



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-31

AND AMENDMENT NO. 175 TO FACILITY OPERATING LICENSE NO. DPR-41

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated September 11, 1995, as supplemented by letter dated November 22, 1995, Florida Power and Light Company (FPL or the licensee) proposed a change to the Technical Specifications (TS) for Turkey Point Units 3 and 4. The change consists of revisions to the emergency diesel generator (EDG) testing requirements to incorporate the recommendations of Generic Letters 93-05 and 94-01. By letter dated November 22, 1995, the licensee provided additional information which did not change the staff's proposed no significant hazards consideration.

2.0 BACKGROUND

NUREG-1366 reported the findings and recommendations of a comprehensive examination of surveillance requirements in TS that require testing during power operation. Certain recommendations from this study were intended 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 (STS) issued by the NRC in September 1992.

TS currently require testing of EDGs on a periodic basis. In addition, EDG testing is required to prove operability when another EDG or other related equipment (eg. startup transformer) is inoperable. Although this EDG testing provides assurance that the EDGs are operable, the demands of the testing can cause additional wear on the EDG components. Testing performed when there is no reason to doubt EDG operability does not contribute to improved EDG reliability and is considered excessive. Excessive testing is detrimental to the mechanical components and could contribute to an overall reduction in the reliability of an EDG to start and perform its intended function.

Line-Item 10.1 of NUREG-1366 and GL 93-05 recommended improvements to the TS for the EDGs including the following items that the licensee is requesting to incorporate. When an EDG itself is inoperable (not including a support system or independently testable component), the other EDG(s) should be tested once unless the absence of any potential common-mode failure can be demonstrated. In addition, the requirement to test EDGs and other systems which are not associated with an inoperable train or subsystem (other than an inoperable EDG) should be deleted.

GL 94-01 provided guidance for deleting accelerated testing requirements for EDGs provided the provisions of the maintenance rule are implemented for the EDGs. The objective of this change is the prevention of EDG failures through maintenance while minimizing the unavailability due to monitoring or preventive maintenance. In addition, GL 94-01 stated that EDG Special Reporting requirements could be deleted from the plant TS since 10 CFR §50.72 and §50.73 address regulatory requirements for licensees to notify NRC and report individual EDG failures.

3.0 EVALUATION

3.1 Testing of Operable EDGs Due to Other Inoperabilities

TS 3.8.1., "A.C. Sources." The licensee proposed to delete the requirement to test the EDGs due to other inoperabilities (another EDG, startup transformer, etc.) unless there is some reason to question the operability of the EDG (such as a common mode failure). The testing of the EDGs due to the inoperability of other components provided added assurance that the operable EDGs were capable of supplying emergency power if needed.

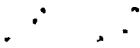
The licensee stated that the proposed wording has the same meaning as the generic example for this specification provided in GL 93-05, and is consistent with the syntax used in the BASES shown in the improved Standard TS (STS) for Westinghouse Plants (NUREG-1431). Twenty-four hours is allowed to perform testing on the EDGs which differs from the '8 hour' requirement of NUREG-1366 and GL 93-05, but is consistent with GL 84-15 guidance, current Turkey Point TS requirements, and NUREG-1431 requirements. Twenty-four hours provides a reasonable amount of time to perform the required testing, is consistent with the current licensing basis, and is therefore acceptable.

The maintenance and surveillance programs provide assurance that the operable EDGs are capable of performing their intended safety function. The inoperability of other EDGs or systems does not affect the reliability of the operable EDGs unless there is some common mode failure possibility. Conditions which cause the licensee to question the operability of EDGs will require the licensee to test the questionable EDG. This change is consistent with NUREG-1366 and GL 93-05, Item 10.1. For the above reasons, this change is acceptable.

3.2 Deletion of Accelerated Testing

Surveillance requirement (SR) 4.8.1.1.2a. The licensee proposed to revise the frequency of EDG surveillance testing to "At least once per 31 days on a STAGGERED TEST BASIS." The previous testing frequency was based on EDG test failures and required more frequent (accelerated) testing when a number of failures are experienced.

The licensee stated that implementing the provisions of the maintenance rule (10 CFR 50.65) for EDGs and the associated support systems that impact EDG availability will assure acceptable EDG performance. The



licensee committed to implement, within 90 days following issuance of the license amendments, a maintenance program for monitoring and maintaining EDG performance consistent with the provisions of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and the guidance of RG 1.160.

As stated in GL 94-01, "...the staff has concluded that it is not necessary to await the effective date of the maintenance rule to remove the associated TS requirements nor is it necessary to relocate accelerated testing requirements to the maintenance program." The proposed TS change is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.2."

The staff concludes that the proposed change is consistent with GL 94-01. The proposed changes ensure that the EDGs will perform their intended functions by prevention of EDG failures through maintenance and periodic surveillance testing. The staff finds that the proposed changes are acceptable for the reasons specified above.

