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HOVEY,R.J. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41,revising TS 3/4.5.1 to remove SRs & operability requirements for ECCS SI accumulators that concern water level & pressure channels from TS,per Line-Item 7.4 from GL 93-05.

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MAR 20 1996

L-96-015
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 & 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
NRC Generic Letter 93-05 Item 7.4:
Accumulator Water Level and Pressure Channel

In accordance with 10 CFR §50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify the Turkey Point Units 3 & 4 Technical Specifications in accordance with Line-Item 7.4 from NRC Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation".

FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR §50.92. A description of the amendments request is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specification changes is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications.

In accordance with 10 CFR §50.91(b)(1), a copy of these proposed license amendments are being forwarded to the State Designee for the State of Florida.

The proposed license amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions on this request, please contact us.

Very truly yours,

Robert J. Hovey
Vice President
Turkey Point Plant

CDV

Attachments

cc: S. D. Ebneter, 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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STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

Robert J. Hovey being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Plant, 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.

Robert J. Hovey

Subscribed and sworn to before me this
30th day of March, 1996.

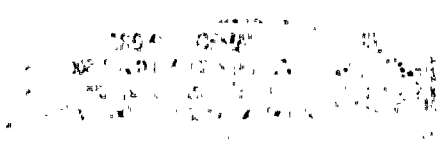
James F. Knorr
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of Dade, State of Florida

My Commission expires Jan 22, 1999
Commission No. CC 434300

Robert J. Hovey is personally known to me.

JAMES E. KNORR
MY COMMISSION # CC 434300
EXPIRES: January 22, 1999
Bonded Thru Notary Public Underwriters



ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

DESCRIPTION AND PURPOSE

Changes are proposed to revise Turkey Point Units 3 and 4 Technical Specifications (TS) Section 3/4.5.1 to remove the surveillance requirements and operability requirements for the Emergency Core Cooling System (ECCS) Safety Injection (SI) accumulators that concern the Water Level and Pressure Channels from the TS. This change is consistent with the recommendations of Nuclear Regulatory Commission (NRC) Generic letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," Item 7.4, NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," Items 7.4, and NUREG-1431, Rev.1, "Standard Technical Specifications (STS) - Westinghouse Plants". Furthermore, the ECCS SI Accumulator instrumentation has been evaluated in accordance with the four criterion of 10 CFR 50.36, and the evaluation has determined that its inclusion in the TS is not required.

The proposed amendment will remove the surveillance maintenance requirements from the current Technical Specifications. It will remove the requirement that the Water Level and Pressure Channel instrumentation must be operable in order to establish operability of the accumulators. These changes are requested in accordance with the NRC staff guidance, per GL 93-05, recognizing that accumulator instrumentation operability is not directly related to the capability of the accumulators to perform their safety function. Furthermore, it is requested that the ACTION statements be revised to be in accordance with NUREG-1431.

BACKGROUND

The staff of the NRC has completed a comprehensive examination of surveillance requirements in technical specifications that require testing during power operation. This effort was part of the Technical Specification Improvement Program (TSIP). The results of this work were presented in NUREG-1366. NUREG-1366 provided recommendations based on NRC findings. GL 93-05 was subsequently issued to provide guidance to licensees who plan to adopt applicable recommendations (line-item improvements). The improved standard technical specifications (ISTS) for Westinghouse Plants, published as NUREG-1431, were based in part on findings in NUREG-1366, which reduced the selected requirements for testing at power. The title and number of the following proposed line-item improvement corresponds to the section title and number in NUREG 1366 and Enclosure 1 to GL 93-05, and also provided is the number of the ISTS which the requested change will reflect. The proposed changes are compatible with plant operating experience and are consistent with the guidance provided by the NRC.

Section 182a of the Atomic Energy Act (the Act) requires applicants for nuclear power plant operating licenses to include TSs as part of the license. In 10 CFR 50.36, the Commission established the regulatory requirements related to the content of TSs. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in TSs.

