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

April 6, 2018

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
Florida Power & Light Company
Mail Stop: EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 – CORRECTION TO SAFETY EVALUATION FOR AMENDMENT NOS. 278 AND 273 REGARDING THE TECHNICAL SPECIFICATION REQUIREMENTS PERTAINING TO MODE CHANGE LIMITATIONS (CAC NOS. MF9903 AND MF9904; EPID L-2017-LLA-0254)

Dear Mr. Nazar:

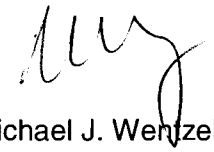
On February 20, 2018, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 278 and 273 to Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Generating Unit Nos. 3 and 4, respectively. The amendments revised the Technical Specification (TS) requirements for mode change limitations in TS 3.0.4 and 4.0.4 based on Technical Specifications Tasks Force, TSTF-359, Revision 9, "Increase Flexibility in Mode Restraints." Following receipt of the amendments, staff from Florida Power & Light Company (the licensee) informed the NRC staff of an error in Section 3.1.1, "Temporary Risk Increases," of the NRC's safety evaluation that was enclosed with the amendments. In order to correctly reflect the licensee's proposed changes, the NRC staff has revised the safety evaluation by replacing the word "prohibit" with the word "allow" in the last sentence of the first paragraph of page 11 of the safety evaluation, which stated:

> The NRC staff agrees with the modification of LCO 3.0.4.b to prohibit transition to MODE 1 in accordance with LCO 3.0.4.b, with a single AFW [auxiliary feedwater] pump or steam supply flow path inoperable.

The licensee informed the NRC staff by e-mail that note being evaluated would allow for a MODE change when a single pump or steam supply flow path is inoperable and note will prohibit a transition to MODE 1 with less than two independent AFW trains operable. The staff reviewed the licensee's feedback and determined that the above statement in the safety evaluation for Amendment Nos. 278 and 273 was in error and should be revised. A copy of page 11 of the safety evaluation for Amendment Nos. 278 and 273 is enclosed. The change is indicated by a bar in the margin. The NRC staff determined that the correction to the original safety evaluation does not change the staff's previous conclusion in its no significant hazards

consideration as published in the *Federal Register* on September 12, 2017 (82 FR 42850) and regarding the acceptability of the changes approved in Amendment Nos. 278 and 273.

Sincerely,



Michael J. Wentzel, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

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AFW trains is appropriate while entry into Mode 1 with two operable trains provides sufficient AFW capability to mitigate a loss of feedwater during startup activities in Mode 1. LCO 3.0.4.b continues to require a risk assessment addressing inoperable systems and components. The NRC staff agrees with the modification of LCO 3.0.4.b to allow transition to MODE 1 in accordance with LCO 3.0.4.b, with a single AFW pump or steam supply flow path inoperable.

Limited Time in TS Required Actions

Any temporary risk increase will be limited by, among other factors, duration constraints imposed by the TS completion times of the inoperable systems. For the systems and components that are not higher risk, any temporary risk increase associated with the proposed allowance will be smaller than what is considered acceptable when the same systems and components are inoperable at power. This is due to the fact that completion times associated with the majority of TS systems and components were developed for power operation and pose a smaller plant risk for action statement entries initiated or occurring at lower modes of operation as compared to power operation.

The LCO 3.0.4.b allowance will be used only when the licensee determines that there is a high likelihood that the LCO will be satisfied following the mode change. This will minimize the likelihood of additional temporary risk increases associated with the need to exit a mode due to failure to restore the unavailable equipment within the completion time. In most cases, licensees will enter into a higher mode with the intent to move up to Mode 1 (power operation). As discussed in Section 3.2, the revised reactor oversight process monitors unplanned power changes as a performance indicator. The reactor oversight process, thus, discourages licensees from entering a mode or other specified condition in the applicability of an LCO, and moving up in power, when there is a likelihood that the mode would have to be subsequently exited due to failure to restore the unavailable equipment within the completion time. Another disincentive for licensees to enter a higher mode when an LCO is not met is related to reporting requirements. It clearly states in 10 CFR 50.72 and 50.73 that a report is required when a nuclear plant shutdown or mode change is required by TS. The NRC's oversight program will provide the framework for inspectors and other staff to follow the history at a specific plant of entering higher modes while an LCO is not met, and use such information in assessing the licensee's actions and performance.

3.1.2 Cumulative Risk Increases

The cumulative risk impact of the change to allow the plant to enter a higher mode of operation with one or more safety-related components unavailable (as proposed here), is measured by the average yearly risk increase associated with the change. In general, this cumulative risk increase is assessed in terms of both CDF and LERF (i.e., ΔCDF and ΔLERF, respectively). The increase in CDF due to the proposed change is expressed by the following equation, which integrates the risk impact from all expected specified conditions (i.e., all expected plant conditions caused by mode changes with various TS systems and components unavailable).

$$\Delta CDF = \Sigma(\Delta CDF_i) = \Sigma\ ICCDP_i\ f_i \qquad (2)$$

Where

ΔCDF_i = the CDF increase due to specified condition i

$ICCDP_i$ = the ICCDP associated with specified condition i

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