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AUTH.NAME AUTHOR AFFILIATION
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, requesting rev to allow Unit 3 diesel fuel oil storage tank to be drained,inspected & cleaned while maintaining at least one Unit 3 diesel operable.

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FPL

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L-96-210
10 CFR §50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Diesel Fuel Storage System

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, to allow the Unit 3 diesel fuel oil storage tank to be drained, inspected and cleaned while maintaining at least one Unit 3 diesel operable.

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 and justification 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,

R. J. Hovey
Vice President
Turkey Point Plant

JEK

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

A001

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

R. 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.

R. J. Hovey

Subscribed and sworn to before me this

22 day of November, 1996.

James E. Knorr

Name of Notary Public (Type or Print)

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

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

R. J. Hovey is personally known to me.

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

DESCRIPTION AND PURPOSE

Florida Power and Light Company (FPL) is requesting that Appendix A of Facility Operating Licenses DPR-31 and DPR-41, for Turkey Point Units 3 and 4 respectively, be revised to allow for the installation of a temporary fuel oil storage and transfer system in order to maintain operability of a Unit 3 Emergency Diesel Generator (EDG) during performance of a required surveillance. Technical Specification surveillance requirement 4.8.1.1.2i.1 requires draining and cleaning the diesel fuel oil storage tank every ten years on Unit 3. Under the existing Technical Specifications, draining the Unit 3 diesel fuel oil storage tank will render 3A EDG and 3B EDG inoperable. Technical Specification sections 3.8.1.1b and 3.8.1.2b require "A common Fuel Storage System containing a minimum volume of 38,000 gallons of fuel." A temporary fuel storage and transfer system will be in place during tank maintenance to provide fuel to Unit 3 EDGs if required. Although the temporary storage and transfer system will not meet the requirements for Seismic Category I or Class 1E, the EDG support function of fuel storage and transfer will remain fully functional during normal operation. Operability of the Unit 3 EDGs will be based upon availability of a temporary fuel storage and transfer system. In the unlikely event of a seismic event, the ability to provide fuel to the EDGs will not be compromised because the installed piping and connection points, for filling the Unit 3 EDGs' day tanks from tanker trucks, are seismically installed.

Changes are proposed to revise Turkey Point Units 3 and 4 Technical Specifications Section 3/4.8.1.1 and 3/4.8.1.2 to add a note to 3.8.1.1.b, 3.8.1.1.c, 4.8.1.1.2i.1, 3.8.1.2.b.2, and 3.8.1.2.b.3 that during the performance of Surveillance Requirement 4.8.1.1.2i.1 the use of a temporary diesel fuel oil storage and transfer system is allowed in leu of the permanently installed storage system.

The proposed note about Surveillance Requirement 4.8.1.1.2i.1 will allow the use of a temporary system for storage and delivery of at least a seven day supply of diesel fuel for one Unit 3 EDG. The capability of this temporary system to deliver fuel will maintain the operability of the EDG for ten days. With the proposed Technical Specification amendment in place, if ten days of operation are exceeded using the temporary fuel storage system, action statements for an inoperable but required Unit 3 EDG will require the shutdown of Unit 4 to Mode 5, and suspension of the Unit 3 refueling process. This temporary fuel oil storage system will provide for operability of any EDG normally fed from the Unit 3 fuel oil storage system while the normal diesel fuel storage tank is having its accumulated sediment removed and is being cleaned and or repaired. This note is expected to apply only once every 10 years during the performance of Surveillance Requirement 4.8.1.1.2i.1.

The design of the temporary storage system and delivery system will be evaluated by FPL, such that adequate measures will be taken to ensure the integrity and efficacy of the system.

