

50-250/251



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

August 21, 1998

Mr. Thomas Plunkett
President - Nuclear Division
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: PROPOSED EMERGENCY ACTION LEVEL CHANGE TO TABLE 3-1 OF THE EMERGENCY CLASSIFICATION TABLE IN THE TURKEY POINT PLANT EMERGENCY PLAN (TAC NOS. MA2157 AND MA2158)

Dear Mr. Plunkett:

By letter dated March 31, 1998, Florida Power and Light Company (FPL or the licensee) informed the U.S. Nuclear Regulatory Commission (NRC) of a proposed change to an Emergency Action Level (EAL) for Turkey Point involving the declaration of an Unusual Event for a Reactor Coolant System Leak (RCS). This change has not been implemented pending NRC approval. However, the proposed change has been reviewed by the State and local governments, and the Turkey Point safety committee.

The EAL scheme in the Turkey Point Plant Emergency Plan is based upon the methods described in NUREG-0654. Turkey Point has not adopted the Nuclear Energy Institute (NEI), formerly the NUMARC/NESP-007, alternative methodology for developing EALs required in Section IV.B of Appendix E. Nevertheless, FPL proposes to adopt NEI language for this particular EAL for Turkey Point. FPL proposes to change the specific thresholds to match NEI's thresholds for this particular EAL.

Regulatory Guide (RG) 1.101, Rev. 3, "Methodology for Development of Emergency Action Levels," which endorsed NUMARC/NESP-007, indicated that licensees may not use portions of both methodologies. However, NRC modified this position in 1995. (EPPOS No. 1, "Emergency Preparedness Position on Acceptable Deviations from Appendix 1 of NUREG-0654 based upon the staff's regulatory analysis of NUMARC/NESP-007, "Methodology for Development of Emergency Action Levels.") Under the revised guidance, it was recognized that licensees using NUREG-0654 can benefit from the NEI guidance by enhancing or clarifying some of the site specific EALs.

In the specific EAL proposed for Turkey Point, FPL proposes to remove the reference to the Technical Specifications and remove the threshold of an unidentified RCS leakage of greater than 1 gallon per minute (gpm). The 10 gpm leakage limit would remain as the threshold to declare a Notification of Unusual Event. As a justification, FPL cites the NEI technical bases that indicates that 10 gpm is readily observable in the Control Room; FPL indicated that the lower 1 gpm leak rate can only be determined by a mass balance analysis which is only performed once a day. In addition, FPL states that the 10 gpm threshold is low enough to provide early indication of an emergency situation. NUMARC/NESP-007 values are 10 gpm for unidentified leaks and 25 gpm for identified leaks. FPL proposed threshold leakage rate of 10 gpm is within the limits specified in NUMARC/NESP-007 that the NRC has endorsed in RG 1.101, Rev.3. Therefore, the proposed change is acceptable.

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This completes our action regarding the above TACs. If you have any questions regarding this matter, please contact me at (301) 415-1496.