The NRC developed criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39132), to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. Four criteria were subsequently incorporated into the regulations by an amendment to 10 CFR 50.36 (60 FR 36953):

1. installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;

2. a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;

3. a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;

4. a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

DISCUSSION AND DESCRIPTION OF PROPOSED CHANGES

The following changes in plant TS, shown in Attachment 3, are proposed:

<u>GL 93-05 Section 7.4 - Accumulator Water Level and Pressure Channel Surveillance Requirements (PWR)</u>

GL 93-05 Recommendation: "Specification 4.5.1.1.2 ... may be removed from TS but should be retained as an existing plant procedure requirement that may be subsequently modified under plant change control procedures and the related requirements of the Administrative Controls Section of the TS."

NUREG-1431 Westinghouse STS 3.5.1

NUREG 1431 Recommendation: The ISTS for SI accumulators removes the requirement for Water Level and Pressure Channel operability and surveillances to maintain operability of the ECCS accumulator system.

TS 4.5.1 - The current TS require that a water level and pressure instrument be operable in order for an ECCS accumulator to be operable. It also requires that a periodic (monthly) Analog Channel Operational Test and (quarterly) Channel Calibration be performed for each channel. In addition to the surveillance requirements, the TS also requires the following two ACTION statements that deal with accumulator operability out-of-service times:

(1) With one accumulator inoperable, except as a result of a closed isolation valve, restore the inoperable accumulator to OPERABLE status within 4 hours or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.

(2) With one accumulator inoperable due to the isolation valve being closed, either immediately open the isolation valve or be in at least HOT STANDBY within 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.

Therefore, FPL requests to revise the Turkey Point Unit 3 and 4 TS to remove the requirements for basing the operability of the accumulators on the operability of the Water Level and Pressure Channel Instruments. Subsequently, this will also remove the surveillance requirements for the Water Level and Pressure Channels from the TS and move them to appropriate plant procedures, while changing the requirement for tank volume and nitrogen cover pressure surveillance to be verified by any valid means, not just instrumentation, once every 12 hours.

Furthermore, FPL requests to amend the ACTION statements of TS 3.5.1 to reflect the requirements of NUREG-1431 STS 3.5.1 by requiring a 72 hour period to restore boron concentration if it is not within the limits, and a 1 hour period to restore any other out-of-specification surveillance prior to entering TS Limiting Condition For Operation (LCO) 3.0.3.

Justification:

GL 93-05 recommended that the surveillance for accumulator Water Level and Channel Instruments be moved from the TS to plant procedures. The reasoning for this is that the instruments have no specific safety function, and merely provide an indicating function. The instrumentation in no way affects the capability of the accumulators to perform their respective safety function. When evaluated per the four criterion stated above in 10 CFR 50.36, the SI Accumulator Water Level and Pressure Channel Instrumentation does not meet any of the requirements for inclusion in the TS. Following the guidance of GL 93-05, the surveillance requirement for accumulator Water Level and Pressure Channel

Instrumentation will be deleted and moved to the appropriate plant procedures.

Also, Turkey Point TS state that accumulator operability is based on the Water Level and Pressure Channel Instruments functioning properly. However, the instrumentation operability is not directly related to the accumulators' ability to perform their safety function. Consequently, the TS Surveillance Requirements for verifying level and cover pressure are to be changed to "verify" vice "verify the indicated". These proposed TS changes are consistent with Turkey Point Units 3 and 4 design and operational experience, as well as being consistent with the guidance provided in NUREG-1366.

The requested change for ACTION Statements a) and b) are consistent with the direction of NUREG-1431 and Turkey Point operational requirements. If the boron concentration of one accumulator is not within limits, it must be returned to within the limits within 72 hours. In this condition, ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break Loss Of Coolant Accident (LOCA) is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current Turkey Point analysis demonstrates that the accumulators discharge only a small amount following a large main steam line break. Their impact is minor since the use of the accumulator volume compensates for Reactor Coolant System shrinkage and the change in boron concentration is insignificant. Thus, 72 hours is allowed to return the boron concentration to within limits.

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 1 hour. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these conditions, the 1 hour Completion Time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The Completion Time minimizes the potential for exposure of the plant to a LOCA under these conditions. Since a closed isolation valve falls into this action statement, the ACTION time will be changed from <u>immediately</u> to <u>within 1 hour</u>. This is not a relaxation of an existing TS requirement, merely an added clarification to the time requirement. The one hour time requirement gives adequate time to reopen the valve and also satisfies the intent of "immediate" action.

SUMMARY

The proposed revision to Turkey Point Units 3 and 4 TS 4.5.1 is consistent with the recommendations and guidance of GL 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," NUREG 1366, "Improvements to Technical Specifications Surveillance Requirements," Item 7.4, and NUREG-1431, "Standard Technical Specifications (STS) - Westinghouse Plants". Removal of the ECCS SI accumulator Water Level and Pressure Channel requirements from the current TS will allow future changes to be modified under plant change control procedures and the related requirements of the Administrative Controls Section of the TS.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

The proposed license amendments involve changes to the existing Turkey Point Units 3 and 4 Technical Specifications (TS). These changes are consistent with guidance provided by NUREG-1366 and NRC Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation". These changes do not affect plant design or the modes of plant operation. The reduction in surveillance requirements during power operation will improve safety, reduce equipment degradation, and ease the burden on personnel resources. The following proposed changes are requested:

TS 3.5.1: Remove the requirements for the accumulator to be OPERABLE by having a water level and pressure channel OPERABLE. Delete the requirements for surveillances of the water level and pressure channel instrumentation. Modify the existing ACTION statements of TS 3.5.1 to reflect the requirements of NUREG-1431 STS 3.5.1 by requiring a 72 hour period to restore boron concentration if it is not within the limits, and a 1 hour period to restore any other out-of-specification surveillance prior to entering TS Limiting Condition For Operation (LCO) 3.0.3.

INTRODUCTION

The Nuclear Regulatory 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; 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. Each standard is discussed below for the proposed amendments.

DISCUSSION

(1) **Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed amendments conform to the guidance given in Enclosure 1 of the NRC GL 93-05. The overall functional capabilities of the Emergency Core Cooling System (ECCS) accumulators will not

be modified by the proposed change. This amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons:

1) The Water Level and Pressure Channel Instrumentation does not perform a specific safety function, and merely provides an indicating function. The instrumentation in no way affects the capability of the accumulators to perform their respective safety function.

2) The changes in most of the ACTION statements are more restrictive than current TS requirements due to the one hour vice four hour completion time, and therefore will not increase the probability or consequences of a previously evaluated accident. If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 1 hour. In this condition, the required contents of three accumulators cannot be assumed to reach the core during a Loss Of Coolant Accident (LOCA). Due to the severity of the consequences should a LOCA occur in these conditions, the 1 hour completion time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The completion time minimizes the potential for exposure of the plant to a LOCA under these conditions. The 1 hour requirement for restoring a closed isolation valve is merely a clarification of the existing "immediate" time requirement.

3) In the case of low-out-of-specification boron concentration in one accumulator, it must be returned to within the limits within 72 hours. In this condition, ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break LOCA is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current Turkey Point analysis demonstrate that the accumulators discharge only a small amount following a large main steam line break. Therefore, their impact on boron concentration in the reactor coolant system is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits and does not increase the probability or consequences of an accident previously evaluated.

(2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The use of the modified specifications can not create the possibility of a new or different kind of accident from any previously evaluated since the proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. No new failure mode is introduced due to the surveillance changes and clarifications, since the proposed changes do not involve the addition or modification of equipment nor do they alter the design or operation of affected plant systems.

(3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

The operating limits and functional capabilities of the affected system are unchanged by the proposed amendment. The modified specifications which remove surveillance requirements from the TS to plant procedures are consistent with the NRC GL 93-05 line-item improvement guidance do not significantly reduce any of the margins of safety even though the amount of surveillances is decreased. The modification of the existing ACTION Statements do not have an adverse on affect on the margin of safety for the following reasons:

1) The SI Accumulator Water Level and Pressure Channel instrumentation performs no safety function.

2) The changes in ACTION statements a) and b) are for the most part more restrictive than existing TS requirements, the reason being the removal of instrumentation requirements for operability.

3) In the case of low-out-of-specification boron concentration in one accumulator, the requirement will be less restrictive, but the low boron concentration in one accumulator will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood and therefore will not significantly reduce the margin of safety.

SUMMARY

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, (3) involve a significant reduction in a margin of safety; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR §50.92.