BACKGROUND

The Unit 3 EDGs obtain their fuel from one tank, which is required to contain a minimum volume of 38,000 gallons of fuel. Each 10 years the tank is required by surveillance 4.8.1.1.2i.1 to be drained, have any accumulated sediment removed and be cleaned. The current action statements for Technical Specification 3.8.1.1 and 3.8.1.2 do not provide for removal of the tank from service while maintaining Unit 4 on line and continuing the refueling process for Unit 3. Technical Specifications, as written, allow the Unit 3 tank to have Surveillance Requirement 4.8.1.1.2i.1 performed, if Unit 3 is placed in Mode 5 or 6 and other fuel movement restrictions and reactor coolant system configurations are maintained. Additionally, if the tank cleaning takes longer than 72 hours Unit 4 would have to be placed in Mode 5. Under the existing Technical Specifications, both Unit 3 EDGs would be considered inoperable if the installed diesel fuel tank were empty for cleaning. The cleaning operation is expected to take approximately 100 hours assuming no repairs to the tank are needed. The day tank attached to each Unit 3 EDG contains enough fuel to run the EDG 17 hours. To maintain operability of the EDGs during the 4.8.1.1.2i.1 surveillance of the storage tank, FPL proposes to install a temporary tank and associated pump to the auxiliary fill system for the Unit 3 EDGs. An additional supply will be maintained on site to provide a minimum 38,000 gallon supply for the operable Unit 3 EDG. Manual action would be required to provide an uninterrupted supply of fuel to the EDG. Any manual actions can easily be accomplished in the 17 hours provided by the capacity of each day tank. These manual actions will be described in a procedure and operators trained in the processes required.

An installed system also exists which allows the feeding of the Unit 3 EDG day tanks from the Unit 4 EDG fuel oil storage tanks. This system could be used if either the failure of the temporary supply occurs or access to the auxiliary fill line to the Unit 3 EDG day tanks becomes unavailable. This configuration could also provide an uninterrupted supply to the Unit 3 EDGs by way of refilling the Unit 4 tanks when needed from usual tanker trailers.

DISCUSSION AND DESCRIPTION OF PROPOSED CHANGES

The existing Technical Specifications state in part:

> TS 3.8.1.1 ACTION b. now requires that "With one of the required diesel generators inoperable, ... Restore the inoperable diesel generator to OPERABLE status within 72 hours or be in HOT STANDBY in the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

TS SURVEILLANCE REQUIREMENT 4.8.1.1.2. requires that "Each diesel generator shall be demonstrated OPERABLE:

I. At least once every 10 years by:

1) Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank."

TS 3.8.1 AC SOURCES

SHUTDOWN

TS 3.8.1.2 ACTION STATEMENT now requires that "With less than the above minimum required A.C. electrical power sources OPERABLE, immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, movement of irradiated fuel, or crane operation with loads over the fuel storage pool, and within 8 hours, depressurize and vent the Reactor Coolant System through a greater than or equal to 2.2 square inch vent."

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

TS 3.8.1 AC SOURCES

OPERATING

REVISE TS 3.8.1.1.b, 3.8.1.1.c, 4.8.1.1.2i.1 (Surveillance Requirement,) to add a note:

"* A temporary fuel storage system may be used for up to 10 days during the performance of Surveillance Requirement 4.8.1.1.2i.1 for the Unit 3 storage tank."

TS 3.8.2 AC SOURCES

SHUTDOWN

REVISE TS 3.8.1.2.b.2, 3.8.1.2.b.3, to add a note:

"* A temporary fuel storage system may be used for up to 10 days during the performance of Surveillance Requirement 4.8.1.1.2i.1 for the Unit 3 storage tank."

With unit 4 operating in Mode 1, 2, 3, or 4, and Unit 3 in Mode 5 or 6, only one Unit 3 EDG is required to be OPERABLE for both units to maintain that status indefinitely. With Unit 4 in Mode 1, 2, 3, or 4, the Technical Specifications now provide an allowed outage time of 72 hours for the cleaning of the Unit 3 fuel oil storage tank. With Unit 3 in Mode 5 or 6, the Technical Specifications require immediate corrective actions to restore the required AC source to OPERABLE status and take the other additional actions described in the ACTION statement. In summary, under the existing Technical Specifications, with the Unit 3 fuel oil storage tank undergoing its required 10 year cleaning and inspection and the skid mounted and day tanks for one Unit 3 EDG having

at least 2000 gallons of fuel oil, the one required Unit 3 EDG would be considered inoperable for Unit 3 (in Mode 5 or 6) and inoperable for Unit 4 (in Mode 1, 2, 3, or 4).

Therefore, FPL requests to revise the Turkey Point Unit 3 and 4 TS to allow a temporary fuel storage system to be used for a period of up to 10 days, to maintain a Unit 3 EDG OPERABLE, during Unit 4 operation in Mode 1, 2, 3, or 4, and Unit 3 in Mode 5 or 6. This should only apply once every 10 years during the performance of Surveillance Requirement 4.8.1.1.2i.1.

