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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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FPL

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/cooldown 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.

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.

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 Specificaion 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

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.