

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

TO: Mr. Victor Stello		FROM: Florida Power & Light Company Miami, Florida Robert E. Uhrig		DATE OF DOCUMENT 5/2/77
<input checked="" type="checkbox"/> LETTER <input checked="" type="checkbox"/> ORIGINAL <input type="checkbox"/> COPY		<input checked="" type="checkbox"/> NOTORIZED <input checked="" type="checkbox"/> UNCLASSIFIED		DATE RECEIVED 5/5/77
PROP		INPUT FORM		NUMBER OF COPIES RECEIVED <b>3 SIGNED</b>

DESCRIPTION

Ltr. trans the following:

**DO NOT REMOVE**

(2-P)

PLANT NAME:  
Turkey Points Units 3 & 4

RJL

**ACKNOWLEDGED**

ENCLOSURE

Amdt. to OL/change to Appendix A tech specs...notorized 5/2/77...with proposal to modify tech specs on airlock leak testing....

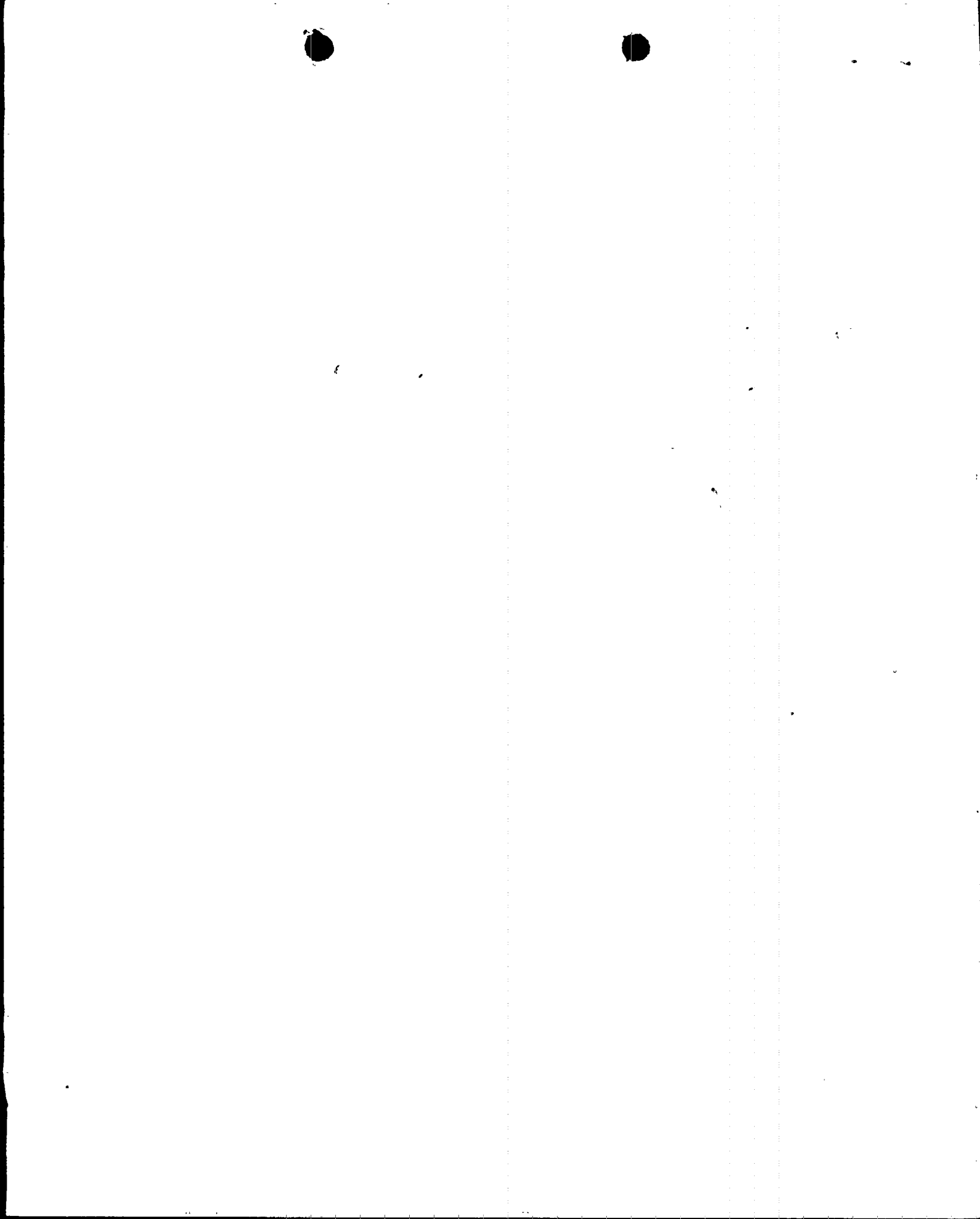
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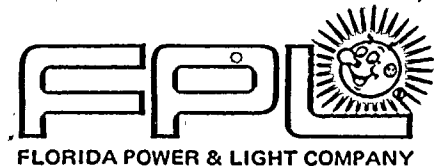
SAFETY		FOR ACTION/INFORMATION		ENVIRO
ASSIGNED AD:				ASSIGNED AD:
BRANCH CHIEF:				BRANCH CHIEF:
PROJECT MANAGER:				PROJECT MANAGER:
LIC. ASST. :				LIC. ASST. :