Justification:

System description:

The Emergency Power System (EPS) provides emergency power to Turkey Point Units 3 and 4 station loads to support a safe and orderly shutdown as well as continued removal of decay heat under the following circumstances:

- Normal operating modes.
- Loss of offsite power.
- Design basis accident on one unit requiring mitigation of accident conditions and subsequent safe shutdown of the unit, together with achieving and maintaining the non-accident unit in hot shutdown condition.
- Postulated fires requiring shutdown of the units with or without availability of offsite power.
- 10 CFR 50.63 Station Blackout events.

Independent offsite and onsite power sources for each unit are provided. These alternate power sources have adequate capacity to supply power to safe shutdown loads as required.

Each unit is provided with two offsite sources of power. One offsite source for each unit, an independent 240kv overhead feeder from the switchyard, feeds the 4.16 kv "A" and "B" busses through an associated dual-secondary startup transformer. The other offsite source is a 4.16 kv feeder from the adjacent unit's startup transformer to the 4.16 kv "A" bus. This alternate feed is capable of supporting loads necessary for achieving and maintaining safe shutdown of the unit it feeds. The switchyard consists of nine bays arranged in a breaker-and-a-half configuration with a tie breaker in each of the two main busses. The switchyard is shared between two Turkey Point fossil units and two Turkey Point nuclear units, and is connected to the FPL transmission system by eight 240 kv power lines. Thus, station service power is supplied to each unit by multiple sources. Each startup transformer has the capability of being connected to different 240 kv buses in the switchyard. In the event of a 240 kv bus fault, at least one startup transformer could be quickly restored to service. Normally, a bus fault will result in the loss of only one startup transformer, because of

switchyard logic devices that will prevent the loss of both transformers from a single event.

Four onsite EDGs are provided, with two dedicated to each unit. Although dedicated to a specific unit each supplies loads which are common to both units, e.g., safety injection pumps, vital DC battery chargers. The "A" EDGs feed the "A" 4.16 kv buses and the "B" EDGs feed the "B" 4.16 kv buses of their respective units. The 4.16 kv "D" bus of each unit is a swing bus which can be powered by either of its respective 4.16 kv "A" or "B" buses.

The EPS configuration provides the ability to cross-tie any EDG to either train of the opposite unit. This can be done at the 4.16 kv switch gear level from the control room during a 10 CFR 50.63 Station Blackout (SBO) event. Adequate EDG capacity exists for any single EDG to power loads necessary to maintain both units in Hot Standby.

The diesel generator fuel system is designed to provide fuel oil storage capacity for at least seven days of accident load operation of one emergency diesel generator set and maintain fuel supply to at least one diesel generator set, assuming a single active failure.

Unit 3 diesel fuel oil is stored in a common 64,000 gallon diesel fuel oil storage tank. This tank, designed to Class I structural requirements, has sufficient capacity to permit one diesel generator set to operate at 2950 KW for at least seven days without replenishing. Filling the tank is accomplished by a connection designed for delivery trucks. The storage tank supplies fuel oil to separate 4000 gallon day tanks for each diesel engine. This day tank has enough fuel to operate the EDG at rated capacity for approximately 17 hours. Transfer from the fuel oil storage tank to the day tank is accomplished automatically by one of two electric motor driven pumps. Each transfer pump is normally aligned to supply its own day tank. However, a cross-tie on discharge piping allows use of the other pump. Each day tank is elevated with respect to its associated engine and gravity feeds a 275 gallon skid mounted tank. During operation, fuel from the skid tank is pumped to the engine by fuel pumps.

If the fuel supply from the fuel oil storage tank is stopped due to damage or loss of power to transfer pumps, alternate fuel supply pipes located outside the Unit 3 EDG building allow for filling of the day tanks from mobile fuel trucks. Additionally, Unit 4 transfer pumps are cross-tied and can supply each Unit 3 day tank from the two Unit 4 diesel oil storage tanks.

