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 HOVEY, R.J.      Florida Power & Light Co.  
 RECIP.NAME      RECIPIENT AFFILIATION  
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SUBJECT: Revised application for amends to licenses DPR-31 & DPR-41,  
 replacing entirety, proposed license amends request submitted  
 to NRC by util ltr L-96-210. Attachment 4 provides response  
 to 970716, NRC questions.

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FEB 02 1998

L-98-012  
10 CFR 50.90

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

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Revised Proposed License Amendments and  
Request for Additional Information (RAI) -  
Diesel Fuel Storage Systems  
(TAC Nos. M97376 and M97377)

By letter L-96-210, dated November 22, 1996, in accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) submitted a request to amended Appendix A of Facility Operating Licenses DPR-31 and DPR-41, the Turkey Point Units 3 and 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 Emergency Diesel Generator (EDG) operable. By NRC letter dated July 16, 1997, the staff requested additional information to support the technical review of the proposed license amendments. Attachment 4 provides the response to the July 16, 1997, NRC questions.

FPL has improved the proposed license amendments request submitted by letter L-96-210. The proposed license amendments' request submitted by letter L-96-210 credited the installation of a temporary tank and associated pump to the auxiliary fill system for the Unit 3 EDGs. The change from the L-96-210 submittal is crediting the availability of extra fuel capacity in the two Unit 4 EDG diesel fuel oil storage tanks (above the minimum required Technical Specification capacity of 34,700 gallons) to the operable Unit 3 EDG. In addition, three temporary diesel fuel oil storage tanks and one mobile tanker will be staged outside the power block, inside the protected area. A revised proposed license amendments request reflecting these changes is included in Attachments 1, 2, and 3. The revised submittal replaces, in its entirety, the proposed license amendments request submitted to the NRC by FPL letter L-96-210. //

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. ADD 1

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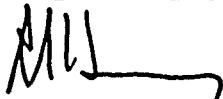
Page 2

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, please contact us.

Very truly yours,



R. J. Hovey  
Vice President  
Turkey Point Plant

Attachments

OIH

cc: L. A. Reyes, Regional Administrator, Region II, USNRC  
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey  
Point  
W. A. Passetti, Florida Department of Health and  
Rehabilitative Services

Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Revised Proposed License Amendments and  
Request for Additional Information (RAI) -  
Diesel Fuel Storage Systems  
(TAC Nos. M97376 and M97377)

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;

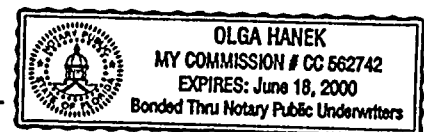
That he has executed the foregoing document; that the statements  
made in this document are true and correct to the best of his  
knowledge, information and belief, and that he is authorized to  
execute the document on behalf of said Licensee.

  
R. J. Hovey

Subscribed and sworn to before me this

2<sup>ND</sup> day of February, 1998.

Olga Hanek  
Olga Hanek  
Name of Notary Public (Type or Print)



R. J. Hovey is personally known to me.

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## 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 EDG diesel fuel oil storage tank every ten years on Unit 3. Under the existing Technical Specifications, draining the Unit 3 EDG 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 excess fuel in Unit 4 diesel fuel oil storage tanks and 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, used for filling the Unit 3 EDG day tanks from a tanker truck, are seismically qualified.

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.1b, 3.8.1.1.b.1c, 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 lieu of the permanently installed storage and transfer system.

