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 WOODY, C. D.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Forwards proposed Tech Spec pages changing 860507  
 application for amend' to App A to Licenses DPR-31 & I DPR-41.  
 Revised Tech Spec pages provide individual specifications  
 for auxillary feedwater sys & condensate storage tank.

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THE UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D. C.  
OFFICE OF THE ASSISTANT SECRETARY  
LAND ACQUISITION  
WASHINGTON, D. C.

TO THE SECRETARY OF THE INTERIOR  
FROM THE ASSISTANT SECRETARY  
LAND ACQUISITION  
WASHINGTON, D. C.

RE: [Illegible text]

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| 1900 | [Illegible] | 1     | 1       | 1        | 1     | 1      | 1     |
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FEBRUARY 20 1987  
L-87-79

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendment  
Auxiliary Feedwater System


By letter dated May 7, 1986 (L-86-193), Florida Power & Light Company (FPL) submitted a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 to provide individual specifications for the auxiliary feedwater (AFW) system and condensate storage tank, and to correct errors in valve numbers in Table 3.16-1.

As a result of discussions with the NRC Staff, we are amending our request to require that the third AFW pump be operable for single and two unit operation to provide additional assurance of AFW system availability, and to specify requirements for AFW system operation when both AFW trains are inoperable. In addition, Note 3 on Table 3.18.1 was deleted. Action Statement 1, page 3.18-1, specifies the action required for the situation that was addressed by the note.

Revised technical specifications pages, and a revised safety and no significant hazards determination evaluation to reflect the above changes are attached. They supersede the same pages previously submitted. These changes have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

If you have any questions regarding these proposed changes, please call us.

Very truly yours,

  
C. O. Woody  
Group Vice President  
Nuclear Energy

COW/TCG/gp

Attachments

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant  
Mr. Lyle Jerrett, Florida Dept. of Health and Rehabilitative Services

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ATTACHMENT I

## SAFETY AND NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Description of Amendment Request:Page 3.8-1

The proposed amendment would delete the Specifications for the Auxiliary Feedwater (AFW) System and the Condensate Storage Tank (CST) in current Technical Specification 3.8, Steam and Power Conversion Systems. Requirements for the AFW System and CST will be included in new Technical Specifications 3.18 and 3.19.

Pages 3.18-1, 3.18-2, 3.19-1

The proposed amendment would add Technical Specification 3.18, Auxiliary Feedwater System, and 3.19, Condensate Storage Tank. These proposed Specifications provide explicit limiting conditions for operation (LCO), applicability requirements, and ACTION requirements for operation of the AFW System and CST. The format (i.e., LCO, applicability, action requirements) is that of NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors (WSTS), although the requirements in the proposed Specifications differ from the WSTS because of the uniqueness of the Turkey Point Plant AFW System design (i.e., shared system, three turbine driven pumps, etc.).

Proposed Specification 3.18 would differ from the current Technical Specification 3.8 as follows:

- 1) Table 3.18-1 defines the number of independent auxiliary feedwater pumps and their associated flowpaths (steam and water) required to be operable for single and two unit operation.
- 2) The proposed Specification (LCO) requires that the three turbine driven AFW pumps be operable for single and two unit operation. A single AFW pump is sized to provide adequate flow to satisfy the minimum AFW flow requirements for two unit operation. A recent Westinghouse reanalysis of the Loss of Non-Emergency AC Power to the Plant Auxiliaries event is attached. A second operable pump would satisfy the single active failure criterion. The requirement to have the third AFW pump operable would further ensure the availability of the AFW system should it be required to operate. The proposed Specification (LCO) is consistent with the current design basis and safety analyses, would permit additional operational flexibility (reducing heatup/cool-down transients on the units), and is consistent with 10 CFR 50.36(c)(2) which states that LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility.
- 3) The applicability of the proposed AFW specification is Modes 1, 2, 3, as defined in the Technical Specifications. This change differs from the current requirements in that the action requirements are applicable in all specified modes, whereas, under the current Technical Specification action is only specified to be taken when a limiting condition is not met during power operation, although the AFW System is required to be operable when the reactor coolant temperature is above 350°F. Modes for AFW operation are not specified in the current Technical Specifications.
- 4) The ACTION requirements in the proposed AFW Specification are consistent with the current Specification except for the following. The proposed Specification would allow one train to be inoperable in both units for a 72 hour period vs. the 12 hours now allowed, since the AFW System will provide the minimum required flow through the remaining operable train. In the event both AFW trains become inoperable the proposed specification would require that at least one AFW train be restored to an operable status within 2 hours. If neither train can be repaired the availability of both non-safety standby feedwater pumps (to have a higher degree of confidence in their operation) would be verified, and the unit(s) then placed in HOT SHUTDOWN within the following 12 hours.

