NRC FORM 195 (2-76)

U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER: 50-250/251

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TO: Mr. Victor Stello

FROM: Florida Power & Light Company, Miami, Florida, Mr. Robert E. Uhrig

DATE OF DOCUMENT: 10/21/76

DATE RECEIVED: 10/26/76

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PROP

INPUT FORM

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DESCRIPTION

Ltr. w/attached....notorized 10/21/76.... furnishing Amdt. to ol/change to Appendix A tech specs of facility operating licenses DPR-31 and DPR -41.

PLANT NAME: (5-P)

Turkey Point Units 3 & 4

ENCLOSURE

DO NOT REMOVE

ACKNOWLEDGED

FOR ACTION/INFORMATION — ENVIRO 10/27/76 RJL

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NRC FORM 195 (2-76)

P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

October 21, 1976
L-76-367

Office 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.

The proposed amendment is described below and shown on the accompanying Technical Specification page bearing the date of this letter in the lower right hand corner.

Page 6-15

The Specification 6.8.3.c time limit for Plant Nuclear Safety Committee (PNSC) review and Plant Superintendent-Nuclear approval of temporary changes to procedures is extended from 7 days to 14 days.

The proposed amendment is based on the Standard Technical Specifications for Westinghouse Pressurized Water Reactors. It has been reviewed and the conclusion reached that it does not involve a significant hazards consideration, therefore, pre-noticing pursuant to 10 CFR 2.105 should not be required. A safety evaluation is attached.

Very truly yours,

E. A. Adomat
for Robert E. Uhrig
Vice President

10777

REU/MAS/cpc
Attachments
cc: Mr. Norman C. Moseley
Jack R. Newman, Esquire

SAFETY EVALUATION

Introduction

This safety evaluation supports a proposed revision to Technical Specification 6.8.3.c which would extend the time limit for Plant Nuclear Safety Committee (PNSC) review and Plant Superintendent-Nuclear approval of temporary changes to procedures from 7 days to 14 days.

Discussion

Plant activities are conducted in accordance with preplanned methods which are described in approved procedures. Periodically these procedures need to be revised. There are two methods by which this can be done. First, procedures can be changed by PNSC review and Plant Superintendent review and approval prior to the change taking effect. This is the method used for almost all procedure changes. Second, procedures can be changed more quickly, if necessary, by using the temporary change option permitted by Technical Specification 6.8.3. This method is provided in case a relatively rapid procedure change is needed to allow for handling conditions beyond the scope of the original procedure, to prevent an unnecessary delay in operation or maintenance, or to handle conditions encountered in implementing a procedure which were not anticipated when the procedure was first written. Both of the procedure change methods described above are authorized by approved plant procedures which have been reviewed by NRC Office of Inspection and Enforcement compliance inspectors.

A temporary change is made only if it does not change the intent of the procedure, does not conflict with other facility requirements, does not adversely affect nuclear safety, and is approved by at least two authorized members of the plant management staff. The Plant Nuclear Safety Committee (PNSC) then reviews the temporary change at a later date. The PNSC can then cancel the temporary change, modify it, or establish it as a permanent change. The Plant Superintendent-Nuclear then acts upon the Committee's recommendations regarding the temporary change.

Since it is implicitly understood that performance of an approved procedure does not involve an unreviewed safety question, then any temporary change to that procedure which does not change the intent of the procedure also does not involve an unreviewed safety question. Therefore, a written safety evaluation is not required prior to on-the-spot approval of a temporary change and the PNSC is not required to act immediately to review it. Under the current Turkey Point Technical Specifications, the PNSC is allowed 7 days to review temporary changes. However, the Standard Technical

Specifications (STS) for Westinghouse Pressurized Water Reactors, dated October 1, 1975, permit as much as 14 days for review of temporary changes. The difference between a PNSC review 7 days after a temporay change is not significant. Florida Power & Light Company requests authorization to utilize the longer time frame permitted by the STS in order to establish greater flexibility in scheduling PNSC meetings.

CONCLUSIONS

The requested change is administrative in nature and does not involve any physical change to the facility, nor does it represent a significant deviation from present operating philosophy. Based on the above considerations, (1) the proposed change does not increase the probability or consequences of accidents or malfunctions of equipment important to safety and does not reduce the margin of safety as defined in the basis for any technical specification, therefore, the change does not involve a significant hazards consideration; and (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PNSC and approved by the Nuclear Plant Superintendent prior to implementation and periodically as provided by procedure.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two menbers of the plant management staff, at least one of whom holds a Senior Operator License on the unit affected.

c. The change is documented, reviewed by the PNSC and approved by the Plant Superintendent - Nuclear within fourteen days of implementation.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

E. A. Adomat, being first duly sworn, deposes and says:

That he is Executive 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.

E. A. Adomat

E. A. Adomat

Subscribed and sworn to before me this 21 day of October, 1976

Helen L. Carson

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

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES NOV. 30 1979
BONDED THRU GENERAL INS. UNDERWRITERS

My commission expires: