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 GOLDBERG, J.H. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Provides rev to 950330 request for amends to licenses DPR-31 & DPR-41 re TS SR 4.8.1.1.2.g.7.

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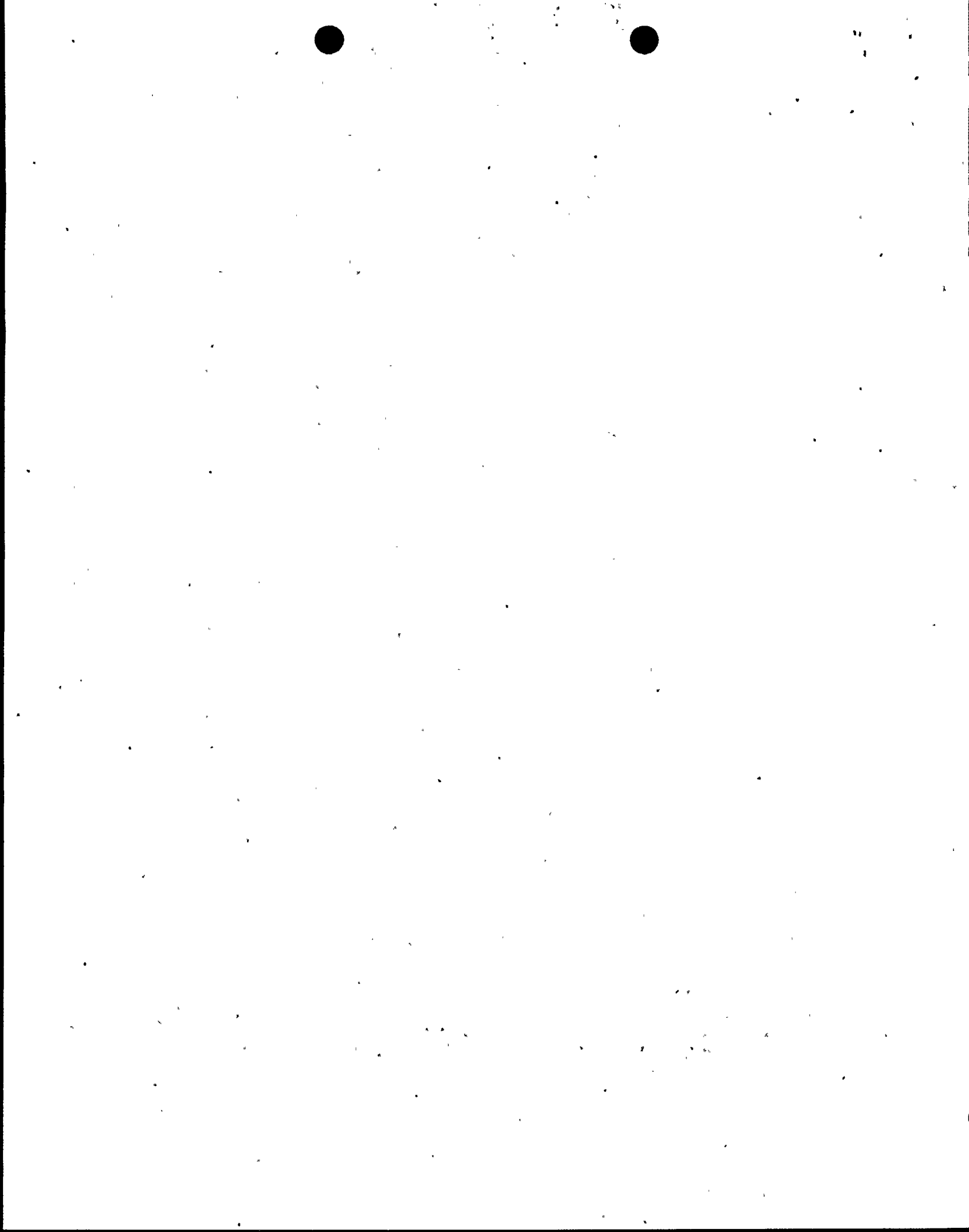
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FPL

JUN 19 1995

L-95-163
10 CFR \$50.36
10 CFR \$50.90

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 Amendments - Revision
Periodic Testing of Emergency Diesel Generators
(TAC Nos. M91911 /M91912)

By letters L-95-81, dated March 30, 1995, as revised by letter L-95-141, dated May 5, 1995, Florida Power and Light Company (FPL) requested that Appendix A of Facility Operating Licenses DPR - 31 and DPR - 41 be amended to revise Turkey Point Units 3 and 4 Technical Specification (TS) Surveillance Requirement 4.8.1.1.2.g.7), Emergency Diesel Generator (EDG) loss of offsite power (LOOP) load acceptance hot start test within 5 minutes of the 24-hour EDG test run.

