

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT PLANT UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 192 License No. DPR-31

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (the licensee) dated July 17, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-31 is hereby amended to read as follows:
 - (B) Technical Specifications and Environmental Protection Plan

The **Technical** Specifications contained in Appendix A, as revised through Amendment No. 192, are hereby incorporated in the license. The **Environmental** Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Frederick J. Hebdon, Director Project Directorate II-3

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: October 4, 1996

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

FLORIDA POWER AND LIGHT COMPANY

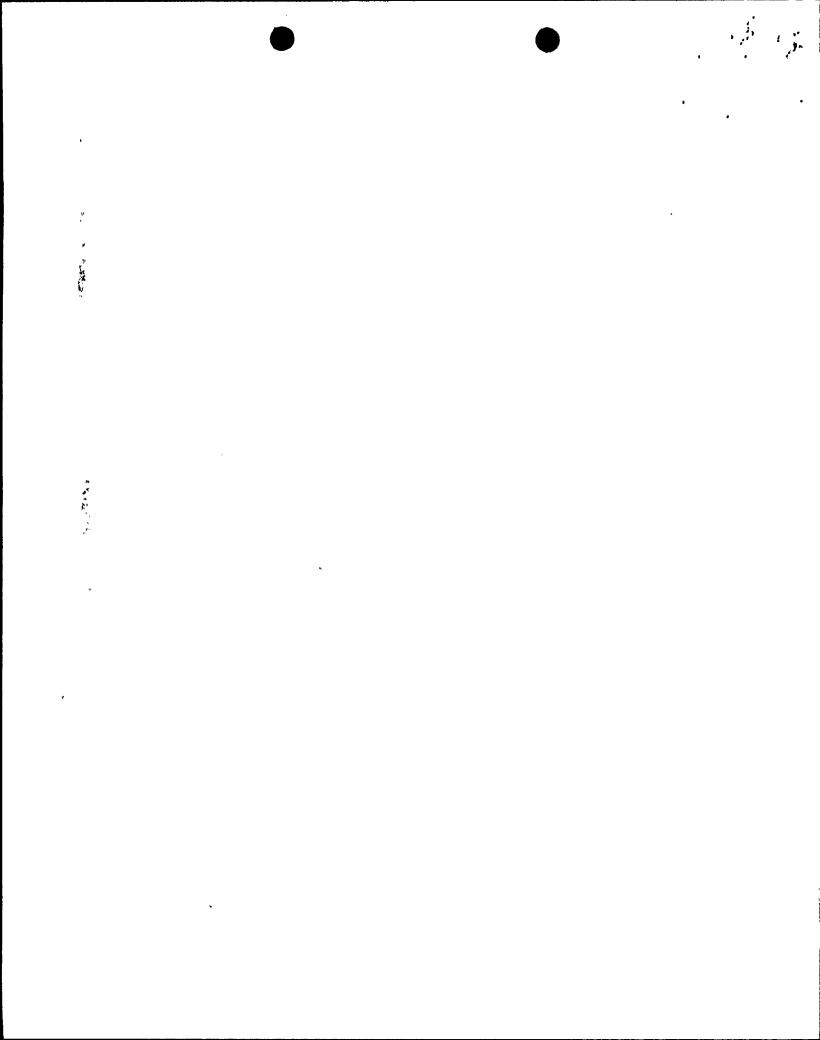
DOCKET NO. 50-251

TURKEY POINT PLANT UNIT NO. 4

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 186 License No. DPR-41

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power and Light Company (the licensee) dated July 17, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.



- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-41 is hereby amended to read as follows:
 - (B) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No.186, are hereby incorporated in the license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Frederick J. Hebdon, Director