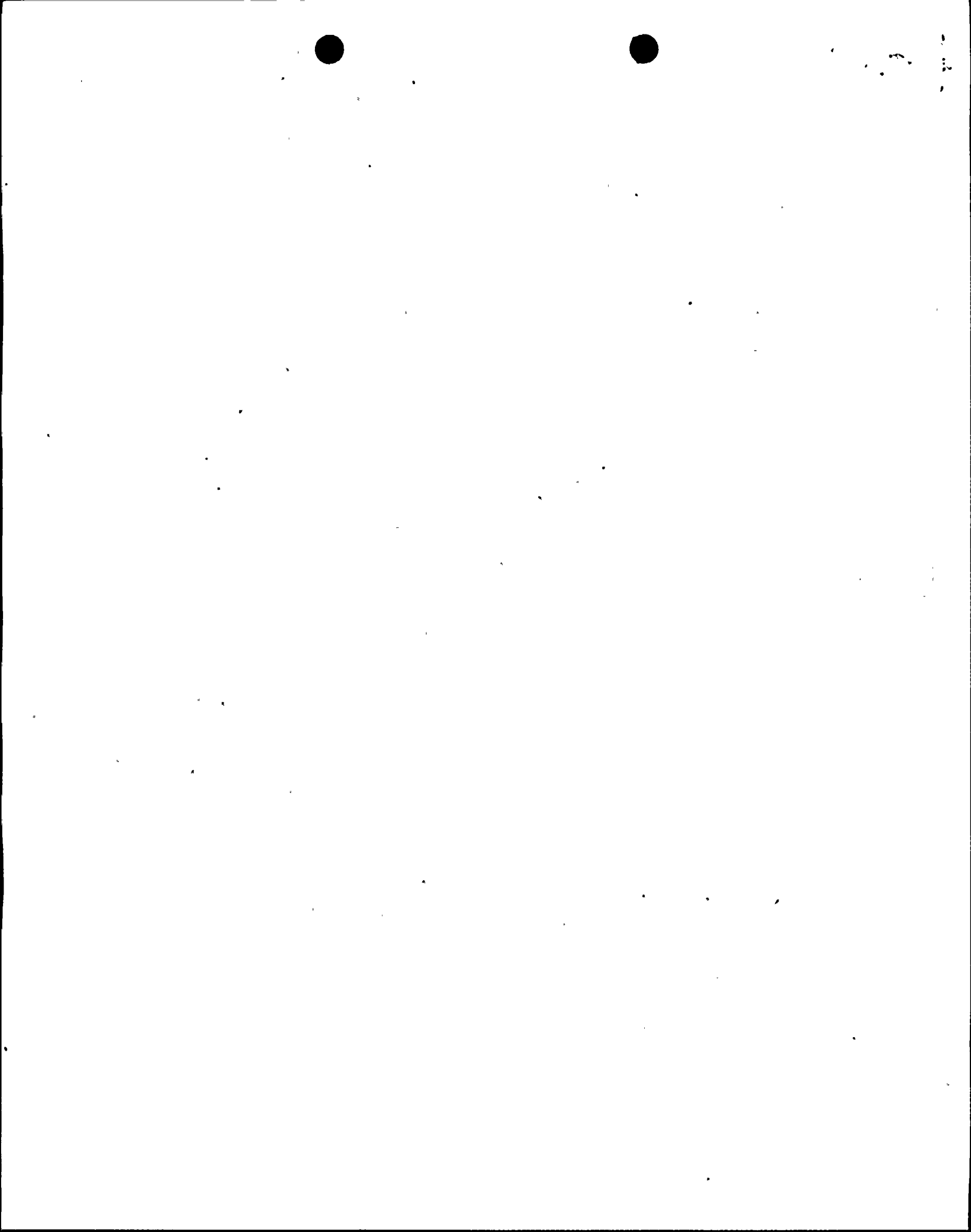
Sincerely,

Kahtan N. Jabbour

Kahtan N. Jabbour, Senior Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

cc: See next page



August 21, 1998

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Sincerely,

Original signed by:

Kahtan N. Jabbour, Senior Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

cc: See next page

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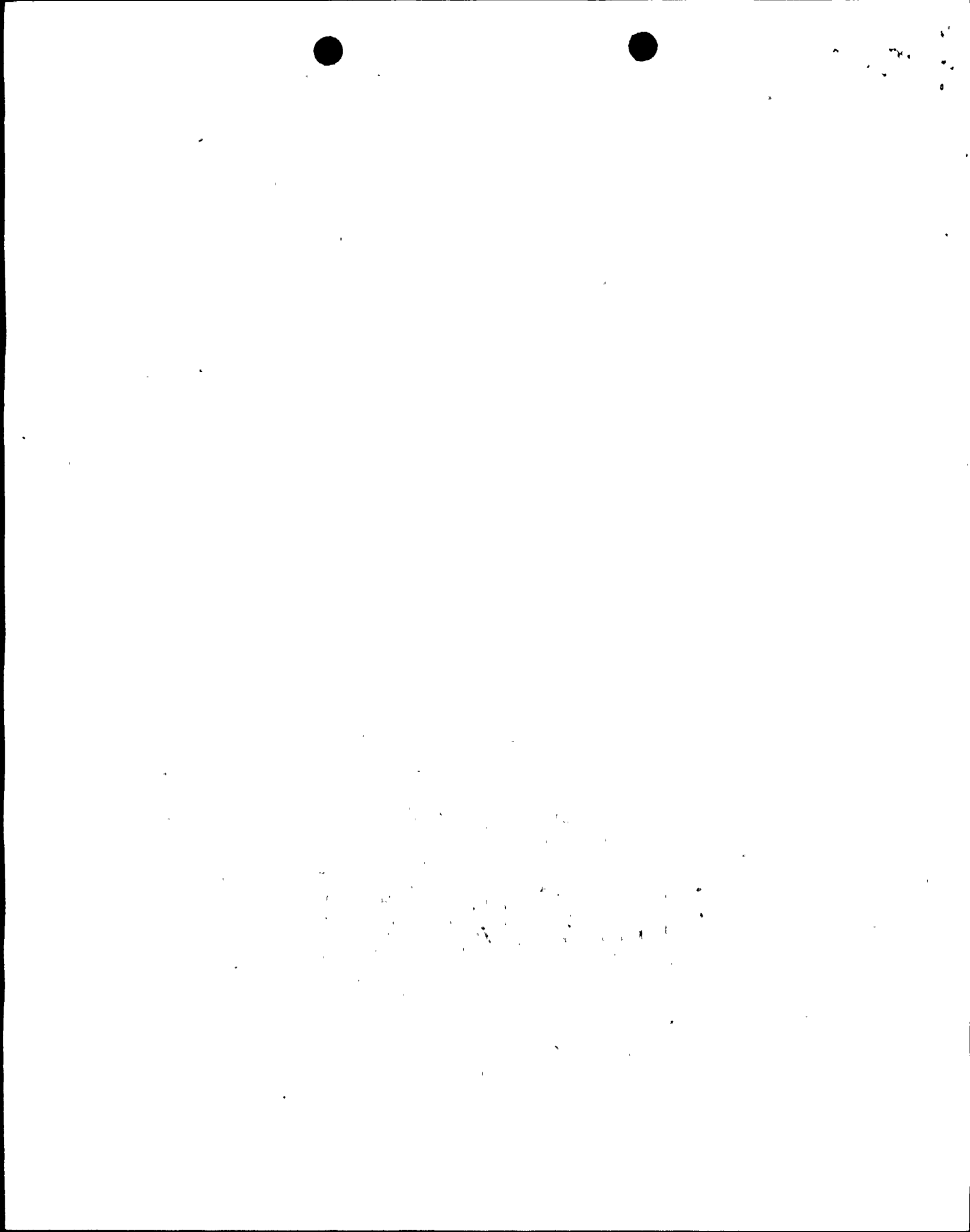
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DATE	08/18/98		08/11/98		08/19/98		08/ /98		08/ /98

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