the specifications for coolant loops operability in refueling shutdown and transfer them to Section 3.10. This is done in order to organize our Technical Specifications in a more efficient manner.

Section 3.10: Refueling Operations

Section 3.10.1: Containment Building Penetrations

This section is modified to adopt the STS format except for the requested exception, to be able to breach containment integrity by opening certain valves and/or airlocks under administrative controls in order to perform surveillance or testing requirements. This exception request is in compliance with a commitment made to NRC Region II Inspector, C. M. Hosey, as described in Inspection Report 250-84-27 and 251-84-28.

This change also contains the addition of applicability and action statements, which are being adopted from STS.

Section 3.10.2: Containment Ventilation Isolation System

This section is modified to adopt the STS format. Applicability and action statements are also adopted from STS. This change offers operational flexibility and restrictions to be invoked at refueling conditions.

Section 3.10.3: Instrumentation

This section is modified to adopt the STS format. The present specification is not altered, only the addition of applicability and action statements are adopted from STS.

Section 3.10.4: Radiation Monitoring

This section is modified to adopt the STS format. The present specification is not altered, only the addition of applicability and action statements are adopted from STS.

Section 3.10.5: Decay Time

This section is modified to adopt the STS format. The applicability and action statements are included from present Technical Specifications and are in compliance with STS.

Section 3.10.6: Communications

This section is modified to adopt the STS format. The applicability and action statements are included from present Technical Specifications and are in compliance with STS.

Section 3.10.7: RHR and Coolant Circulation

This section is modified to adopt the STS format. Two subsections are presented to further separate specifications for high water and low water levels in the reactor vessel. The applicability and action statements are adopted from STS and are more conservative than our present specifications. This change is deemed necessary to offer operational flexibility and restrictions to be invoked for residual heat removal at refueling conditions.

Section 3.10.8: Boron Concentration

This section is modified to adopt STS format. The specification, applicability and action statements are those in STS, which are more restrictive than our present.

Section 3.10.9: Crane Travel - Spent Fuel Storage Areas

This section is modified to adopt the STS format. The specification, applicability and action statements are from our present Technical Specifications and are identical to STS.

Section 3.12: Cask Handling

This section is modified only to reflect the new reference number to be TS 3.10.9. No format changes are being made.

Section B3.0:

Subsections B3.0.1, B3.0.2, B3.0.3 and B3.0.4 are adopted from STS in order to support the proposed philosophy of MODES of operation. The only change is made in B3.0.1, where the hours are changed to reflect our present LCOs.

Subsection B3.0.5 is a carryover from our present Bases, with no changes.

Section B.3.3.1: Containment Integrity

This section is adopted from STS and was not specifically contained in our present Bases. This proposed change does not represent a deviation from the FSAR.

Section B.3.3.2: Internal Pressure

This section is a carryover from our present Bases, except for a change made to the containment design pressure from 55 psig to 59 psig to be consistent with our FSAR, Section 5.1.1.

Section B.3.3.3: Containment Isolation Valves.

This section is adopted from STS and was not specifically addressed in our current Bases. The GDC numbers were left out and will be included as part of our STS conversion project.

This change does not represent a deviation from the FSAR.

Section B3.3.4: Containment Air Locks

This section is adopted from STS and was specifically addressed in our current Bases. This proposed change does not represent a deviation from the FSAR.

Section B.3.10: Refueling Operations

Section B3.10.1: Containment Building Penetrations

This section is adopted from STS and was not specifically addressed in our current Bases. This change does not represent a deviation from our FSAR.

Section B.3.10.2: Containment Ventilation Isolation

This section is adopted from STS and was not specifically addressed in our current Bases. This change does not represent a deviation from our FSAR. The title of this section is different from STS and is necessary in order to maintain consistency with presently used terminology and documents.

Section B3.10.3: Instrumentation

This section is adopted from STS and was not specifically addressed in our current Bases. This change does not represent a deviation from our FSAR.

Section B3.10.4

This section is included to be consistent with our Technical Specifications format, and is not necessarily covered by STS under Refueling Operations.

Section B3.10.5: Decay Time

Section B3.10.6: Communications

These sections are adopted from STS and our present Bases do contain similar statements to the ones being proposed. These changes do not represent a deviation from our FSAR.

Section B3.10.7: RHR and Coolant Circulation

This section is a carry over from our present Bases and it is addressed in Page B3.1.1a of our Technical Specifications. These Bases are presented in this section to be consistent with our format.

Section B3.10.8: Boron Concentration

This section is adopted from STS and our present Bases do contain similar statements to the ones being proposed. The changes made from STS are values consistent with our FSAR.

Section B3.10.9: Crane Travel - Spent Fuel Storage Areas

This section is a carryover from our present Bases, which is compliance with STS.