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, Fla. Robert E. Uhrig	6/9/77
		DATE RECEIVED 6/15/77

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DESCRIPTION

ACKNOWLEDGED

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PLANT NAME: Turkey Point Units 3 & 4

RJL 6/17/77

ENCLOSURE

Amdt. to OL/change to Appendix A tech specs...notorized 6/10/77...concerns the air filtration systems....

40 cy

(10-P)

40 encl.

FOR ACTION/INFORMATION

SAFETY		ENVIRONMENTAL	
ASSIGNED AD:		ASSIGNED AD:	V. MOORE (LTR)
☒ BRANCH CHIEF: (5)	LEAR	BRANCH CHIEF:	
☒ PROJECT MANAGER:	ELLIOTT	PROJECT MANAGER:	
☒ LICENSING ASSESTANT:	PARRISH	LICENSING ASSISTANT:	
			B. HARLESS

INTERNAL DISTRIBUTION

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☒ OELD		LAINAS	CRUTCHFIELD
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☒ HANAUER	KNIGHT	F. ROSA	ENVIRO TECH.
MIPC	BOSNAK		ERNST
CASE	SIHWELL	OPERATING REACTORS	BALLARD
BOYD	PAWLICKI	☒ STELLO	YOUNGBLOOD
		☒ EISENHUT	
PROJECT MANAGEMENT	REACTOR SAFETY	☒ SHAO	
SKOVHOLT	ROSS	☒ BAER	SITE TECH.
P. COLLINS	NOVAK	☒ BUTLER	GAMMILL (2)
HOUSTON	ROSZTOCZY	☒ GRIMES	
MELTZ	☒ CHECK		SITE ANALYSIS
HELTEMES			VOLLMER
SK	AT&I		BUNCH
	SALTZMAN		☒ J. COLLINS
	RUTBERG		KREGER

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NAT LAB		
REG IV (J. HANCHETT)		
☒ 16 CYS ACRS SENT CATEGORY B		

Rapp 2

NRC FORM 195 (2-76)

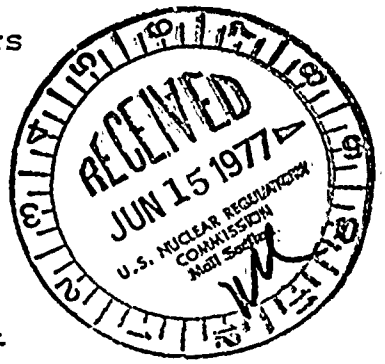
O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

June 9, 1977
L-77-174

Regulatory Docket File

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



Dear Mr. Stello:

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

In accordance with 10 CFR 50.30, Florida Power & Light Company submits herewith three (3) signed originals and forty (40) copies of a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41.

In response to telephone requests from members of your staff, we have revised our proposal of May 3, 1976 on the subject of air filtration systems. The present proposal conforms as near as possible to the Standard Technical Specifications without our having to make hardware modifications. The proposed changes are described below and shown on the accompanying Technical Specification pages bearing the date of this letter in the lower right hand corner.

Pages ii and iii

Revised Table of Contents.

Page 3.4-4

Specification 3.4.3.b is revised. This specification concerns the limiting conditions for operation applicable to the Emergency Containment Filtering System during power operation.

Page 3.13-1

New specification 3.13 is added. This specification concerns the limiting conditions for operation applicable to the Control Room Ventilation System and the Post Accident Containment Vent System.

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Pages 4.7-1 through 4.7-3

The surveillance requirements of specifications 4.7.1 (Emergency Containment Filtering System) and 4.7.2 (Post Accident Containment Vent System) are revised. A new specification 4.7.3 (Control Room Ventilation System) is added.

Page B3.13-1

A new section B3.13-1 is added to provide bases for new specification 3.13.

Page B4.7-1

The bases for specification 4.7 are revised to include the Control Room Ventilation System.

The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power & Light Company Nuclear Review Board and the conclusion reached that it does not involve an unreviewed safety question.

Very truly yours,

Robert E. Uhrig
Vice President

REU/MAS/cpc

Attachment

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

TABLE OF CONTENTS (continued)

TABLE OF CONTENTS (continued)

1. ONE emergency containment cooling unit may be out of service for a period of 24 hours. Prior to initiating maintenance, the other TWO units shall be tested to demonstrate operability.

2. ONE containment spray pump may be out of service provided it is restored to operable status within 24 hours. The remaining containment spray pump shall be tested to demonstrate operability before initiating maintenance on the inoperable pump.

3. Any valve in the system may be inoperable provided repairs are completed within 24 hours. Prior to initiating repairs, all valves that provide the duplicate function shall be tested to demonstrate operability.