The proposed note for Surveillance Requirement 4.8.1.1.2i.1 will allow the use of a temporary system for storage and delivery of at least a 7 day supply of diesel fuel for one Unit 3 EDG. The capability of this temporary system to deliver fuel will be available for a period of 10 days to maintain the operability of the Unit 3 EDGs. Ten days is a conservative estimate of time required for the tank cleaning evolution. With the proposed



Technical Specification amendment in place, if 10 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, 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 out of service. 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 was evaluated by FPL, such that adequate measures will be taken to ensure the integrity and efficiency 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, any accumulated sediment removed, and 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 ultimately 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 and skid tank attached to each Unit 3 EDG have sufficient capacity to run the EDG for 17 hours. FPL proposes to stage, outside the power block, a minimum 38,000 gallon temporary fuel oil supply to maintain operability of the EDGs during the 4.8.1.1.2i.1 surveillance of the storage tank. 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 the day tank and skid tank. These manual actions will be described in a procedure and operators will be 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 storage tanks when needed from 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 are proposed below and attached herein:

#### TS 3.8.1 AC SOURCES

##### OPERATING

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

- "\* A temporary Class III fuel storage system containing a minimum volume of 38,000 gallons of fuel oil 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 while Unit 3 is in Modes 5, 6, or

defueled. If the diesel fuel oil storage tank is not returned to service within 10 days, Technical Specification 3.8.1.1 Action b and 3.8.1.2 Action apply to Unit 4 and Unit 3 respectively."

TS 3.8.2 AC SOURCES

SHUTDOWN

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

- "\* A temporary Class III fuel storage system containing a minimum volume of 38,000 gallons of fuel oil 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 while Unit 3 is in Modes 5, 6, or defueled. If the diesel fuel oil storage tank is not returned to service within 10 days, Technical Specification 3.8.1.1 Action b and 3.8.1.2 Action apply to Unit 4 and Unit 3 respectively."

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 existing Technical Specifications 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, 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 Units 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 operation in Mode 5 or 6. This temporary system should only be required once every 10 years during the performance of Surveillance Requirement 4.8.1.1.2i.1.

The Unit 3 diesel fuel oil storage tank would not be removed from service for cleaning with Unit 3 in Modes 1 through 4 (when TS Section 3.8.1.1.b applies). The tank would only be removed from service, with the use of a temporary storage system, with Unit 3 in Modes 5, 6, or defueled (when TS Section 3.8.1.2.b applies). Technical Specification 3.8.1.1.b and 3.8.1.2.b are satisfied by

having both the 4A and 4B EDGs operable in Modes 1 through 4 and either the 3A or 3B EDG operable in Modes 5 and 6 during the performance of Surveillance 4.8.1.1.2i.1 for up to 10 days.

**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 and 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 switchgear 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 7 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. The tank has sufficient capacity for continuous operation of one Unit 3 EDG for more than 7 days at rated capacity. 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. Each day tank can hold 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 either of 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 7 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 the Unit 3 fuel oil storage tank cleaning, a single Unit 3 EDG will be available for operation. The Unit 3 EDG will have diesel fuel available through its day tank, skid mounted tank and additional temporary storage tanks. A minimum of 38,000 gallons of fuel will be available outside the power block but inside the protected 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

FPL proposes to stage the temporary fuel oil supply outside the power block. This will be performed by staging three temporary stationary supply tanks, each having a capacity of approximately 19,000 gallons, and one mobile tanker inside the protected area in the vicinity of the Nuclear Plant Central Receiving Facility more than 1000 ft from the Unit 3 EDG building. The location of the temporary fuel oil storage supply away from the Unit 3 EDG building eliminates the need for additional fire protection features at the Unit 3 auxiliary fill station. Manual actions required to provide a 7 day supply of fuel to the EDGs can easily be accomplished in the 17 hours of EDG operation provided by the 3880 gallon capacity of a single EDG day and skid tank. The location of the temporary fuel oil supply inside the protected area security fence by the Central Receiving Facility provides multiple access routes to transfer fuel to the Unit 3 EDGs and is in close proximity to a severe weather shelter for the mobile tanker.

Additionally, more than 17 hours will be available to manually transfer fuel from the temporary fuel storage tanks located inside the protected area, by filling the Unit 4 EDG storage tanks with approximately 8600 gallons of fuel oil above that required for Unit 4 EDG operability. This extra capacity will be available to the Unit 3 EDGs prior to taking the permanent Unit 3 storage tank out of service. This will be done by filling the Unit 4 fuel tanks to 39,000 gallons, which is just below the high level alarm. This gives a capacity of 4300 gallons in each tank

above the Unit 4 Technical Specification minimum required volume of 34,700 gallons. The Unit 4 tanks are contained within a Seismic Class 1 structure and protected by installed fire protection equipment.