Project Directorate II-3

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

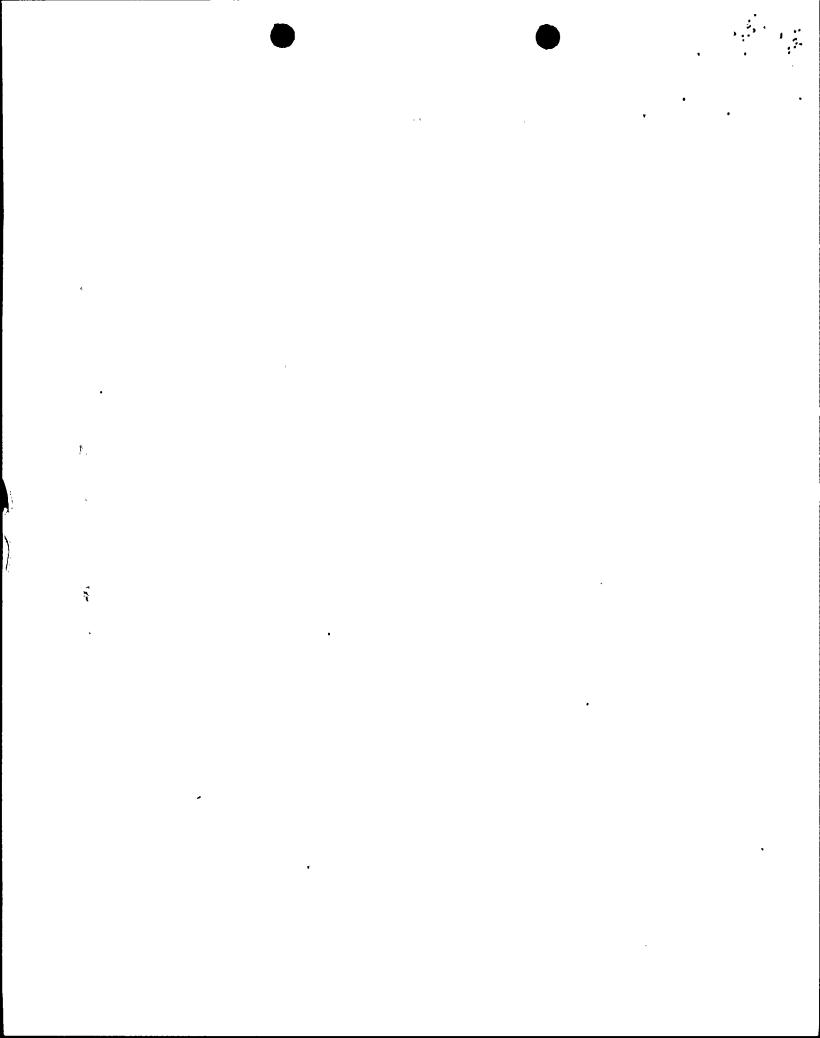
Date of Issuance: October 4, 1996

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 192 FACILITY OPERATING LICENSE NO. DPR-31 AMENDMENT NO. 186 FACILITY OPERATING LICENSE NO. DPR-41 DOCKET NOS. 50-250 AND 50-251

Revise Appendix A as follows:

Remove pages	<u>Insert pages</u>
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3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

· LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

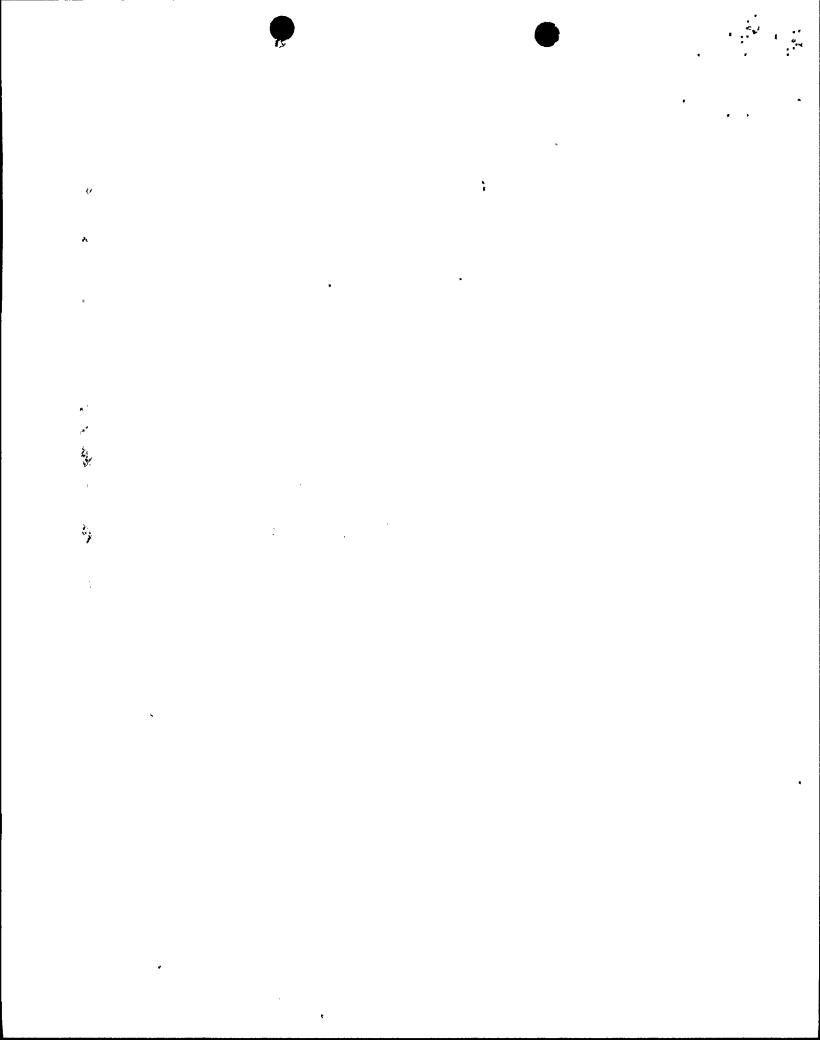
SURVEILLANCE REQUIREMENTS

4.6.1.1 CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations** not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions;
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3.

^{*}Exception may be taken under Administrative Controls for opening of valves and airlocks necessary to perform surveillance, testing requirements and/or corrective maintenance. In addition, Specification 3.6.4 shall be complied with.

^{**}Except valves, blind flanges, and deactivated automatic valves which are located inside the containment and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.



CONTAINMENT SYSTEMS

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited in accordance with the Containment Leakage Rate Testing Program.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the measured overall integrated containment leakage rate exceeding 1.0 L_a within one hour, initiate action to be in HOT STANDBY within the next 6 hours, and COLD SHUTDOWN within the following 30 hours. Restore the overall integrated leakage rate to less than 0.75 L_a and the combined leakage rate for all penetrations subject to Type B and C tests to less than 0.60 L_a prior to increasing the Reactor Coolant System temperature above $200^{\circ}F.$

SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the required test schedule and shall be determined in conformance with the criteria specified in the Containment Leakage Rate Testing Program.

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CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, or during the performance of containment air lock surveillance and/or testing requirements, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate in accordance with the Containment Leakage Rate Testing Program.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one containment air lock door inoperable:
 - Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24° hours or lock the OPERABLE air lock door closed;
 - Operation may then continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days;
 - 3. Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

- 4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:
 - a. Following each closing, at the frequency specified in the Containment Leakage Rate Testing Program, by verifying that the seals have not been damaged and have seated properly by vacuum testing the volume between the door seals in accordance with approved plant procedures.
 - b. By conducting overall air lock leakage tests in accordance with the Containment Leakage Rate Testing Program.
 - c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

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SURVEILLANCE REQUIREMENTS (Continued)

