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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.188 TO FACILITY OPERATING LICENSE NO. DPR-31

AND AMENDMENT NO.182 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 March 21, 1996, Florida Power and Light (FPL or the licensee) proposed a change to the Technical Specifications (TS) for Turkey Point Units 3 and 4. Additional information was provided by letter dated May 13, 1996. The proposed changes would relocate the requirements for Radiological Effluent Controls from TS to the Offsite Dose Calculation Manual (ODCM) or the Process Control Program (PCP). The changes proposed are in accordance with NRC Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radioactive Effluent Technical Specifications," NUREG-1431, Rev. 1, "Standard Technical Specifications - Westinghouse Plants," and NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Controls for Pressurized Water Reactors." New programmatic controls for radioactive effluent and radiological environmental controls were proposed for incorporation into the TS. In addition, the licensee proposed relocating the TS requirements for Gas Decay Tanks and Explosive Gas Mixture to a different area within the TS.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS 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.

On July 19, 1995, the Commission published revisions to 10 CFR 50.36 specifying what must be included in limiting conditions for operation in the TS (60 FR 36953). The new Final Rule identifies four criteria to be used in determining whether a particular matter is required to be included in the TS, as follows: (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 (10 CFR 50.36(c)(2)(ii)(A)-(D)). As a result, existing TS limiting conditions for operation which fall within or satisfy any of the criteria in 10 CFR 50.36(c)(2)(ii)(A)-(D) must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

3.0 EVALUATION

The staff has reviewed the licensee's proposed changes to the TS and finds that the request to relocate the Radiological Effluent Technical Specifications (RETS) is consistent with the guidance provided in GL 89-01 and with the standard TS in NUREG-1431. The line-item improvements in GL 89-01 allow (1) the relocation of the existing procedural details of the current RETS to the plant's ODCM or PCP, as appropriate, and (2) the incorporation of programmatic controls for radioactive wastes in the administrative controls section of the TS. The staff considers that any future changes to the relocated RETS will be adequately controlled by TS Sections 6.13.2 and 6.14.2 which address changes to the PCP and ODCM.

The specific changes to the TS are addressed below:

1. The amendments revise the TS Index to reflect the deletion of TS 1.15, 1.16, 1.21, 3/4 3.3.5, Table 3.3-7, Table 4.3-5, 3/4 3.3.6, Table 3.3-8, 3/4.11, TS 3/4.12, and TS 6.15 and Table 4.3-6 and the addition of Sections for TS 3/4.7.8 and 3/4.7.9. The amendments also revise the TS Index to reflect the deletion of TS removal of TS 3/4 3.3.4 and Table 3.3-6 which were removed in an earlier submittal, but not removed from the Index. These are administrative and editorial changes which do not affect the technical content of the TS and are, therefore, acceptable.

2. In TS Section 1.0, Definitions, the amendments delete the definitions of member(s) of the public, offsite dose calculation manual, and process control program. The definition for member of the public is specified in 10 CFR 20 while the description of the offsite dose calculation manual and process control program are described in Section 6 of the TS. These terms are also defined in the ODCM and PCP procedures, as appropriate. These changes are acceptable since the terms remain adequately defined.

3. TS Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints," and Table 3.3-4, "Radiation Monitoring Instrumentation for Plant Operation," were changed to reference the ODCM rather than TS 3.11.2.1 since that section is relocated to the TS, as discussed below. In addition, blank pages for TS 3/4 3.3.4 and Table 3.3-6 are removed from the TS since there is no need to keep these blank pages in the TS. These are administrative changes which do not affect the technical content of the TS and are, therefore, acceptable.

4. TS Sections 3.3.3.5, 4.3.3.5, Table 3.3-7, and Table 4.3-5 on "Radioactive Liquid Effluent Monitoring Instrumentation" is being deleted in its entirety. The contents were relocated to the ODCM and relocation was verified by the staff. Programmatic controls have been incorporated into TS Section 6. The requirements relocated do not meet any of the four criteria in 10 CFR 50.36 and can be removed and relocated to a licensee-controlled document, in this case the ODCM. The change is also consistent with GL 89-01. For these reasons, the proposed changes are acceptable and the staff notes that the changes are consistent with the new standard TS.

5. TS Sections 3.3.3.6, 4.3.3.6, Table 3.3-8, and Table 4.3-6 on "Radioactive Gaseous Effluent Monitoring Instrumentation" was revised. Reference to radioactive gaseous effluent was removed and only explosive gas monitoring requirements were retained. The radioactive gaseous effluent requirements were relocated to the ODCM and relocation was verified by the staff. The requirements relocated do not meet any of the four criteria in 10 CFR 50.36 and can be removed and relocated to a licensee-controlled document, in this case the ODCM. Programmatic controls have been incorporated into TS Section 6. The change is also consistent with GL 89-01. For these reasons, the proposed changes are acceptable and the staff notes that the changes are consistent with the new standard TS.