Combining the excess available fuel from the Unit 4 storage tanks and the nominal volume of the Unit 3 day and skid tanks gives a total of 12,480 gallons ( $4300 \times 2 + 3880$ ) of available fuel to either of the Unit 3 EDGs. This allows a run time for a Unit 3 EDG of 55 hours (assuming fuel oil transfer from Unit 4) prior to reaching the Technical Specification minimum volume for the Unit 4 fuel oil storage tanks. Manual actions to replenish the Unit 4 fuel oil storage tanks and the Unit 3 day tank and skid tank from the temporary storage tanks, via the mobile tanker, can easily be accomplished within the 55 hours. Procedures currently exist for the transfer of fuel from (1) the mobile tanker to the auxiliary fill station at the Unit 3 EDGs, and (2) from the Unit 4 EDG storage tanks to the Unit 3 day tanks by using either of the Unit 4 transfer pumps. The Unit 4 transfer pumps are powered from redundant Class 1E power supplies.

The temporary tanks will be located greater than fifty (50) feet from safety related or safe shutdown components or circuits. This does not produce any threat to fire protection or safe shutdown capability, and therefore represents a configuration that is bounded by existing fire hazards analysis.

A dedicated mobile tanker staged inside the protected area to transfer fuel from the temporary storage tanks to the permanent day/skid tank system. The mobile tanker will have an integral transfer pump to facilitate movement of fuel to either of the two truck fills at the Unit 4 EDG building or day tank truck fills (auxiliary fill station) at the Unit 3 EDGs. One truck fill at the Unit 4 EDG building supplies fuel to the 4A and 4B storage tanks, the other truck fill at the Unit 4 EDG building can provide fuel directly to the Unit 3 day tanks. This fuel supply will provide continued operation for 7 days. The temporary storage and transfer system will not meet requirements for Seismic Category I or Class 1E.

The proposed three temporary stationary tanks will be mobile trailer rectangular style tanks (43 feet long, 11 feet high, and 8 feet wide) having a capacity of approximately 19,000 gallons each. The tanks will be WORKSAFE™, or equivalent, Bi-Level steel tanks, with cross style internal bracing with an approximate empty weight of 21,000 lbs. The tanks when in place (disconnected from the transport tractor) would each have a footprint area of approximately 43 feet x 8 feet. These trailer/tanks are provided with tie-down capability and will be secured by temporary measures to withstand winds of at least 120 mph. If the above tanks are not available when required, others will be substituted and evaluated to meet equivalent criteria.

In the event of a hurricane, the mobile tanker along with hoses, portable pumps, filters, etc., would be garaged inside the onsite Central Receiving Facility which is designed to withstand winds of at least 120 mph. The excess Unit 4 EDG fuel oil storage capacity and the available fuel in the Unit 3 EDG day tanks is contained in buildings designed to protect against hurricanes, earthquakes, and missiles and therefore requires no additional protection from these hazards.

The capability to operate an Unit 3 EDG for 7 days during the tank cleaning evolution will be assured by an approved plant procedure that controls the following:

- A minimum fuel supply of 3880 gallons from the Unit 3 day and skid tanks. This provides 17 hours of operation.
- The extra fuel supply of 8600 gallons (4300 gallons each) in the two Unit 4 EDG tanks which will be transferred by using one of the installed Unit 4 transfer pumps. This provides an additional 38 hours of operation.
- Three temporary tanks containing a minimum fuel supply of 38,000 gallons. This fuel supply will provide continued operation for 7 days.

#### 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, clean, repair as needed, and refill the tank will exceed 72 hours.



## 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 to schedule and perform required 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, once every 10 years. EDGs are designed as backup AC 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 temporary fuel oil storage tanks will be located greater than fifty (50) feet from safety related or safe shutdown components or circuits. This does not produce any threat to fire protection or safe shutdown capability and therefore represents a configuration that is bounded by existing fire hazards analysis.

