

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION

Marked-up Technical Specification Table 4.4-5

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TABLE 4.4-5

REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - WITHDRAWAL SCHEDULE

UNIT 3

<u>CAPSULE NUMBER</u>	<u>VESSEL LOCATION</u>	<u>LEAD FACTOR</u>	<u>WITHDRAWAL TIME</u>
U	30°	0.49	Standby
V	--	---	Specimen withdrawn at 12 years
W	40°	0.34	Standby
X	<del>50°</del> 270°	<del>0.34</del> 2.48	33 years
Y	150°	0.49	Standby
Z	230°	0.34	Standby

UNIT 4

<u>CAPSULE NUMBER</u>	<u>VESSEL LOCATION</u>	<u>LEAD FACTOR</u>	<u>WITHDRAWAL TIME</u>
U	30°	0.49	Standby
V	290°	0.79	24 years
W	40°	0.34	Standby
X	<del>50°</del> 270°	<del>0.34</del> 2.48	Standby
Y	150°	0.49	Standby
Z	230°	0.34	Standby

ATTACHMENT 2

SAFETY EVALUATION

Introduction

10 CFR 50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements", requires that reactor vessels constructed of ferritic materials have their beltline regions monitored by a surveillance program complying with ASTM E 185, "Standard Practice for Conducting Surveillance Tests for Light-Water Cooled Nuclear Power Reactor Vessels," and that the requirements of ASTM E 185-82 be met, to the extent practicable, for capsules withdrawn after July 26, 1983.

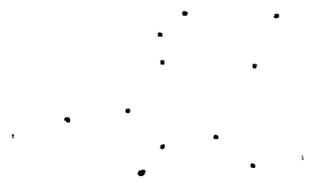
This proposed amendment revises Technical Specification Table 4.4-5 to allow FPL to move surveillance capsule X from the 50' vessel location to the 270' vessel location. This capsule move is requested in order to place it in a higher flux position.

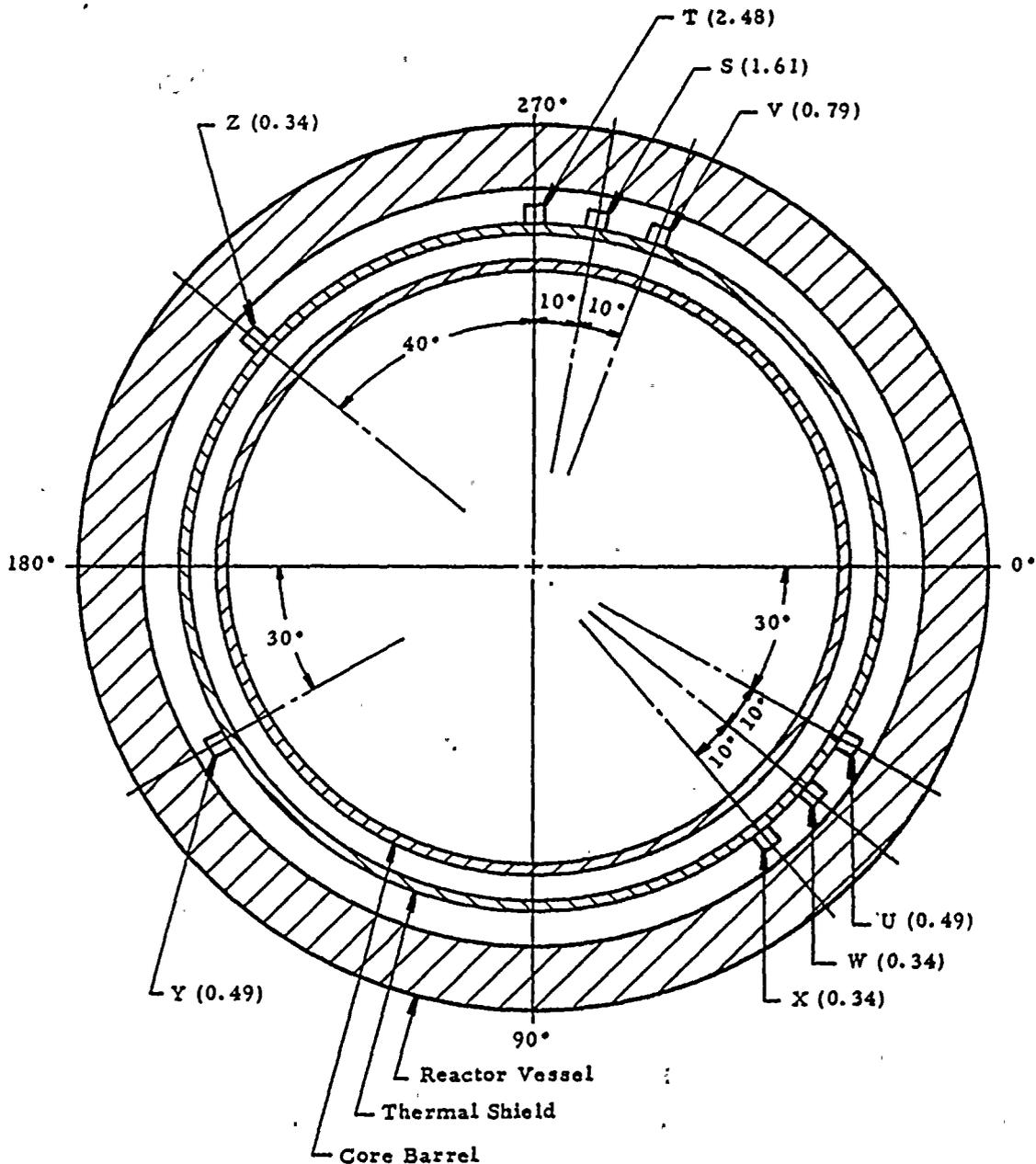
Evaluation

The X capsule currently has a "lead" factor of 0.34 based on its placement in the Unit 3 and 4 reactor vessels (see figure 1). The lead factor is determined by the ratio of the neutron fluence at the surveillance capsule to the neutron fluence at the reactor vessel inside surface. The 270' vessel position, formerly occupied by capsule T (removed from the Unit 3 and 4 reactor vessels in 1974 and 1975, respectively), has a lead factor of 2.48. By moving surveillance capsule X to the surveillance capsule T position, it would accumulate fluence at a much greater rate than the reactor vessel.

The placement of surveillance capsule X in a higher flux position would enhance our capabilities to predict the end of life reactor vessel properties, and conform to the recommendations of ASTM E 185-82 regarding accumulated neutron fluence for an end of life capsule. Capsule X is scheduled to be removed from the Unit 3 reactor vessel after 33 years of operation. The Unit 4 capsule X is a standby capsule.

The NRC staff in their safety evaluation of the Turkey Point reactor vessel surveillance program of the Unit 3 capsule V, dated October 30, 1987, recommended that surveillance capsule X be moved to a higher flux location.





Note: Numbers in parentheses indicate lead factors for the vessel I. D.

FIGURE 1. ARRANGEMENT OF SURVEILLANCE CAPSULES IN THE TURKEY POINT UNITS 3 and 4 PRESSURE VESSELS

ATTACHMENT 3

BASIS FOR A NO SIGNIFICANT HAZARDS 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 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 of an accident previously evaluated; (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.

FPL has determined that operation in accordance with the proposed amendment would not:

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

The movement of surveillance capsule X from its current position to the position formerly occupied by surveillance capsule T would not affect operation of any plant safety equipment or affect the results of previous accident analyses. The current position was established when the reactor vessel surveillance program was developed during the initial licensing of the plant. Title 10 CFR 50, Appendix H now requires that ASTM E 185-82 be met, to the extent practicable, for capsules withdrawn after July 26, 1983. The revised position of capsule X would conform to the recommendations of ASTM E 185-82 regarding accumulated fluence for an end of life capsule and would enhance our capabilities to predict the end of life reactor vessel properties. No changes to the previously approved withdrawal schedules are proposed.

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

Since plant design allows for the placement of surveillance capsule X in the former surveillance capsule T position, the operability of plant systems, structures, or components is not affected. The proposed change does not result in any physical change to the plant or method of operating the plant from that allowed by the Technical Specifications. No new failure modes have been defined for any system or component nor has any new limiting single failure been identified.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously analyzed.

- (3) involve a significant reduction in a margin of safety.

By moving surveillance capsule X from its current position to the proposed position the neutron fluence it accumulates would lead the reactor vessel. The capsule in this new location would enhance our capabilities to predict the end of life reactor vessel material properties. Also, this location change is in accordance with the recommendations provided in ASTM E 195-82, as required by 10 CFR 50, Appendix H. The proposed change has no impact on the safety analyses presented in the Turkey Point FSAR therefore, it does not involve a reduction in a margin of safety.

Based on the above, FPL has determined that the proposed amendment request does not: (1) involve a significant 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, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazards consideration.



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