6. TS Section 3/4.11, "Radioactive Effluents" is being deleted in its entirety. The contents of Section 3/4.11 were relocated to the ODCM or the PCP, as appropriate, and relocation was verified by the staff. Programmatic controls were added to TS Section 6. The requirements relocated do not meet any of the four criteria in 10 CFR 50.36 and can be removed and relocated to a licensee-controlled document, in this case the ODCM and the PCP. The change is also consistent with GL 89-01. For these reasons, the proposed changes are acceptable and the staff notes that the changes are consistent with the new standard TS.

   Since Section 3/4.11 is deleted, the requirements of 3/4.11.2.5 regarding explosive gas and 3/4.11.2.6 pertaining to gas decay tanks were relocated to TS Section 3/4.7, "Plant Systems." The technical content of these sections was not changed, only the location within the TS; therefore, these changes are acceptable.

7. TS Section 3/4.12, "Radiological Environmental Monitoring" is being deleted in its entirety. The contents of 3/4.12 were relocated to the ODCM and relocation was verified by the staff. Programmatic controls were added to TS Section 6. The requirements relocated do not meet any of the four criteria in 10 CFR 50.36 and can be removed and relocated to a licensee-controlled document, in this case the ODCM. The change is also consistent with GL 89-01. For these reasons, the proposed changes are acceptable and the staff notes that the changes are consistent with the new standard TS.

8. TS Section 6.8, "Procedures and Programs," was revised to incorporate programmatic controls that satisfy the requirements of 10 CFR 20.1302, 40 CFR Part 190, and 10 CFR 50.636, and Appendix I to 10 CFR Part 50. Sections 6.8.4f, "Radiological Effluents Controls Program," and 6.8.4g,

"Radiological Environmental Monitoring Program" were added. The revision is consistent with GL 89-01 (except revised TS 6.8.4.f.7) and some wording has been modified for consistency with NUREG-1431, Rev 1. Revised TS 6.8.4.f.7 regarding limitations on dose rates from gaseous effluent releases is not consistent with GL 89-01 or NUREG-1431, Rev 1, however, the revised section is consistent with the current Turkey Point TS which is acceptable. The revised TS 6.8.4.f.7 is effectively a relocation of the current TS 3.11.2.1 and is therefor acceptable. The changes ensure that adequate control will be maintained over these programs and the additions are therefore acceptable.

9. TS Section 6.9 specifies reporting requirements. Section 6.9.1.3, "Annual Radiological Environmental Operating Report," is being revised to relocate most of the prescriptive details required in the report to the ODCM. TS 6.9.1.3 will continue to specify that the material provided in this report shall be consistent with the objectives outlined in the ODCM and 10 CFR 50, Appendix I. The proposed TS and proposed report due date are consistent with GL 89-01 and NUREG-1431, Rev 1. The proposed changes are acceptable.

10. Section 6.9.1.4, "Annual Radioactive Effluent Release Report," is being revised to relocate most of the prescriptive details required in the report to the ODCM. TS 6.9.1.4 will continue to specify that the material provided in this report shall be consistent with the objectives outlined in the ODCM and PCP; and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1. The proposed changes are consistent with GL 89-01 and also reflect the current wording of NUREG-1431, Rev 1. The proposed changes are acceptable.

11. Section 6.10.3, "Record Retention" was revised to include a new requirement retention of records for reviews performed for changes made to the ODCM and PCP. This change is in accordance with GL 89-01 and is acceptable.

12. Section 6.13, "Process Control Program," was modified by addition of a definition of the PCP and description of the control of licensee-initiated changes to the PCP. In addition, the requirement to submit changes to the PCP in the Annual Radioactive Effluent Release Report was deleted. This is consistent with GL 89-01 and the guidance of NUREG-1431, Rev 1, wording for the ODCM (NUREG-1431, Rev 1, does not contain this section for the PCP). The proposed changes are acceptable.

13. Section 6.14, "Offsite Dose Calculation Manual," was modified by the addition of a definition of the ODCM, description of the ODCM, and control of licensee-initiated changes to the ODCM. The definition is consistent with the previous definition of TS 1.16. The other changes are consistent with GL 89-01 and the guidance of NUREG-1431, Rev. 1. The proposed changes are acceptable.

14. Section 6.15, "Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems," was deleted. These procedural details have been relocated to the ODCM and were verified by the staff. The proposed change is consistent with GL 89-01, and are, therefore, acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change 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 (61 FR 31180). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). The amendments also change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, with respect to these items, the amendments must meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

6.0 CONCLUSION

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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: July 31, 1996