3. EMERGENCY CONTAINMENT FILTERING SYSTEM

During times when containment integrity is required:

a. The three Emergency Containment Filtering Units shall be operable at all times or the reactor shall be placed in hot shutdown within 12 hours and in cold shutdown within the following 30 hours, with the following exception:

   1) If one of the three emergency containment filtering trains is made or found to be inoperable for any reason, reactor operation is permissable only during the succeeding seven (7) days provided that all active components of the other two trains shall be demonstrated to be operable within two hours and daily thereafter.

b. Any valve in the system may be inoperable provided repairs are completed within 24 hours except as stated in 3.a.1 above. Prior to initiating maintenance, all valves that provide the duplicate function shall be tested to demonstrate operability.

4. COMPONENT COOLING SYSTEM

a. The reactor shall not be made critical, except for low power physics tests, unless the following conditions are met.

3.13 AIR TREATMENT SYSTEMS

Applicability: Applies to the operating status of the Control Room Ventilation System and the Post Accident Containment Vent System.

Objectives: To define those limiting conditions for operation that are necessary:

1. To remove airborne activity from the control room if detected.
2. To reduce containment hydrogen concentration and to reduce containment pressure during post-accident conditions.

Specification:

1. CONTROL ROOM VENTILATION SYSTEM

   a. The Control Room Ventilation (Emergency Internal Cleanup) System may be inoperable for a period of up to seven days. If the system cannot be made operable within seven days, both reactors shall be shut down.

2. POST ACCIDENT CONTAINMENT VENT SYSTEM

   a. The Post Accident Containment Vent System may be inoperable for a period up to thirty days. If the system cannot be made operable within 30 days, both reactors shall be shutdown.

4.7 EMERGENCY CONTAINMENT FILTER SYSTEM, POST ACCIDENT CONTAINMENT VENT SYSTEM AND CONTROL ROOM VENTILATION SYSTEM.

Applicability: Applies to the Emergency Containment Filter System, the Post Accident Containment Vent System, the Control Room Ventilation System.

Objectives: To verify that these systems and their components will be able to perform their design functions.

In the event that painting, fire, or chemical release occurs such that the filters are exposed to the effluents of these events, the system will be tested to verify its performance of design features.

Specification: 4.7.1 EMERGENCY CONTAINMENT FILTERING SYSTEM

1. Operating Tests

System tests shall be performed once per operating cycle or once per 18 months, whichever comes first.

The tests shall consist of pressure drop and flow measurements across all filters in the plenum. Less than 6" of water pressure drop at design flow (± 10%) across the combined HEPA filters and charcoal adsorbers shall constitute acceptable performance.

Once per operating cycle, the Emergency Containment Filtering System shall be tested to demonstrate automatic initiation upon receipt of a safety injection signal.

The Emergency Containment Filtering System shall be operated monthly for at least 15 minutes to demonstrate operability.

2. Performance Tests

a. At least once per 18 months or after every 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests on each Emergency Containment Filter plenum shall be performed. In addition, in-place DOP and halogenated hydrocarbon tests shall be performed after (1) any structural maintenance on system housings, (2) after any testing which might have affected filter bank efficiency, (3) after complete or partial replacement of a filter bank, or (4) after exposure of the filters to effluents from painting, fire, or chemical release. Removal of $\geq$99% DOP and $\geq$99% halogenated hydrocarbon shall constitute acceptable performance. Once per operating cycle, a charcoal surveillance specimen from one of the emergency containment filters shall be analyzed for elemental iodine removal capability. The results of the laboratory carbon sample analysis shall show >99.9% removal efficiency. Failing this, the charcoal shall be replaced with charcoal which meets or exceeds original specifications.

b. An air distribution test shall be performed at least once, and thereafter only if there is indication that the air distribution has changed.

4.7.2 POST ACCIDENT CONTAINMENT VENT SYSTEM

1. Operating Tests

Operating tests shall be performed annually. The tests shall consist of visual inspection of the system, operation of all valves, and pressure drop and air flow measurements. Visual inspection shall include search for any foreign materials and gasket deterioration in the HEPA filters and charcoal adsorbers. Less than 6" of water pressure drop at 55 cfm flow shall constitute acceptable performance.

2. Performance Tests

At least once per 18 months or after 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests on the Post Accident Containment Vent filters shall be performed. In addition, in-place DOP and halogenated hydrocarbon tests shall be performed after (1) any structural maintenance on system housings, (2) after any testing which might have affected filter bank efficiency, (3) after complete or partial replacement of a filter bank, or (4) after exposure of the filters to effluents from painting, fire or chemical release. Removal of $\geq$99% DOP and $\geq$99% halogenated hydrocarbon shall constitute acceptable performance.

The hydrogen concentration measurement instrument shall be calibrated with proper consideration for humidity.