Unit 4 diesel fuel oil is stored in two separate 42,000 gallon diesel oil storage tanks. These tanks are located inside, and are integral to, the building housing the Unit 4 EDGs. Each tank has sufficient capacity for continuous operation of one Unit 4 EDG for more than seven days at rated capacity. Filling is accomplished by an external connection for delivery trucks. Both the Unit 3 and Unit 4 fuel oil storage tanks can be filled from the external fill station at the opposite unit's EDG building fill station.

Each Unit 4 fuel oil storage tank supplies fuel oil to separate 650 gallon day tanks. These day tanks supply adequate fuel oil for the EDG to run at full rated capacity for 3 hours. Transfer from the main tank to the day tanks is accomplished automatically by two positive displacement pumps. Each pump is normally aligned to its own day tank. However, cross-ties on discharge and suction piping allow the use of either pump and/or tank.

During Unit 3 fuel oil storage tank cleaning, a single Unit 3 EDG will be available for operation. Each Unit 3 EDG will have diesel fuel available through its day tank, skid mounted tank and additional temporary storage tanks. A minimum of 38000 gallons of fuel will be available within the owner controlled area of Turkey Point to ensure compliance with the intent of Technical Specifications 3.8.1.1b and 3.8.1.2b.

Temporary Fuel Storage System

The temporary storage system will consist of at least one tank with a minimum capacity of 7000 gallons, connected to the alternate fuel supply line outside the Unit 3 EDG rooms. Additional tanks will store remaining fuel. Storage tanks will not meet the requirements for Seismic Category I. Additional fuel will be controlled and monitored within the owner controlled area. Monitoring of fuel quality will be in accordance with existing plant procedures to assure compliance with diesel fuel specifications. A temporary fuel transfer system will be designated and in place to allow make up from temporary tanks to the day tank in the event EDG operation is required. This transfer system will not be powered by existing plant Class 1E power supplies. Measures (procedures and training) will be in place to move additional tanks into position, to transfer additional fuel into the temporary tank and to transfer fuel as needed into the day tanks.

The temporary storage and transfer system will not meet requirements for Seismic Category I or Class 1E. The day and skid tanks will have at least 3680 gallons and 200 gallons respectively, prior to taking the permanent storage tank out of service. This will provide approximately 17 hours of operation based on current Unit 3 EDG full load requirements, thus providing adequate time for set up and operation of temporary fuel system. Should the temporary storage/transfer system become separated due to damage or loss of power, alternate fuel supply pipes located outside both Units' EDG buildings allow filling of the available Unit 3 EDG's day tank from mobile fuel trucks. The connection points for the temporary fuel oil storage system are permanently installed original equipment. The temporary delivery system will be installed to this connection which leads directly to the Unit 3 day tanks and does not use the installed fuel oil transfer pump.

SUMMARY

The proposed addition of a note to Turkey Point Technical Specification (TS) 4.8.1.1.2i.1. will enable Unit 4 to remain on line and Unit 3 to continue refueling operations for up to 10 days during the performance

of Surveillance Requirement 4.8.1.1.2i.1. Without the change Unit 4 would have to be shut down to Mode 5 or 6 and Unit 3 would have to discontinue refueling operations to perform the Required Surveillance since the time required to empty, inspect, remove accumulated sediment, repair as needed and refill the tank will exceed 72 hours.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DESCRIPTION OF PROPOSED LICENSE AMENDMENTS

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41, for Turkey Point Units 3 and 4 respectively, be revised to add a note to Surveillance Requirement 4.8.1.1.2i.1. The note will allow the use of a temporary fuel oil storage system to maintain an operable Emergency Diesel Generator (EDG) for up to 10 days. The use of the temporary system to maintain operability is proposed to apply only during the performance of Surveillance Requirement 4.8.1.1.2i.1. once every 10 years. The purpose of the use of a temporary fuel oil storage system is to enhance overall plant safety by averting potential unnecessary plant shutdowns, and by providing for increased flexibility in scheduling and performing maintenance and surveillance activities.

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 amendment will allow the installation of a temporary fuel oil storage and transfer system for up to 10 days, on a once every 10 years frequency. EDGs are designed as backup A/C power sources for essential safety systems in the event of a loss of offsite power. Since the EDGs are not accident initiators, the probability of occurrence of accidents previously analyzed has not been increased.

The proposed amendment will not change the condition or minimum amount of operating equipment assumed in the plant safety analyses for accident mitigation. The temporary fuel supply system and storage provides a reliable means of performing the required delivery support function for the Unit 3 EDGs.