INTERNAL DISTRIBUTION				
<input checked="" type="checkbox"/> REG. FILE		SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY & SYSTEMS
<input checked="" type="checkbox"/> NRC PDR		HEINEMAN	TEDESCO	ENVIRO ANALYSIS
<input checked="" type="checkbox"/> I & E (2)		SCHROEDER	BENAROYA	DENTON & MULLER
<input checked="" type="checkbox"/> OELD			LAINAS	
<input checked="" type="checkbox"/> GOSSICK & STAFF		ENGINEERING	IPPOLITO	ENVIRO TECH.
<input checked="" type="checkbox"/> MIPC		MACARRY	KIRKWOOD	ERNST
<input checked="" type="checkbox"/> CASE		BOSNAK		BALLARD
<input checked="" type="checkbox"/> HANAUER		SINWEIL	OPERATING REACTORS	SPANGLER
<input checked="" type="checkbox"/> HARLESS		PAWLICKI	STELLO	
				SITE TECH.
<input checked="" type="checkbox"/> PROJECT MANAGEMENT		REACTOR SAFETY	OPERATING TECH.	GAMMILL
<input checked="" type="checkbox"/> BOYD		ROSS	EISENHUT	STEPP
<input checked="" type="checkbox"/> P. COLLINS		NOVAK	SHAO	HULMAN
<input checked="" type="checkbox"/> HOUSTON		ROSZTOCZY	BAER	
<input checked="" type="checkbox"/> PETERSON		CHECK	BUTLER	SITE ANALYSIS
<input checked="" type="checkbox"/> MELTZ			CRIMES	VOLLNER
<input checked="" type="checkbox"/> HELTFEMES		AT & I		BUNCH
<input checked="" type="checkbox"/> SKOVHOLT		SALTZMAN		J. COLLINS
		RUTBERG		KREGER

EXTERNAL DISTRIBUTION			CONTROL NUMBER
<input checked="" type="checkbox"/> LPDR: Miami, Fla		NAT. LAB:	BROOKHAVEN NAT. LAB.
<input checked="" type="checkbox"/> TIC:		REG-V, IE	ULRIKSON (ORNL)
<input checked="" type="checkbox"/> NSIC:		LA PDR	
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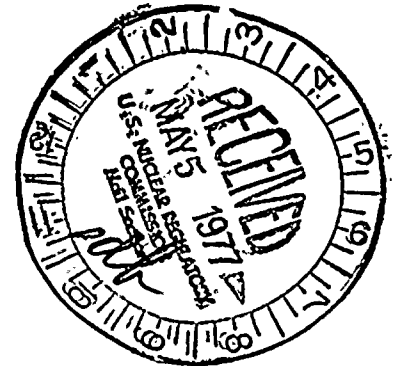




May 2, 1977  
L-77-134

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: **REGULATORY DOCKET FILE COPY**  
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