4.7.3 CONTROL ROOM VENTILATION (EMERGENCY INTERNAL CLEARNUP) SYSTEM

1. Operating Tests

The Control Room Ventilation System shall be operated monthly for at least 15 minutes to demonstrate operability. Auto initiation of the systems operations shall be checked annually. Pressure drop measurements across the filter bank shall be made annually. Less than 6" of water pressure drop at designed flow (±10%) across the combined HEPA filter and charcoal adsorbers shall constitute acceptable performance.

2. Performance Tests

At least once per 18 months or after 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests on the filters shall be performed. In addition, in-place DOP and halogenated hydrocarbon tests shall be performed after (1) any structural maintenance on system housings, (2) after any testing which might have affected filter bank efficiency, (3) after complete or partial replacement of a filter bank, or (4) after exposure of the filters to effluents from painting, fire, or chemical release. Removal of ≥99% DOP and ≥99% halogenated hydrocarbon shall constitute acceptable performance.

A charcoal surveillance specimen from one of the charcoal adsorbers shall be removed and analyzed annually for methyl iodide removal capability. The results of the laboratory carbon sample analysis shall show ≥85% removal efficiency with ≥95% relative humidity and ≥130°C. Failing this, the charcoal shall be replaced with charcoal which meets or exceeds original specifications.

B3.13 BASES FOR LIMITING CONDITIONS FOR OPERATION, AIR TREATMENT SYSTEMS

The Control Room Ventilation (Emergency Internal Cleanup) System is designed to partially filter the Control Room atmosphere for recirculation during Control Room isolation conditions. If the system is inoperable, there is no immediate threat to the Control Room and reactor operation may continue for a limited time while repairs are being made. If the system cannot be repaired within seven days, both reactors are shutdown in accordance with 10 CFR 50.36(c).

The Post Accident Containment Vent System is designed to facilitate controlled venting of either containment through HEPA and charcoal filters to reduce combustible gas concentration following a loss of coolant accident. If the system is inoperable, there is no significant threat caused by continued reactor operation because the system would only be used seven to ten days after an accident. Reactor operation may, therefore, continue for up to thirty days while repairs are being made. If the system cannot be repaired in that time, both reactors are shutdown in accordance with 10 CFR 50.36(c).

B 4.7 BASES FOR EMERGENCY CONTAINMENT FILTERING SYSTEM, POST ACCIDENT CONTAINMENT VENT SYSTEM, CONTROL ROOM VENTILATION SYSTEM.

System components are not subject to rapid deterioration, having lifetimes of many years, even under continuous flow conditions. Visual inspection and operating tests provide assurance of system reliability and will insure early detection of conditions which could cause the system to fail or operate improperly. The performance tests prove conclusively that filters have been properly installed, that no deterioration or damage has occurred, and that all components and subsystems operate properly. The tests are performed in accordance with the methodology and intent of ANSI 410, 1975, and provide assurance that filter performance has not deteriorated below original specification values due to aging, contamination, or other effects.

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

10th day of June, 1977

Rebecca H Rowell

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

My commission expires: NOTARY PUBLIC STATE OF FLORIDA at LARGE MY COMMISSION EXPIRES APRIL 2, 1980 BONDED THRU MAYNARD BONDING AGENCY

P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

June 9, 1977
L-77-174

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

Dear Mr. Stello:

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

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Robert E. Uhrig
Vice President

REU/MAS/cpc

Attachment

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

NRC FORM 195 (2-70) 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, Fla. Mr. Robert E. Uhrig	6/8/77
		DATE RECEIVED 6/13/77

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DESCRIPTION:

(1-P)

PLANT NAME:

Turkey Point Units 3 & 4

RJL 6/14/77

ENCLOSURE

Amdt. to OL/change to Appendix A tech specs....summitted as a result of a re-evaluation of ECCS cooling performance.. notorized 6/8/77....

(28-P)

DO NOT REMOVE

ACKNOWLEDGED

SAFETY	FOR ACTION/INFORMATION	ENVIRO
ASSIGNED AD:		ASSIGNED AD:
BRANCH CHIEF:	Lear (5)	BRANCH CHIEF:
PROJECT MANAGER:	Elliott	PROJECT MANAGER:
LIC. ASST.:	Parrish	LIC. ASST.:

INTERNAL DISTRIBUTION

REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
I & E (2)	SCHROEDER	BENAROYA	DENTON & MULLER
ORLD		LAINAS	
GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH
MIPC	MACCARRY	KIRKWOOD	ERNST
CASE	KNIGHT		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	EISENHUT	STEPP
P. COLLINS	NOVAK	SHAO	HULMAN
HOUSTON	ROSZTOCZY	BAER	
PETERSON	CHECK	BUTLER	SITE ANALYSIS
MELTZ		GRIMES	VOLLMER
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	RUTBERG		KREGER

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