- d. Assuring that the observed lift-off force for each tendon exceeds the minimum required lift-off force. Required lift-off forces shall be calculated individually for each surveillance tendon prior to the beginning of each surveillance, and should consider such factors as:
 - 1) Prestressing history:
 - 2) Friction losses; and
 - 3) Time-dependent losses (creep, shrinkage, relaxation), considering time elapsed from prestressing.
- e. Verifying the OPERABILITY of the sheathing filler grease by:
 - Minimum grease coverage exists for the different parts of the anchorage system, and
 - 2) The chemical properties of the filler material are within the tolerance limits as specified by the manufacturer.
- 4.6.1.6.2 End Anchorages and Adjacent Concrete Surfaces. The structural integrity of the end anchorages of all tendons inspected pursuant to Specification 4.6.1.6.1 and the adjacent concrete surfaces shall be demonstrated by determining through visual inspection that no unacceptable levels of corrosion exist on the end anchorages and no unacceptable cracking exists in the concrete adjacent to the end anchorages. Determination of acceptance levels shall be by engineering evaluation of the areas in question. If unacceptable conditions are found, the tendons inspected during the previous surveillance shall be examined to determine whether the corrosion levels or concrete cracking have increased since the previous surveillance. Inspection of adjacent concrete surfaces shall be performed concurrently with the containment tendon surveillance (Technical Specification 4.6.1.6.1).
- 4.6.1.6.3 <u>Containment Surfaces</u>. In accordance with the Containment Leakage Rate Testing Program, a visual inspection of the accessible interior and exterior surfaces of the containment, including the liner plate, shall be performed. The purpose of this inspection shall be to identify any evidence of structural deterioration which may affect containment structural integrity or leaktightness. The visual inspection shall be general in nature; its intent shall be to detect gross areas of widespread cracking, spalling, gouging, rust, weld degradation, or grease leakage. The visual examination may include the utilization of binoculars or other optical devices. Corrective actions taken, and recording of structural deterioration and corrective actions, shall be in accordance with the Containment Leakage Rate Testing Program. Records of previous inspections shall be reviewed to verify no apparent changes in appearance. The first inspection performed will form the baseline for future surveillances.

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PROCEDURES AND PROGRAMS (Continued)

- 9. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- 10. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

g. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

h. Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50. Appendix J, Option B, and as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by the following deviations or exemptions:

- Type A tests will be performed either in accordance with Bechtel Topical Report BN-TOP-1, Revision 1, dated November 1, 1972, or the guidelines of Regulatory Guide 1.163.
- 2) A vacuum test will be performed in lieu of a pressure test for airlock door seals at the required intervals (Amendment Nos. 73 and 77, issued by NRC November 11, 1981).

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 49.9 psig.

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PROCEDURES AND PROGRAMS (Continued)

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.25% of containment air weight per day.

Leakage Rate acceptance criteria are:

- 1) The As-found containment leakage rate acceptance criterion is $\leq 1.0~L_a$. Prior to increasing primary coolant temperature above 200°F following testing in accordance with this program or restoration from exceeding 1.0 L_a , the As-left leakage rate acceptance criterion is $\leq 0.75~L_a$, for Type A test.
- The combined leakage rate for all penetrations subject to Type B or Type C testing is as follows:
 - The combined As-left leakage rates determined on a maximum pathway leakage rate basis for all penetrations shall be verified to be less than 0.60 L_a , prior to increasing primary coolant temperature above 200°F following an outage or shutdown that included Type B and Type C testing only.
 - The As-found leakage rates, determined on a minimum pathway leakage rate basis, for all newly tested penetrations when summed with the Asleft minimum pathway leakage rate leakage rates for all other penetrations shall be less than 0.6 L_a , at all times when containment integrity is required.
- 3) Overall air lock leakage acceptance criteria is \leq 0.05 L_a , when pressurized to P_a .

The provisions of Specification 4.0.2 do not apply to the test frequencies contained within the Containment Leakage Rate Testing Program.