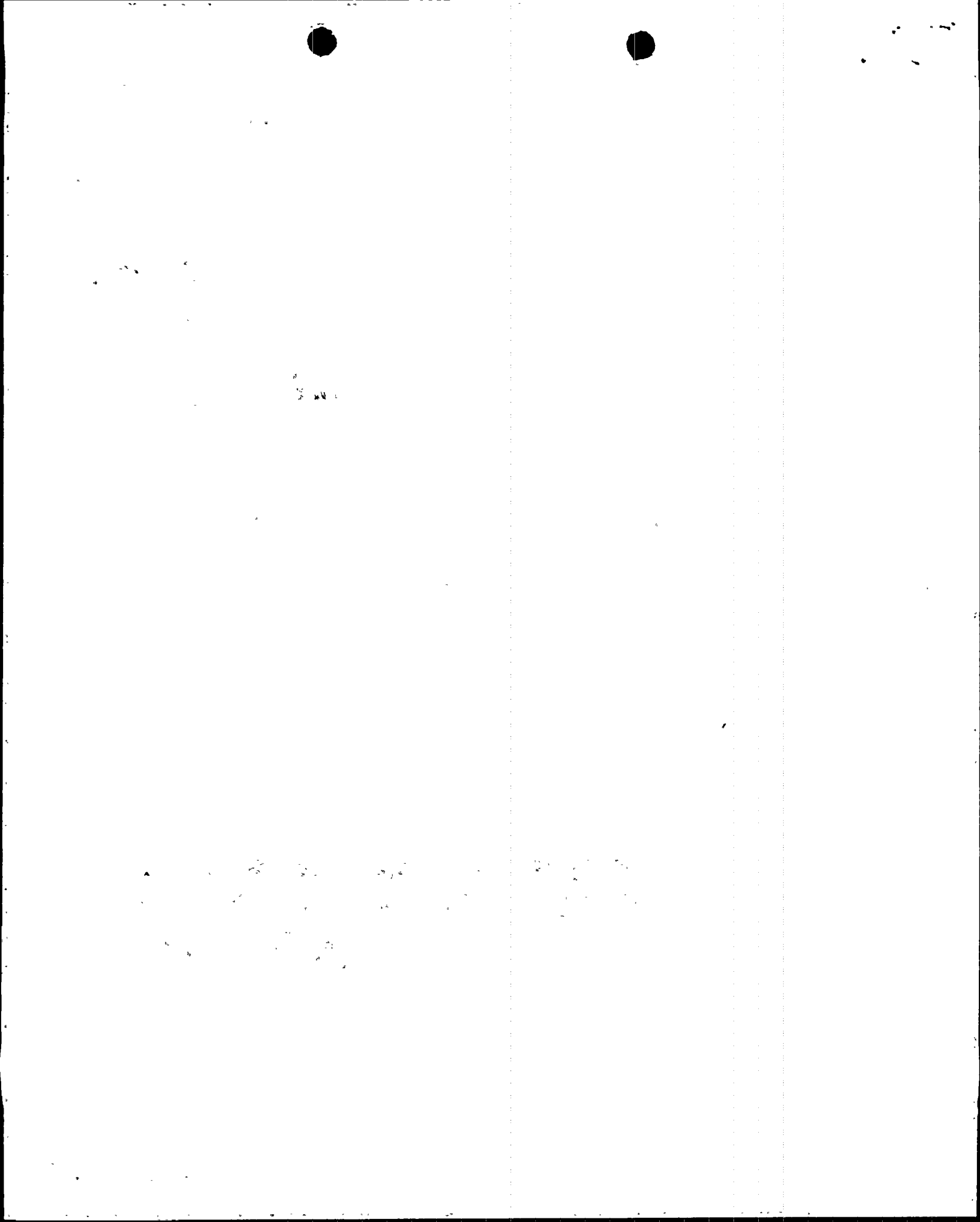


On February 28, 1977, we received a letter from Mr. George Lear of your staff asking that we revise our request of September 12, 1975 (L-75-437) for exemption from certain requirements of Appendix J to 10CFR50. Specifically, we are requesting, pursuant to 10CFR50.12, exemption from the requirements of 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 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.