Subsequent to our May 5, 1995 letter, and as a result of proposed license amendments review comments by the NRC staff, FPL has revised Attachment 1, "Description of Amendments" and Attachment 3, "Proposed Technical Specifications".

FPL has concluded that the proposed license amendments' revisions do not alter the original conclusion, rendered in Attachment 2 to letter L-95-81, that no significant hazards considerations exist pursuant to 10 CFR \$50.92.

In accordance with 10 CFR \$50.91(b) (1), a copy of these proposed license amendments' revisions are being forwarded to the State Designee for the State of Florida. The proposed revisions have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions, please contact us.

Very truly yours,

J. H. Goldberg
President
Nuclear Division

Attachments

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant
W. A. Passetti, Florida Department of Health and Rehabilitative Services

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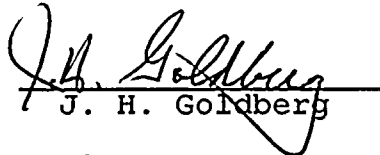
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STATE OF FLORIDA)
) ss.
COUNTY OF PALM BEACH)

J. H. Goldberg being first duly sworn, deposes and says:

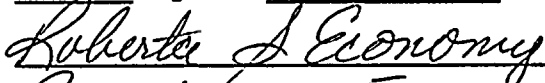
That he is President, Nuclear Division, of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.


J. H. Goldberg

Subscribed and sworn to before me this

19 day of June, 1995.



Roberta S. Economy
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of Palm Beach, State of Florida

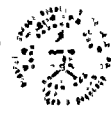
My Commission expires 6-1-97
Commission No. CC 283823

J. H. Goldberg is personally known to me.



ROBERTA S. ECONOMY
MY COMMISSION # CC283823 EXPIRES
June 1, 1997
BONDED THRU TROY FARM INSURANCE, INC.

ROBERTA E. ...
...
...
...



ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

INTRODUCTION

Florida Power and Light Company (FPL) proposes to revise Turkey Point Units 3 and 4 Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.g.7), Emergency Diesel Generator (EDG) loss of offsite power (LOOP) load acceptance hot start test within 5 minutes of the 24-hour EDG run, its associated footnote, and BASES. Currently, this SR contains a requirement to operate the EDG for 24 hours; during the first 2 hours, the EDG is to operate with its 2-hour-rated load and for the last 22 hours it is to operate at its continuous-rated load. Surveillance Requirement 4.8.1.1.2.g.7) currently requires that, within 5 minutes after completing this 24-hour test run, on a simulated LOOP signal, the EDG starts and energizes the emergency buses with any permanently connected loads within 15 seconds and energizes auto-connected shutdown loads through the load sequencer. The proposed change would revise the SR to allow for the separation of the LOOP load acceptance test from the 24-hour EDG test run. Alternatively, FPL proposes to conduct a hot restart of the EDG within 5 minutes of the completion of the 24-hour EDG test run and to verify the EDG's ability to achieve rated voltage and frequency within 15 seconds of the restart signal. The LOOP load acceptance test will be uncoupled from the 24-hour EDG test run but will continue to be conducted on an 18 month interval as required by existing SR 4.8.1.1.2.g.4).

BACKGROUND

As part of the NRC Technical Specification Improvement Program, NUREG-1366 reported the findings and recommendations of a comprehensive examination of SRs in TS that require testing during power operation. Certain recommendations from this study were designed to remove testing requirements which may be counter-productive to safety in terms of equipment degradation and availability, and were incorporated into the Improved Standard Technical Specifications (ISTS) issued by the NRC in September 1992.

The NRC issued Generic Letter (GL) 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," on September 27, 1993. For plants that have TS in a format that is different than the STS, GL 93-05 provides guidance to assist licensees in preparing license amendment requests to implement recommendations contained in NUREG-1366 as line-item TS improvements. The proposed TS changes of Attachment 3 are consistent with the intent of the



NUREG recommendations, the guidance of GL 93-05, and the format of the individual plant TS.

Section 10.1 of Enclosure 1 to GL 93-05 includes recommended improvements to Technical Specifications for EDGs. One of the recommended improvements is that the hot start test following the 24-hour EDG test run should be an EDG start test only (i.e., electrically loading of the EDG is not required). If the hot start test is not satisfactorily accomplished within 5 minutes following the 24-hour EDG test run, it should not be necessary to repeat the 24-hour EDG test run. The only requirement is that, should the post-24-hour EDG test run hot start test fail, the hot start test is to be re-performed within 5 minutes of operating the EDG at its continuous rating for 2 hours or until operating temperatures have stabilized.

DESCRIPTION OF PROPOSED CHANGE

FPL proposes to change the following TS SR.

Technical Specification Surveillance Requirement 4.8.1.1.2.g.7)

Revise SR 4.8.1.1.2.g.7) to allow for the separation of the LOOP load acceptance test from the 24-hour EDG test run to read as follows (proposed change in bold).

"7)* Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to 2550-2750 kW (Unit 3), 2950-3150 kW (Unit 4)** and during the remaining 22 hours of this test, the diesel generator shall be loaded to 2300-2500 kW (Unit 3), 2650-2850 kW (Unit 4)** (editorial note: these asterisks apply to footnote "***" on page 3/4 8-7, which reads, "Momentary transients outside these load bands do not invalidate this test." and not to the "***" footnote on page 3/4 8-8). The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 15 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, verify the diesel starts and accelerates to reach a generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz within 15 seconds after the start signal.**"

Additionally, FPL proposes to revise footnote "***" on page 3/4 8-8 consistent with this proposed change:

"**If verification of the diesel's ability to restart and accelerate to a generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz within 15 seconds following the 24 hour

operation test of Specification 4.8.1.1.2.g.7) is not satisfactorily completed, it is not necessary to repeat the 24-hour test. Instead, the diesel generator may be operated between 2300-2500 kW (Unit 3), 2650-2850 kW (Unit 4) for 2 hours or until operating temperature has stabilized (whichever is greater). Following the 2 hours/operating temperature stabilization run, the EDG is to be secured and restarted within 5 minutes to confirm its ability to achieve the required voltage and frequency within 15 seconds."

Justification: This change is proposed consistent with the intent of NUREG-1431, "Standard Technical Specifications - Westinghouse Plants" and NUREG-1366. Specifically, SR 4.8.1.1.2.g.7) is revised to allow for the separation of the LOOP load acceptance test from the 24-hour EDG test run.

The safety function of the EDGs is to supply AC electrical power to plant safety systems whenever the preferred AC power supply is unavailable. Corresponding to their importance to safety, EDGs have extremely detailed TS SRs compared to other pieces of mechanical and electrical equipment in a nuclear power plant. Through SRs, the ability of the EDGs to meet their load and timing requirements is confirmed.

Surveillance Requirement 4.8.1.1.2.g.7), as proposed, will demonstrate that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal surveillances, and achieve the required voltage and frequency within 15 seconds. The 15 seconds time is derived from the requirements of the accident analysis to respond to a design large break Loss of Coolant Accident (LOCA). By performing this SR after 24 hours (or after two hours, in accordance with the proposed revised footnote), the test is performed with the diesel sufficiently hot. The load band is provided to avoid routine overloading of the EDG. Routine overloads may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain EDG OPERABILITY. The requirement that the diesel has been operated for at least two hours at full load is based on NRC staff guidance for achieving hot conditions. Momentary transients due to changing bus loads do not invalidate this test.

Separating these two required tests gives the plant operators added flexibility and prevents critical path complications during the outages. As a result of the testing sequence currently dictated by the Turkey Point TS, a minimum of 24 hours of critical path time is spent each refueling outage performing the 24-hour EDG test run. By separating the two surveillance requirements, the 24-hour EDG test run can be completed off refueling outage critical path time.

SUMMARY

The proposed modification of the Turkey Point TS would revise the SR to allow for the separation of the LOOP load acceptance test from the 24-hour EDG test run. Alternatively, FPL proposes to conduct a hot start verification of the EDG's ability to achieve rated voltage and frequency within 15 seconds subsequent to the 24-hour EDG test run. The LOOP load acceptance test will be uncoupled from the 24-hour EDG test run but will continue to be conducted on an 18 month interval as required by existing SR 4.8.1.1.2.g.4). Consistent with the ISTS, the ability of the EDGs to restart from a hot condition, such as subsequent to shutdown from normal surveillances, and achieve the required voltage and frequency within 15 seconds, will be tested. The LOOP load acceptance test will be commenced with the EDGs in a "standby" condition, which is also consistent with the ISTS.

Attachment 3

PROPOSED TECHNICAL SPECIFICATIONS

Marked-up Technical Specification Pages:

3/4 8-8

B 3/4 8-4

Revised Insert A to pg. 3/4 8-8

Proposed Insert B to pg. 3/4 8-8

Proposed Insert C to pg. 3/4 8-8

Proposed Insert D to pg. B3/4 8-4