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 storage and transfer system provides a reliable means of performing the required delivery support function for the Unit 3 EDGs.

An 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. However, the probability of a seismic event will be very low due to the limited time that the temporary storage system will be in use.

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

Manual actions required to provide a 7 day supply of fuel to the EDGs can easily be accomplished in the 17 hours of EDG operation provided by the 3880 gallon capacity of a single EDG day and skid tank. The location of the temporary fuel oil supply inside the protected area security fence by the Central Receiving Facility provides multiple access routes to transfer fuel to the Unit 3 EDGs and is in close proximity to a severe weather shelter for the mobile tanker.

Additionally, more than 17 hours will be available to manually transfer fuel from the temporary fuel storage tanks located inside the protected area, by filling the Unit 4 EDG storage tanks with approximately 8600 gallons of fuel oil above that required for Unit 4 EDG operability. This extra capacity will be available to the Unit 3 EDGs prior to taking the permanent Unit 3 storage tank out of service. This will be done by filling the Unit 4 fuel tanks to 39,000 gallons, which is just below the high level alarm. This gives a capacity of 4300 gallons in each tank above the Unit 4 Technical Specification minimum required volume of 34,700 gallons. The Unit 4 tanks are contained within a Seismic Class 1 structure and protected by installed fire protection equipment.

Combining the excess available fuel from the Unit 4 storage tanks and the nominal volume of the Unit 3 day and skid tanks gives a total of 12,480 gallons ( $4300 \times 2 + 3880$ ) of available fuel to either of the Unit 3 EDGs. This allows a

run time for a Unit 3 EDG of 55 hours (assuming fuel oil transfer from Unit 4) prior to reaching the Technical Specification minimum volume for the Unit 4 fuel oil storage tanks. Manual actions to replenish the Unit 4 or Unit 3 fuel oil storage tanks from the temporary storage tanks, via the mobile tanker, can easily be accomplished within the 55 hours. Procedures currently exist for the transfer of fuel from (1) the mobile tanker to the auxiliary fill station at the Unit 3 EDGs, and (2) from the Unit 4 EDG storage tanks to the Unit 3 day tanks by using either of the Unit 4 transfer pumps. The Unit 4 transfer pumps are powered from redundant Class 1E power supplies.

The temporary storage tanks will be located inside the protected area in the vicinity of the Nuclear Plant Central Receiving Facility. The temporary tanks will be located greater than fifty (50) feet from safety related or safe shutdown components or circuits. This does not produce any threat to fire protection or safe shutdown capability and therefore represents a configuration that is bounded by existing fire hazards analysis.

A dedicated mobile tanker staged inside the protected area to transfer fuel from the temporary storage tanks to the permanent day/skid tank system. The mobile tanker will have an integral transfer pump to facilitate movement of fuel to either of the two truck fills at the Unit 4 EDG building or day tank truck fills (auxiliary fill station) at the Unit 3 EDGs. One truck fill at the Unit 4 EDG building supplies fuel to the 4A and 4B storage tanks, the other truck fill at the Unit 4 EDG building can provide fuel directly to the Unit 3 day tanks. This fuel supply will provide continued operation for 7 days. The temporary storage and transfer system will not meet requirements for Seismic Category I or Class 1E.

The capability to operate an Unit 3 EDG for 7 days during the tank cleaning evolution will be assured by an approved plant procedure that controls the following:

- A minimum fuel supply of 3880 gallons from the Unit 3 day and skid tank. This provides 17 hours of operation.
- The extra fuel supply of 8600 gallons in the Unit 4 EDG tanks which will be transferred by using one of the installed Unit 4 transfer pumps. This provides an additional 38 hours of operation.
- Three temporary tanks containing a minimum fuel supply of 38,000 gallons. This fuel supply will provide continued operation for 7 days.

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 change will not involve addition or modification of equipment for Unit 3 EDG fuel storage and transfer. The temporary fuel supply system provides a reliable means of performing the required fuel delivery support function for the Unit 3 EDGs. 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.