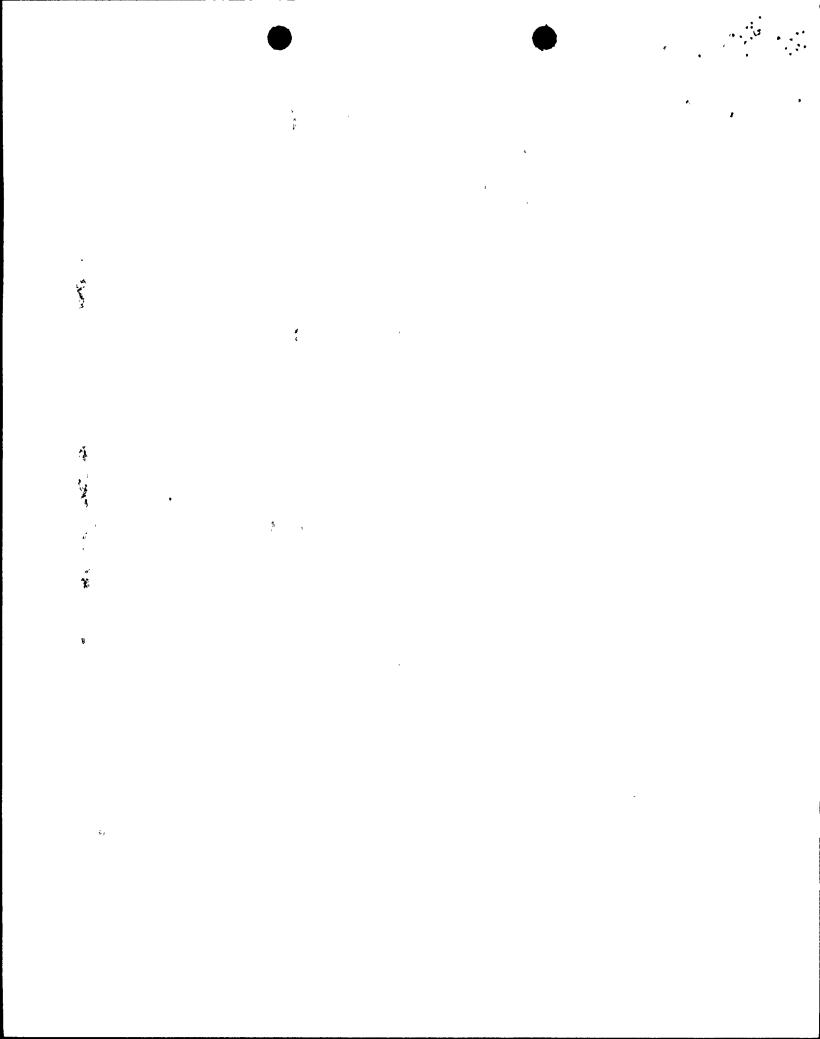
6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC pursuant to 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.



STARTUP REPORT (Continued)

The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions of characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report. Subsequent Startup Reports shall address startup tests that are necessary to demonstrate the acceptability of changes and/or modifications.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS*

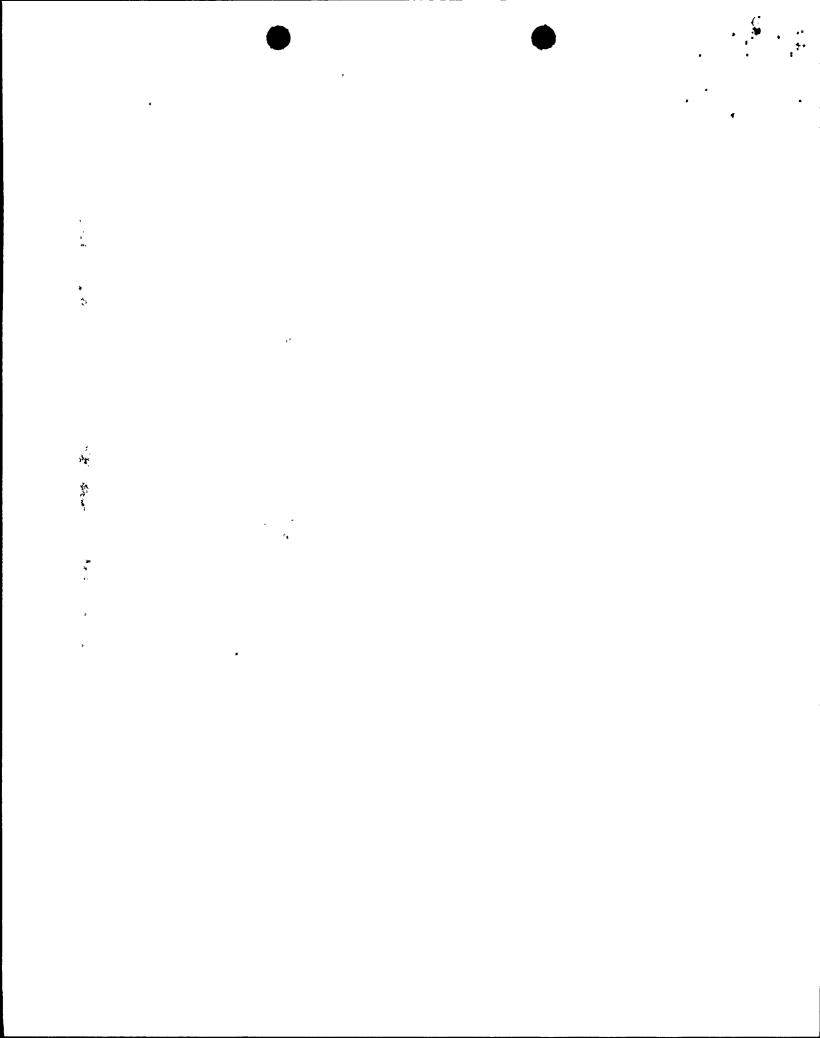
6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year.

Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was required, receiving annual deep dose equivalent exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions** (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions:
- b. The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Fuel burnup by core region; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) History of degassing operations, if any, starting 48 hours prior to the first sample in which the limit was exceeded; and (5) The time duration when the specific activity of the primary coolant exceeded 1.0 microcurie per gram DOSE EQUIVALENT I-131.

^{*}A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{**}This tabulation supplements the requirements of § 20.2206 of 10 CFR Part 20.



ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.3 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the Offsite Dose Calculation Manual (ODCM), and in (2) 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

6.9.1.4 RADIOACTIVE EFFLUENT RELEASE REPORT**

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

MONTHLY OPERATING REPORTS

6.9.1.5 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

^{*}A single submittal may be made for a multiple unit station.

^{**}A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

PEAKING FACTOR LIMIT REPORT

6:9.1.6 The W(Z) function(s) for Base-Load Operation corresponding to a $\pm 2\%$ band about the target flux difference and/or a $\pm 3\%$ band about the target flux difference, the Load-Follow function $F_Z(Z)$ and the augmented surveillance turnon power fraction, P_T , shall be provided to the U.S. Nuclear Regulatory Commission, whenever P_T is <1.0. In the event, the option of Baseload Operation (as defined in Section 4.2.2.3) will not be exercised, the submission of the W(Z) function is not required. Should these values (i.e., W(Z), $F_Z(Z)$ and P_T) change requiring a new submittal or an amended submittal to the Peaking Factor Limit Report, the Peaking Factor Limit Report shall be provided to the NRC Document Control desk with copies to the Regional Administrator and the Resident Inspector within 30 days of their implementation, unless otherwise approved by the Commission.

The analytical methods used to generate the Peaking Factor limits shall be those previously reviewed and approved by the NRC. If changes to these methods are deemed necessary they will be evaluated in accordance with 10 CFR 50.59 and submitted to the NRC for review and approval prior to their use if the change is determined to involve an unreviewed safety question or if such a change would require amendment of previously submitted documentation.

CORE OPERATING LIMITS REPORT

6.9.1.7 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT (COLR) before each reload cycle or any remaining part of a reload cycle for the following:

- 1. Axial Flux Difference for Specification 3.2.1.
- 2. Control Rod Insertion Limits for Specification 3.1.3.6.
- 3. Heat Flux Hot Channel Factor $F_0(Z)$ for Specification 3/4.2.2.
- 4. All Rods Out position for Specification 3.1.3.2.
- 5. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3

The analytical methods used to determine the AFD limits shall be those previously reviewed and approved by the NRC in:

- 1. WCAP-10216-P-A, "RELAXATION OF CONSTANT AXIAL OFFSET CONTROL F_Q SURVEILLANCE TECHNICAL SPECIFICATION," June 1983.
- 2. WCAP-8385, "POWER DISTRIBUTION CONTROL AND LOAD FOLLOWING PROCEDURES TOPICAL REPORT," September 1974.

The analytical methods used to determine $F_Q(Z)$, $F_\Delta H$ and the K(Z) curve shall be those previously reviewed and approved by the NRC in:

- 1. WCAP-9220-P-A, Rev. 1, "Westinghouse ECCS Evaluation Model 1981 Version," February 1982.
- 2. WCAP-9561-P-A, ADD. 3, Rev. 1, "BART A-1: A Computer Code for the Best Estimate Analysis of Reflood Transients Special Report: Thimble Modeling W ECCS Evaluation Model."
- 3. WCAP-10054-P-A, (proprietary), "Westinghouse Small Break ECCS Evaluation Model Using the NOTRUMP Code", August 1985.