MEMORANDUM FOR THE DIRECTOR, FBI

DATE: 10/15/54

TO: SAC, NEW YORK

RE: [Illegible]

100-100000-1000

[Illegible text]

[Illegible text]

Very truly yours,

[Illegible text]

If both standby feedwater pumps are not available, the unit(s) would be kept in a stable condition (thus avoiding possible challenges to the AFW system), and corrective action initiated to restore at least one AFW train (the preferred source of AFW) to an OPERABLE status as soon as possible. This action is consistent with the requirements in the WSTS.

As noted above in 2) the third AFW pump is required to be operable for both single and two unit operation to provide additional assurance of AFW system availability. Because two AFW pumps satisfy the functional requirements for safe operation of the facility, the proposed specification allows one (of three) AFW pumps to remain out of service to 30 days provided two independent AFW trains are OPERABLE, and also allows mode changes with one AFW pump inoperable, provided the 30 day allowed outage time is not exceeded.

Proposed Specification 3.19 would differ from the current Technical Specification 3.8 as follows:

- 1) The proposed ACTION requirements are more restrictive in that they require action to be taken within 4 hours (consistent with the WSTS) as opposed to 48 hours in the current Specification.

#### Page 4.22-1

The proposed amendment would add Technical Specification 4.22, Condensate Storage Tank. This specification provides a surveillance requirement to demonstrate the CST operable by verifying at least once per 12 hours that the water volume in the CST is within its limits when the CST is the supply source for the AFW pumps. There is no similar requirement in the current Specifications.

#### Pages B3.8-1, B3.18-1, B3.19-1

The proposed amendment would add separate bases (B3.18 and B3.19) for the AFW system and the CST. The Bases for the Steam and Power Conversion Systems, B3.8, would be modified accordingly to delete reference to the AFW System and CST.

#### Page 3.16-2

In Table 3.16-1, the valve numbers for HHSI Loop C Cold Leg and RHR Loop B Cold Leg shown as 3-875B and 3-876A would be corrected to read 3-875C and 3-876B, respectively, to reflect the correct valve numbers.

#### **Basis for No Significant Hazards Consideration Determination:**

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 the 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 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.

Operation of Turkey Point Units 3 and 4 in accordance with the proposed amendments would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The first part of the report discusses the general situation of the project and the progress made during the period covered by the report. It also mentions the various meetings and discussions held with the staff and the results of these discussions.

The second part of the report deals with the specific tasks assigned to the staff and the progress made in carrying out these tasks. It also mentions the various difficulties encountered and the measures taken to overcome them.

The third part of the report discusses the financial aspects of the project and the results of the financial statements for the period covered by the report.

The fourth part of the report discusses the administrative aspects of the project and the results of the administrative work for the period covered by the report.

Conclusion

In conclusion, it can be said that the project has made significant progress during the period covered by the report. The various tasks assigned to the staff have been carried out satisfactorily and the financial and administrative aspects of the project have also been handled well.

Appendix

The appendix contains the various documents and reports referred to in the main text of the report. These documents include the financial statements, the administrative reports, and the various correspondence.

References

The references listed in this section are the various books, articles, and reports consulted during the preparation of the report. These references provide a basis for the information presented in the report.

The following is a list of the references consulted during the preparation of the report:

- 1. "The History of the Project", by John Doe, 1965.
- 2. "Financial Management in Organizations", by Jane Smith, 1967.
- 3. "Administrative Procedures and Practices", by Robert Brown, 1968.
- 4. "The Role of the Project Manager", by Mary White, 1969.
- 5. "The Importance of Communication in Organizations", by David Black, 1970.

The above list is not intended to be exhaustive and other references may have been consulted during the preparation of the report.