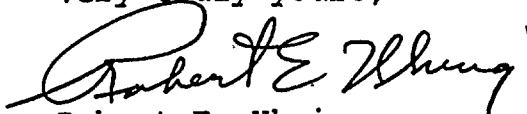
As a result of this exemption request, we propose to modify our Technical Specifications on airlock leak testing. The present proposal supplements our previous proposal of September 20, 1974. In accordance with 10CFR50.30, three (3) originals and forty (40) copies of our request to amend Appendix A of 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,

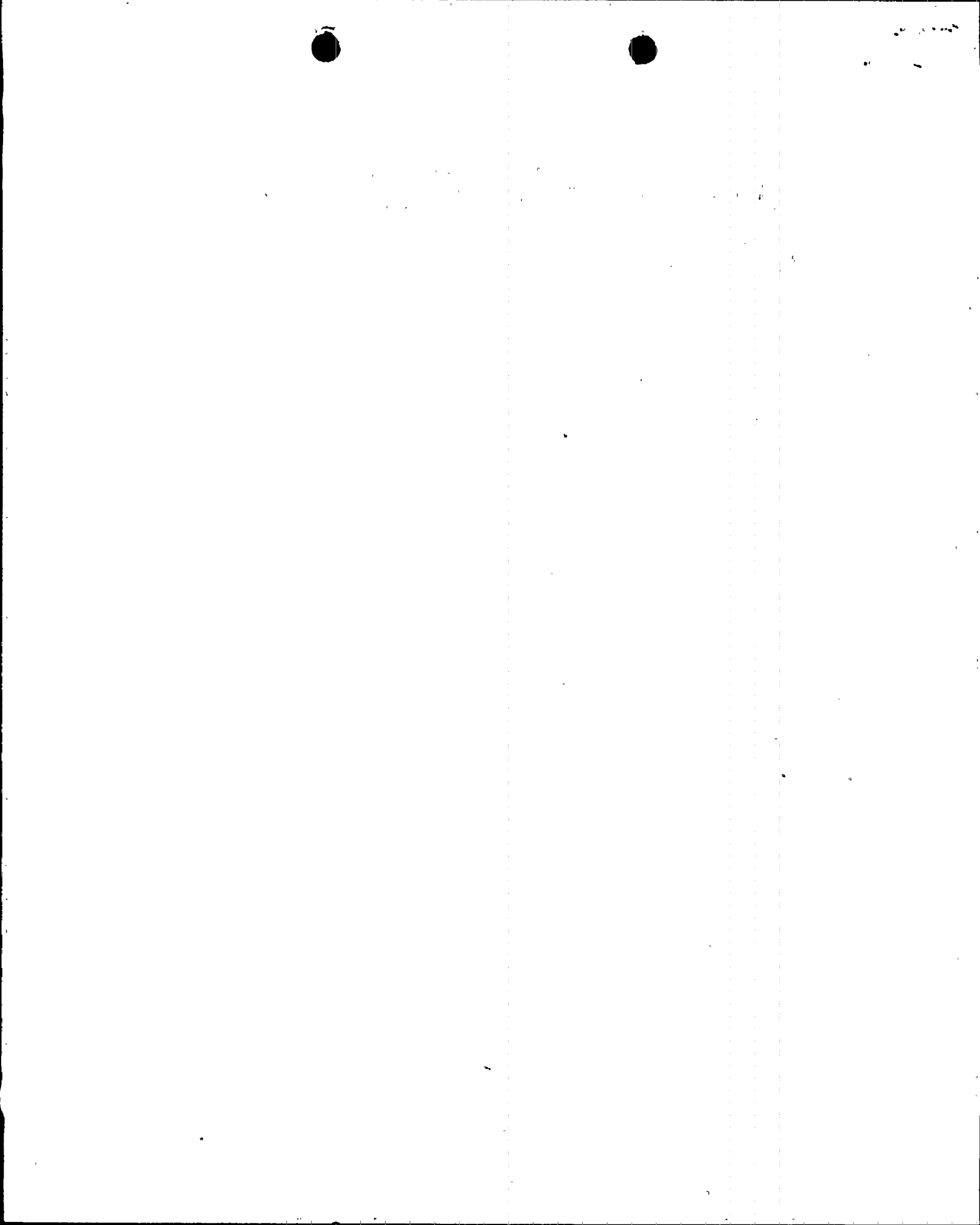


Robert E. Uhrig  
Vice President

REU/MAS/cmp

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) - prior to integrated leak tests.