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- 4. WCAP-10054-P, Addendum 2, Revision 1 (proprietary), "Addendum to the Westinghouse Small Break ECCS Evaluation Model Using the NOTRUMP . Code: Safety Injection in the Broken Loop and Improved Condensation Model", October 1995.*
- 5. WCAP-10266-P-A, Rev 2 (proprietary), and WCAP-11524-NP-A, Rev 2 (non-proprietary), "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code," May 1988.
- 6. NTD-NRC-94-4143, "Change in Methodology for Execution of BASH Evaluation Model," May 23, 1994.

The analytical methods used to determine Rod Bank Insertion Limits and the All Rods Out position shall be those previously reviewed and approved by the NRC in:

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

The ability to calculate the COLR nuclear design parameters are demonstrated in:

1. Florida Power & Light Company Topical Report NF-TR-95-01, "Nuclear Physics Methodology for Reload Design of Turkey Point & St. Lucie Nuclear Plants".

Topical Report NF-TR-95-01 was approved by the NRC for use by Florida Power & Light Company in:

1. Safety Evaluation by the Office of Nuclear Reactor Regulations Related to Amendment No. 174 to Facility Operating License DPR-31 and Amendment No. 168 to Facility Operating License DPR-41, Florida Power & Light Company Turkey Point Units 3 and 4, Docket Nos. 50-250 and 50-251.

The AFD, $F_Q(Z)$, $F_\Delta H$, K(Z), and Rod Bank Insertion Limits shall be determined such that all applicable limits of the safety analyses are met. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector, unless otherwise approved by the Commission.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report as stated in the Specifications within Sections 3.0, 4.0, or 5.0.

^{*}This reference is only to be used subsequent to NRC approval.

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6.10 RECORD RETENTION

- 6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.
- 6.10.2 The following records shall be retained for at least 5 years:
 - a. Records and logs of unit operation covering time interval at each power level:
 - Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
 - c. All REPORTABLE EVENTS:
 - d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;
 - e. Records of changes made to the procedures required by Specification 6.8.1;
 - f. Records of radioactive shipments;
 - g. Records of sealed source and fission detector leak tests and results; and
 - h. Records of annual physical inventory of all sealed source material of record.
- 6.10.3 The following records shall be retained for the duration of the unit Operating License:
 - a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
 - b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
 - c. Records of facility radiation and contamination surveys;
 - d. Records of radiation exposure for all individuals entering radiation control areas:
 - e. Records of gaseous and liquid radioactive material released to the environs:
 - f. Records of transient or operational cycles for those unit components identified in Table 5.7-1;
 - g. Records of reactor tests and experiments;
 - h. Records of training and qualification for current members of the facility staff;

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RECORD' RETENTION (Continued)

- Records of inservice inspections performed pursuant to these Technical Specifications;
- j. Records of quality assurance activities required for the duration of the unit Operating License by the Quality Assurance Manual;
- k. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- Records of meetings of the PNSC and the CNRB;
- m. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.6 including the date at which the service life commences and associated installation and maintenance records:
- n. Records of secondary water sampling and water quality; and
- o. Annual Radiological Environmental Operating Reports and records of analyses transmitted to the licensee which are used to prepare the Annual Radiological Environmental Operating Report.
- p. Records for Environmental Qualification which are covered under the provisions of 10 CFR 50.49.
- q. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 20.1601(c) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mrem/hr at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

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HIGH RADIATION AREA (Continued)

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Shift Supervisor in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 in.) and less than 500 rads/hr at 1 meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift supervisor on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mrem/hr and less than 500 rads/hr that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The Process Control Program (PCP) shall contain the current formulas, sampling, analyses, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

PROCESS CONTROL PROGRAM (Continued)

6.13.2 Licensee-initiated changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3q. This documentation shall contain:
 - Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the PNSC and the approval of the Plant General Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall contain the following:

- a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program; and
- b. The radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Annual Radioactive Effluent Release Reports required by Specification 6.9.1.3 and Specification 6.9.1.4.

6.14.2 Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by specification 6.10.3q. This documentation shall contain: :
 - 1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - 2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after the review and acceptance by the PNSC and approval of the Plant General Manager; and

OFFSITE DOSE CALCULATION MANUAL (ODCM) (Continued)

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.