The report was prepared by the staff of the project and is intended to provide a comprehensive overview of the project's progress during the period covered by the report.

The report is the property of the project and should not be distributed outside the project without the permission of the project manager.



Technical Specification 3.18 and Table 3.18.1 define the number of independent AFW pumps and their associated flowpaths (steam and water) required to be operable for single and two unit operation. Operation of the system in accordance with this Specification would ensure that adequate core and RCP heat removal is available to prevent water relief out the pressurizer relief for safety valves. This is the basis for the current Technical Specification and consistent with the FSAR safety analyses.

The requirements in Technical Specification 3.18 for operation with both AFW trains inoperable avoid challenges to the AFW system by keeping the operating unit(s) in a stable (non-transient) condition until such time that AFW system operation can be restored, or the unit(s) can be safely shutdown using an alternate non-safety grade source of feedwater (the standby feedwater pumps).

Since two AFW pumps satisfy the functional requirements for safe operation of the facility, allowing one (of three) AFW pumps to remain out of service for 30 days provided two independent AFW trains are OPERABLE, and allowing mode changes with one AFW pump inoperable, provided the 30 day allowed outage time is not exceeded, would also not involve a significant increase in the probability or consequences of an accident previously evaluated.

The requirements for CST operation in proposed Technical Specification 3.19 are as restrictive or more restrictive than the requirements in current Technical Specification 3.8.

The addition of Specification 4.22 to verify operability of the CSTs further ensures that the limiting conditions for operation for the CSTs will be met.

The changes to Table 3.16-1 would correct valve designations. No changes to the systems were made.

Based on the above, operation in accordance with the proposed changes would not involve an increase in the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

The operation of the AFW System and CSTs is not significantly different from that allowed by the current Technical Specifications, and since the conclusions of the safety analyses remain valid (i.e., adequate core and reactor coolant pump heat removal is available), operation in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) Involve a significant reduction in a margin of safety.

As noted in response to (1) and (2) above, the operation of the AFW System and CSTs as permitted by the proposed Technical Specification is not significantly different from that allowed by the current Technical Specifications. Adequate heat removal capability is available to remove core and RCP heat and to prevent water relief out the pressurizer relief or safety valves, insuring that the integrity of the core and RCS is not compromised. By allowing continued operation with both AFW trains



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. The text also mentions the need for regular reviews and updates to the records to reflect any changes in the data.

**Financial Reporting Procedures**

The second part of the document outlines the specific procedures for financial reporting. It details the steps involved in collecting data, performing calculations, and generating reports. The text highlights the importance of consistency in the reporting process to ensure that the information is reliable and comparable over time. It also discusses the role of management in reviewing and approving the reports before they are distributed to stakeholders.

**Internal Control Systems**

The final part of the document focuses on internal control systems. It explains how these systems are designed to prevent errors and fraud, and to ensure that the organization's resources are used efficiently. The text describes various control mechanisms, such as segregation of duties and regular reconciliations, and provides examples of how they are implemented in practice. It concludes by stating that a strong internal control system is a key factor in the success of any organization.

inoperable, challenges to the AFW system are avoided until AFW system operation can be restored or the unit(s) can be safely shutdown using an alternate source. Also, the addition of CST surveillance requirements further ensures that the LCO for the CSTs will be met. Thus, operation in accordance with the proposed changes will not involve a significant reduction in a margin of safety.

Based on the above discussion, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety.

Therefore, operation of the facility in accordance with the proposed amendment would pose no threat to the public health and safety, and would not involve a significant hazards consideration.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for the company's financial health and for providing reliable information to stakeholders.

2. The second part of the document outlines the specific procedures for recording transactions. It details the steps from initial entry to final review, ensuring that all necessary information is captured and verified.

3. The third part of the document addresses the role of the accounting department in this process. It highlights the need for clear communication and collaboration between different departments to ensure the accuracy and completeness of the records.

4. The fourth part of the document discusses the importance of regular audits and reviews. It explains how these activities help to identify any discrepancies or errors and ensure that the records are up-to-date and accurate.

5. The fifth part of the document provides a summary of the key points discussed and offers some final thoughts on the importance of maintaining accurate records. It concludes by stating that this is a fundamental aspect of good business practice and one that should be given the highest priority.