3.3 Reporting Requirements

The licensee proposed to change TS SR 4.8.1.1.3, "Reports," to delete the specified reporting requirement. This change is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.3." 10 CFR 50.72 and 50.73 adequately address the regulatory requirements for licensees to notify NRC and report individual EDG failures, making this TS unnecessary. The staff finds that the proposed changes are acceptable for the reasons specified above.

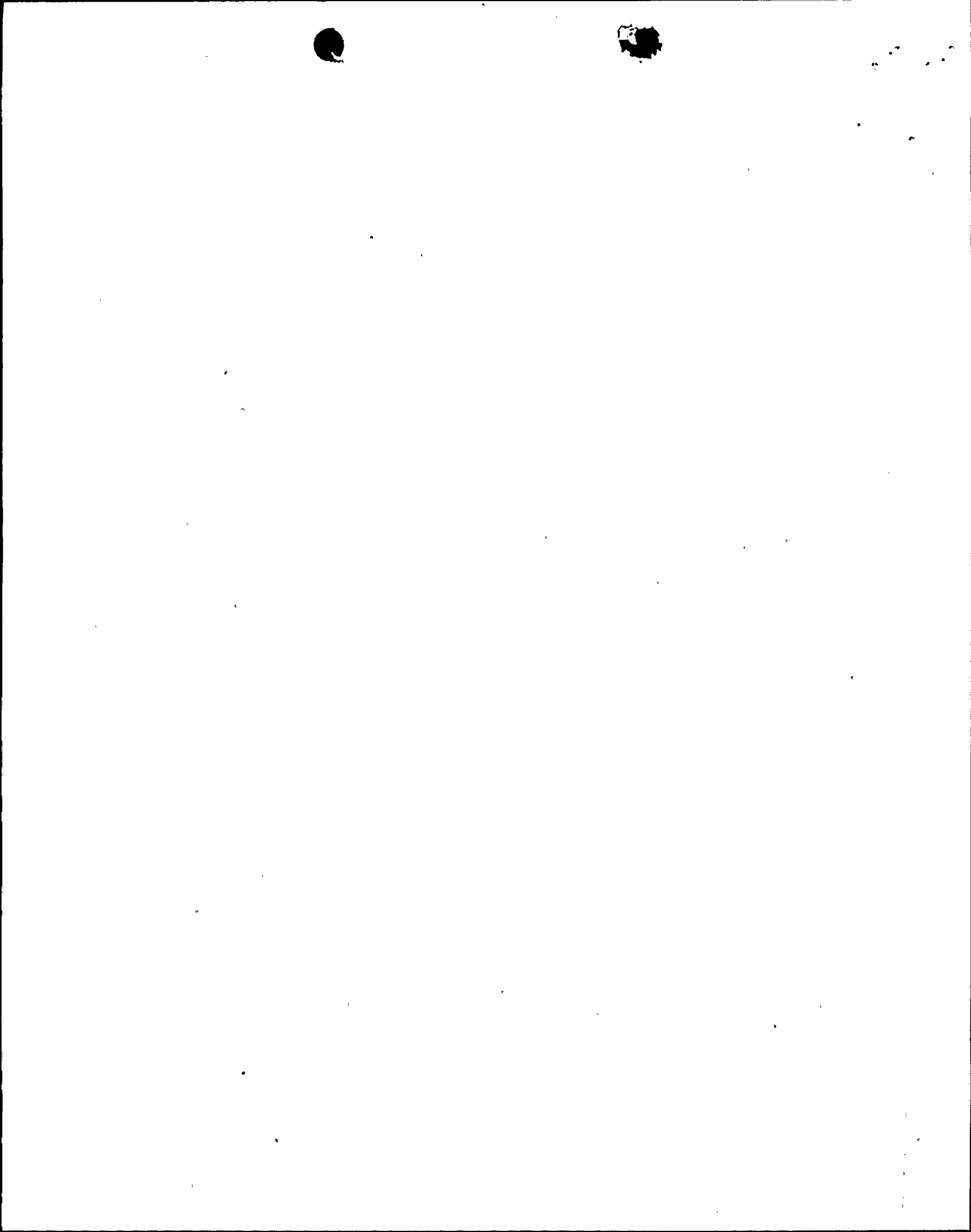
3.4 Editorial Changes

The licensee also requested that wording from a current TS footnote be incorporated into the action statement for the appropriate TS sections, thereby eliminating the need for the footnote. Other editorial changes were proposed to correctly implement the technical changes associated with this request. These editorial and administrative changes have no impact on the technical content of the TS, do not affect the health and safety of the public, do not impact the operability of the systems, and are therefore acceptable.

4.0 CONCLUSION

The staff concludes that the proposed TS changes are acceptable since the EDGs will continue to perform their intended functions. EDG failures will be minimized through the maintenance and periodic surveillance testing programs. The proposed changes do not adversely affect plant safety. For these reasons, the staff finds the proposed changes acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such



activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

5.0 STATE CONSULTATION

Based upon the written notice of the proposed amendments, the Florida State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and a change to surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 52930). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

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Date: December 28, 1995