##### Acceptance Criteria

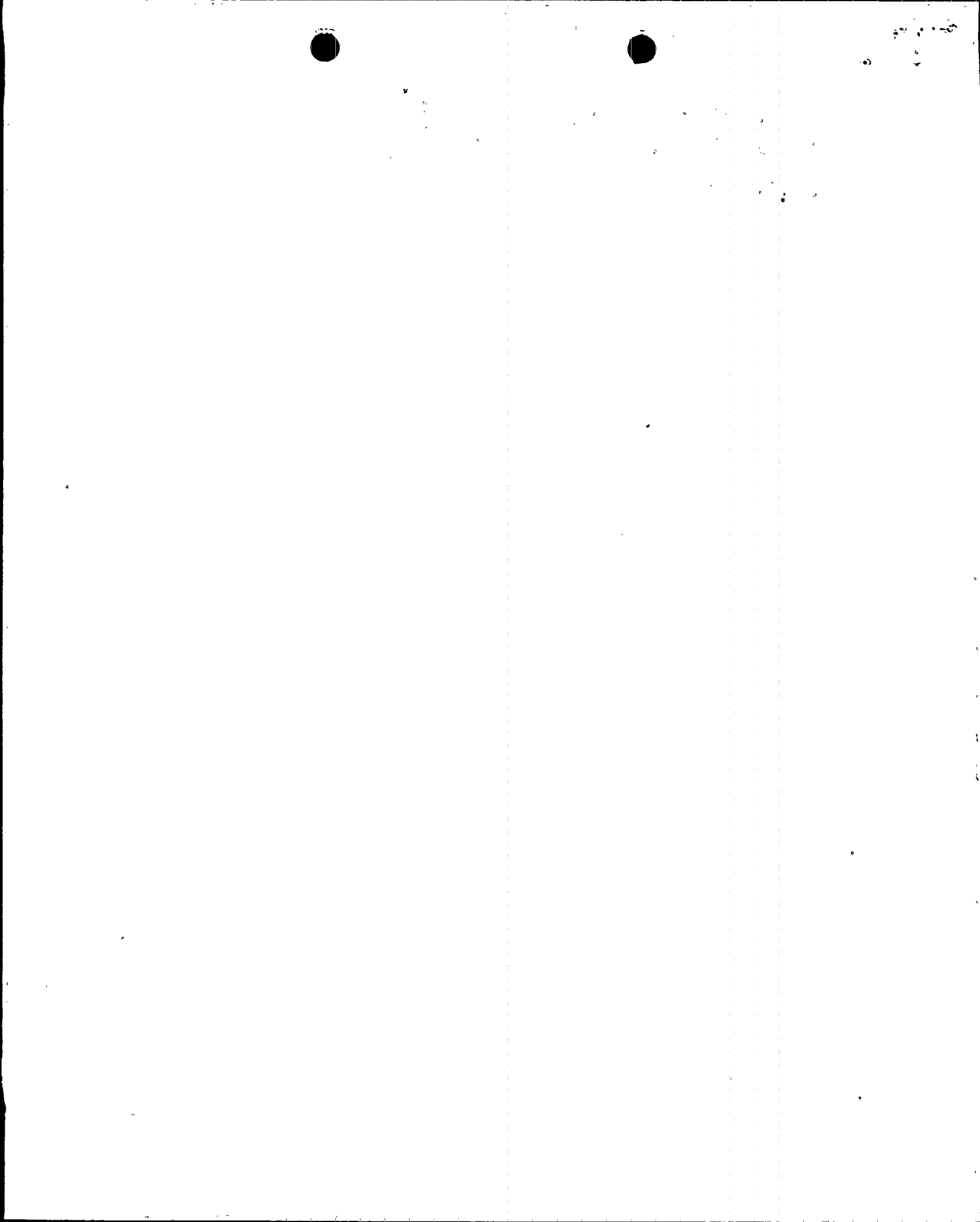
Repairs and tests shall be made whenever the sum of the local leak rate tests, including the isolation valves discussed in 4.4.4, exceeds sixty per cent of the total containment allowable leak rate.

#### 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 10CFR50.  
In accordance with NRC Staff position.



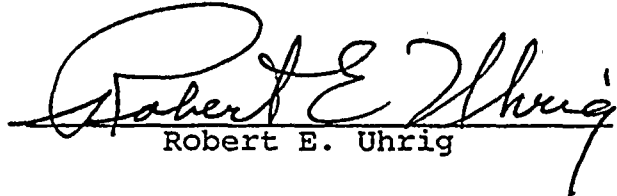


STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )           ss.

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 state-  
ments 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

Subscribed and sworn to before me this

2 day of May, 1977

  
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 JAN. 26, 1979  
BONDED THRU GENERAL INSURANCE UNDERWRITERS



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