A slight but insignificant increase in the consequences of an accident previously evaluated is possible since the temporary

storage and transfer system will not meet requirements for Seismic Category I or Class 1E.

The probability of a seismic event will be very low due to the limited time that the temporary storage system will be in use. Requirements for a containment system around the temporary storage system has been evaluated for potential locations for the system. The conclusion of this evaluation was that the increase in the probability or consequences of the temporary storage system installation without a containment system will not be significant. It should be noted that some options being considered include tanks with containments already built around them or the use of double-walled tanks.

The potential locations of the temporary storage tanks will be evaluated for the need to enhance temporary fire protection measures. These measures would ensure that there would not be a significant increase in the probability or consequences of a fire previously evaluated.

The increase in the consequences of an accident previously evaluated is insignificant due to the following:

The day and skid tanks will have at least 3680 gallons and 200 gallons respectively, and the temporary fuel storage system will be installed prior to taking the permanent storage tank out of service. This will provide approximately 17 hours of operation based on current Unit 3 EDG full load requirements, thus providing adequate time for set up and operation of temporary fuel system. Should the temporary storage/transfer system become separated due to damage or loss of power, alternate fuel supply pipes located outside both Units' EDG building allow filling of the available Unit 3 EDG's day tank from mobile fuel trucks. The connection points for the temporary fuel oil storage system are permanently installed original equipment. The temporary delivery system will be installed to this connection which leads directly to the Unit 3 day tanks and does not use the installed fuel oil transfer pump.

Additionally, Unit 4 transfer pumps can be cross-tied and can supply each Unit 3 day tank from the two Unit 4 diesel fuel oil storage tanks.

The permanent EDG day tank provides sufficient fuel capacity to ensure that adequate time is available to operate the temporary system.

Consequently, operation of the facility in accordance with the proposed amendment would not involve a significant increase in 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 proposed amendment will not change the physical plant or modes of plant operation defined in the Turkey Point Units 3 and 4 operating license. The proposed amendment will not involve addition or modification of permanent equipment for Unit 3 EDG fuel storage and transfer.

Due to the use of the following temporary fuel oil storage system this amendment will not create the possibility of a new or different kind of accident (including fire) from any accident previously evaluated.

The temporary storage system will consist of at least one tank with a minimum capacity of 7000 gallons, connected to the alternate fuel supply line outside the Unit 3 EDG building. Additional tanks will store remaining fuel. Storage tanks will not meet the requirements for Seismic Category I. However, as discussed above, the permanent EDG day tank supplies sufficient fuel capacity to provide, in the unlikely event of a seismic event, for adequate time to operate the temporary system.

Additional fuel will be controlled and monitored within the owner controlled area. Monitoring of fuel quality will be in accordance with existing plant procedures to assure compliance with diesel fuel specifications. A temporary fuel transfer system will be designated and in place to allow make up from temporary tanks to the day tank in the event EDG operation is required. This transfer system will not be powered by existing plant Class 1E power supplies. Measures will be in place to move additional tanks into position, to transfer additional fuel into the temporary tank and to transfer fuel as needed into the day tanks. Additionally, Unit 4 transfer pumps are cross-tied and can supply each Unit 3 day tank from the two Unit 4 diesel fuel oil storage tanks.

Measures will be taken to ensure that there would not be a significant increase in the probability or consequences of a fire previously evaluated.

Therefore, the temporary fuel storage and transfer system will provide a reliable means of performing the required delivery support function for the Unit 3 EDGs.

Also, the Unit 3 EDG day tank capacity provides adequate time for operators to mitigate the effects of postulated design basis events, i.e., earthquakes, by use of the cross ties and/or the temporary systems described.

Consequently, operation of either unit in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed amendment is designed to provide flexibility to schedule and perform required surveillance activities. Surveillance intervals or operating requirements are not changed by the proposal; only the method of fuel oil storage on a temporary basis for a single operable EDG is addressed. The proposed change will not alter the basis for any Technical Specification that is related to the establishment of, or maintenance of, a nuclear safety margin.

Consequently, operation of Turkey Point Units 3 and 4 in accordance with this proposed amendment would not involve a significant reduction in a margin of safety.

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.