NRC FORM 195 (2-76)

U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER 50-250/251

FILE NUMBER

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

TO:	FROM:	DATE OF DOCUMENT
Mr. Victor Stello	Florida Power & Light Company Miami, Florida Robert E. Uhrig	7/27/77
		DATE RECEIVED 8/1/77

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DESCRIPTION

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ACKNOWLEDGED

PLANT NAME: Turkey Point Units 3 & 4

RJL 8/2/77 (2-P)

ENCLOSURE

License No. DPR-31 & 41 Appl for Amend: tech specs proposed change concerning exemption from requirements with respect to the method for leak testing personnel and emergency airlocks after each opening... notorized 7/29/77.....

(2-P)

FOR ACTION/INFORMATION

SAFETY	ENVIRONMENTAL
ASSIGNED AD:	ASSIGNED AD: V. MOORE (LTR)
☑ BRANCH CHIEF: (7) LEAR	BRANCH CHIEF:
PROJECT MANAGER:	PROJECT MANAGER:
LICENSING ASSISTANT:	LICENSING ASSISTANT:
	B. HARLESS

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CASE	SIHWELL	OPERATING REACTORS	BALLARD
BOYD	PAWLICKI	STELLO	YOUNGBLOOD
		☑ EISENHUT	
PROJECT MANAGEMENT	REACTOR SAFETY	☑ SHAO	~~SITE TECH.~~
SKOVHOLT	ROSS	☑ BAER	
P. COLLINS	NOVAK	☑ BUTLER	GAMMILL (2)
HOUSTON	ROSZTOCZY	☑ GRIMES	
MELTZ	CHECK	☑ M. FAIRTILE	SITE ANALYSIS
HELTEMES			VOLLMER
SK	AT&I		BUNCH
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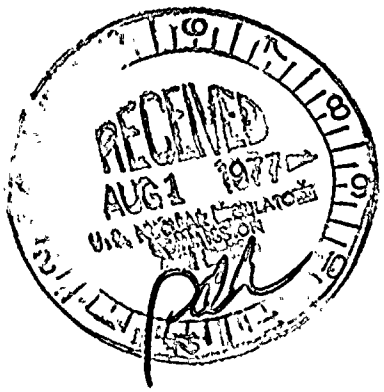
Appl B

P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

July 27, 1977
L-77-239



Director of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington DC 20555

Dear Mr. Stello:

Regulatory File Cy

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Proposed Amendment to Facility
Operating Licenses DPR-31 and DPR-41

Our letter of May 2, 1977, (L-77-134) requested that Appendix A of Operating Licenses DPR-31 and DPR-41 be amended. This letter supersedes our previous request.

On February 28, 1977, we received a letter from Mr. George Lear of your staff asking that we revise our request of September 12, 1975, (L-75-437) for exemption from certain requirements of Appendix J to 10 CFR 50. Specifically, we are requesting, pursuant to 10 CFR 50.12, exemption from the requirements of Section III. B with respect to the method for leak testing personnel and emergency airlocks after each opening. Section III. B requires that such tests be performed by local pneumatic pressurization at a pressure not less than the postulated peak accident pressure (P_a) inside containment. However, for reasons described in our September 12, 1975, letter, we plan to use a vacuum test device to leak test the airlock door seals after each opening in lieu of a positive pressure test of the entire airlock.

This exemption request has been reviewed by the Turkey Point Plant Nuclear Safety Committee (PNSC) and the Florida Power & Light Company Nuclear Review Board (CNRB) with the following conclusions:

1) The request for exemption, as stated above, is necessary.

2) The request appears to conform with guideline 3 in Enclosure 2 to Mr. Lear's letter.

3) We intend to comply with the requirements of Appendix J regarding the frequency of airlock testing.

   A Type B test of the entire airlock will be performed at least every 6 months and a vacuum test of the door seals will be performed after each opening.

4) One objective of airlock leak testing, as stated in Enclosure 2 to Mr. Lear's letter, is that the "after each opening" test will provide a means of assuring that the door seals have not been damaged or seated improperly during airlock use. The vacuum test will facilitate our accomplishment of this objective.

5) The vacuum test is an industry approved alternative to a pressure test.

6) Performance of a door seal vacuum test will not adversely affect the health and safety or the common defense and security of the public.

As a result of this exemption request, we propose to modify our Technical Specifications on airlock leak testing. The present proposal supplements our previous proposal of September 20, 1974. In accordance with 10 CFR 50.30, three (3) originals and forty (40) copies of our request to amend Appendix A of Operating Licenses DPR-31 and DPR-41 are attached. The proposed changes are described below and shown on the accompanying Technical Specification page bearing the date of this letter in the lower right hand corner.

Page 4.4-2

Specification 4.4.2.2 is revised to conform with our plans for leak testing airlocks.

The PNSC and CNRB have also reviewed the proposed Technical Specification amendment and have concluded that it does not involve a significant hazards consideration and should not require prenoticing.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU:NR:tm
Attachment

cc: Norman C. Moseley, Region II
Robert Lowenstein, Esquire

4.4.2 LOCAL PENETRATION TESTS

Test Procedure and Frequency

Local leak detection tests of the following components shall be performed at a pressure not less than 50 psig using pressure decay, soap bubble, halogen detection or equivalent methods at the frequency listed, unless otherwise noted:

1. Containment purge valves (pressure applied in connecting duct) - each refueling.

2. Personnel and Emergency Airlocks

   a. *Within 3 days of every first of a series of openings when containment integrity is required, verify that door seals have not been damaged or seated improperly by vacuum testing the volume between the door seals in accordance with approved plant procedures.

   b. At least once per 6 months, conduct an overall airlock leakage test to verify that the overall airlock leakage rate is within its limit.

3. Equipment access opening (pressure applied between gaskets) - annually and after use.

4. Fuel transfer tube flange (pressure applied between gaskets) - each refueling.

5. Electrical penetrations (pressure applied to canister) - each refueling

Acceptance Criteria

Repairs and tests shall be made whenever the sum of the local leak rate tests, including the isolation valves discussed in 4.4.4, exceeds sixty percent of the total containment allowable leak rate.

4.4.3 REPORT OF TEST RESULTS

Each integrated leak rate test will be the subject of a summary technical report, including

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*Exemption to Appendix "J" of 10 CFR 50.
In accordance with NRC Staff position.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this said 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.

Robert E. Uhrig

Robert E. Uhrig

Subscribed and sworn to before me this

29 day of July, 19 77

Theresa M Miranda

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

NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION EXPIRES MAY 5, 1981
BONDED THRU MAYNARD BONDING AGENCY

My commission expires: _____