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50-250/251

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FILE NUMBER

TO: Mr. Victor Stello

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

DATE OF DOCUMENT
12/15/77

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12/19/77

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3 signed

DESCRIPTION

ENCLOSURE

License No. DPR-31 and DPR-41 Appl for Amend:
tech specs proposed change concerning maximum
allowable pressurizer heatup rate....notorized
12/15/77.....

PLANT NAME: Turkey Point Units 3 & 4
RJL 12/21/77 (2-P)

(2-P)+(1-P)

40 ENCL.

SAFETY FOR ACTION/INFORMATION

BRANCH CHIEF: (7)

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FLORIDA POWER & LIGHT COMPANY
December 15, 1977
L-77-379

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.

A recent review has shown an inconsistency between the maximum allowable pressurizer heatup rate specified by certain NSSS documents and the heatup rate allowed by the Turkey Point Technical Specifications. The Technical Specifications allow a pressurizer heatup rate of 200 °F in any one hour, whereas the correct maximum allowable pressurizer heatup rate is 100 °F/hr. The maximum allowable pressurizer cooldown rate remains at 200 °F in any one hour. The correct heatup and cooldown rates for the pressurizer are based on information contained in the NSSS Design Transient Document and the Pressurizer Equipment Specifications.

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 3.1-2

The maximum allowable pressurizer heatup rate in Specification 3.1.2 is changed from "200 °F in any one hour" to "100 °F in any one hour".

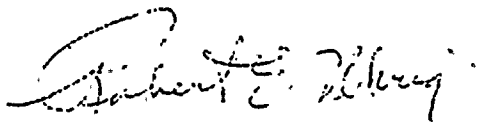
The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power & Light Company Nuclear Review Board. They have concluded that it does



not involve an unreviewed safety question. A written safety evaluation is attached.

This proposal is responsive to an October 13, 1977 letter from Mr. George Lear of your staff requesting that we submit a request to amend our Technical Specifications to provide a limit of 100°F/hour on the rate of pressurizer heatup. FSAR Section 4.2.2, page 4.2-4 and FSAR Section 4.2.6, page 4.2-15 both state that the pressurizer and heaters are both sized for a 55°F/hour heatup rate. Therefore, we conclude that a 100°F/hour pressurizer heatup rate has not been exceeded at Turkey Point Units 3 and 4.

Very truly yours,



Robert E. Uhrig
Vice President

REU/MAS/lah

Attachment

cc: Mr. James P. O'Reilly, Region II
Robert Lowenstein, Esquire

2. PRESSURE-TEMPERATURE LIMITS

The Reactor Coolant System (except for the pressurizer) pressure and temperature shall be limited during heatup, cooldown, criticality (except for low power physics tests), and inservice leak and hydrostatic testing in accordance with the limit lines shown on Figures 3.1-1a through 3.1-1b. Allowable pressure-temperature combinations are BELOW AND TO THE RIGHT of the lines on the Figures. Heatup and cooldown rate limits are:

- a. A maximum heatup rate of 100 °F in any one hour.
- b. A maximum cooldown rate of 100 °F in any one hour.
- c. A maximum temperature change of ≥ 5 °F in any one hour during hydrostatic testing operation above system design pressure.

The pressurizer pressure and temperature shall be limited in accordance with the following:

- d. The pressurizer shall be limited to a maximum heatup rate of 100 °F in any one hour, and a maximum cooldown rate of 200 °F in any one hour.
- e. The pressurizer shall be limited to a maximum Reactor Coolant System spray water temperature differential of 320 °F.

With any of the above limits exceeded, restore the temperature and/or pressure within the limits within 30 minutes; determine that the RCS or pressurizer remains acceptable for continued operations or, if at power, be in at least Hot Shutdown within the next 6 hours and Cold Shutdown within the following 30 hours.

The reactor shall not be made critical unless the moderator temperature coefficient is zero or negative. When the coefficient is greater than zero, the reactor shall be subcritical by an amount equal to or greater than the potential reactivity insertion due to depressurization. These moderator temperature coefficient conditions do not apply to low power physics tests.

SAFETY EVALUATION

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Pressurizer Heatup Rate

I. Introduction

This evaluation supports a proposed change to Specification 3.1.2.d. The maximum allowable pressurizer heatup rate is revised from "200 °F in any one hour" to "100 °F in any one hour".

II. Evaluation

This proposed change is the result of a letter from our NSSS vendor advising us that the correct maximum allowable pressurizer heatup rate, based on information contained in the NSSS Design Transient Document and the Pressurizer Equipment Specifications, is 100 °F/hr. This is conservative with respect to the current Technical Specification limit of 200 °F in any one hour.

Functionally, no corrective action has been required because it is not possible to attain a pressurizer heatup rate of 100 °F/hr. during any normal evolution. Administratively, licensed operators have been made aware of the correction, and this Technical Specification amendment is proposed as the final corrective action.

This occurrence was reported to the NRC as Reportable Occurrences 250-77-7 and 251-77-7 dated September 2, 1977. The two reports are basically identical. RO 250-77-7 is attached for information.

III. Conclusion

Since the proposed amendment is administrative in nature and conforms to applicable design documents, (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, (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.



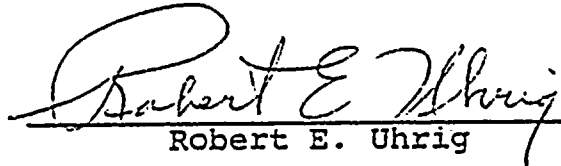
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STATE OF FLORIDA)
)
) SS.
COUNTY OF DADE)

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 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

15th day of December, 1977



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

My commission expires:

NOTARY PUBLIC STATE OF FLORIDA # 14333
MY COMMISSION EXPIRES AUGUST 25, 1981
BONDED THRU MARYLAND BONDING AGENCY

