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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising
 TS to achieve consistency throughout document by removing
 outdated matl & incorporating administrative clarifications
 & corrections.

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L-96-019
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
Various Administrative Technical Specification Improvements

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 and 4 Technical Specifications. The purpose of this amendment is to revise the Technical Specifications to achieve consistency throughout this document by (a) removing outdated material, and (b) incorporating administrative clarifications and corrections. Comparisons have been made with NUREG-1431, "Standard Technical Specifications - Westinghouse Plants", and changes are requested to ensure consistency with that NUREG.

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 Specifications 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 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,

R. J. Hovey
Vice President
Turkey Point Plant

CDV

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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ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

The proposed amendments revise the Turkey Point Units 3 and 4 Technical Specifications (TS) to achieve consistency throughout the TS by (a) removing outdated material, and (b) incorporating administrative clarifications and corrections. These changes represent an administrative update to the Turkey Point Units 3 and 4 TS. Each of the proposed changes is discussed in detail below.

Background

Through periodic examinations of Turkey Point Units 3 and 4 TS, several administrative inconsistencies were noted throughout the TS. These inconsistencies were then cross-checked and verified to actually be in error, based on a review of NUREG-1431 and the present TS. FPL proposes to amend the following TS to correct these administrative errors, add clarification, and maintain consistency throughout Turkey Point Units 3 and 4 TS.

Discussion and Description of Proposed Changes

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

1. TS 4.0.2 - Limiting Conditions for Operation and Surveillance Requirements

Recommendation: Add the following clarification as shown below:

"If an ACTION item requires periodic performance on a "once per ..." basis, the above frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications."

Justification: This proposed change will further clarify the requirements for meeting the specified frequency for a required ACTION statement with a completion time that requires the periodic performance of the required ACTION on a "once per ..." interval. The applicability of this concept is stated in NUREG-1431, Rev 1, TS Surveillance Requirement 3.0.2. This extension facilitates scheduling and considers plant operating conditions that may not be suitable for conducting the required ACTION (e.g., transient conditions or other ongoing surveillance or maintenance activities). The 25% extension does not significantly degrade the reliability that results from performing the required ACTION item at its specified frequency.

A statement is also added to provide for possible exceptions to this extension as specified in individual Specifications.

2. TS 3.8.1.1 - A.C. Sources

Recommendation: Delete the requirement to notify the NRC within 24 hours of declaring a startup transformer inoperable from ACTION statement a.

Justification: This reporting requirement would be deleted from the plant TS since 10 CFR 50.72 and 50.73 address the regulatory requirement for licenses to notify the NRC and report failures. This proposed change is in accordance with the guidance of NUREG-1431.

3. TS 3.9.8.1 - Residual Heat Removal (RHR) and Coolant Circulation - High Water

Recommendation: Change the footnote at the bottom of the page to read as follows:

- * The required RHR loop may be removed from operation for up to 1 hour per 8 hour period, provided no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration.

Justification: The current TS only allows the temporary securing of RHR for CORE ALTERATIONS only. The proposed change will allow temporary suspension of RHR for activities such as core verification inspections also. This requirement was initially foreseen to only affect CORE ALTERATIONS near the reactor vessel hot leg nozzles that required the securing of RHR. Since the analysis for temporary securing of RHR is independent of whether or not CORE ALTERATIONS are being performed, this revision will only further clarify that activities other than CORE ALTERATIONS can be performed while RHR is secured, therefore not affecting the analytical justification for temporary RHR suspension.

Summary

The proposed revisions to Turkey Point Units 3 and 4 Technical Specifications are administrative in nature. These requested changes do not have an adverse effect on plant safety, security or operation, do not constitute an unreviewed safety question, and do not require changes to the Technical Specifications other than administrative changes. These proposed changes do not constitute changes to the plant or to procedures as described in the UFSAR, nor do they change any test or experiment as described in the UFSAR. FPL proposes to revise the Turkey Point Units 3 and 4 TS to achieve consistency throughout the TS by (a) removing outdated material, and (b) incorporating administrative clarifications by changing the selected Technical Specifications mentioned above.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

The proposed license amendments involve administrative changes to existing requirements of Turkey Point Units 3 and 4 Technical Specifications (TS). These changes do not affect plant design or the modes of plant operation. The following proposed changes are requested:

1. TS 4.0.2 - Limiting Conditions for Operation and Surveillance Requirements

Recommendation: Add the following clarification as shown below:

"If an ACTION item requires periodic performance on a "once per ..." basis, the above frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications."

A statement is also added to provide for possible exceptions to this extension as specified in individual Specifications.

2. TS 3.8.1.1 - A.C. Sources

Recommendation: Delete the requirement to notify the NRC within 24 hours of declaring a startup transformer inoperable from ACTION statement a.

3. TS 3.9.8.1 - Residual Heat Removal (RHR) and Coolant Circulation - High Water

Recommendation: Change the footnote at the bottom of the page to read as follows:

- * The required RHR loop may be removed from operation for up to 1 hour per 8 hour period, provided no operations are permitted that would cause reduction of the Reactor Coolant System boron concentration.

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 are purely administrative in nature. These amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

- (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 administrative 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, structures, or components.

- (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 systems, structures, and components are unchanged by the proposed amendments. The modified specifications which correct administrative errors and clarify existing Technical Specification requirements do not significantly reduce any of the margins of safety.

Based on the above, FPL has determined that the proposed amendment request does not (1) involve a significant increase in the probability



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Attachment 2
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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.



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