



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 21, 2021

Mr. Dean Curtland
Vice President, Nuclear
Florida Power & Light Company
15430 Endeavor Drive
Jupiter, FL 33478

SUBJECT: TURKEY POINT NUCLEAR PLANT, UNITS 3 AND 4 – SUPPLEMENTAL
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSE
AMENDMENT REQUEST CONCERNING TECHNICAL SPECIFICATION
CONVERSION TO NUREG-1431, REVISION 5 (EPID L-2021-LLI-0002)

Dear Mr. Curtland:

By letter dated September 22, 2021 (Agencywide Documents Access and Management System (ADAMS) No. ML21265A370), Florida Power and Light Company (FPL, the licensee) submitted a license amendment request for Turkey Point Nuclear Plant, Units 3 and 4 (Turkey Point). The proposed amendment would revise the current technical specifications to reflect adoption of NUREG-1431, "Standard Technical Specifications – [Westinghouse Electric Company] Westinghouse Plants," Revision 5. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request.

The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements for the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that FPL supplement the application to address the information requested in Enclosure 1 by January 19, 2022. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its activities associated with the

application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Bill Maher of your staff on December 14, 2021. Additionally, in Enclosure 2, the NRC staff has included a list of editorial issues. The items in Enclosure 2 are included for your information only.

If you have any questions, please contact Michael Mahoney at (301) 415-3867 or Michael.Mahoney@nrc.gov.

Sincerely,

/RA/

Michael Mahoney, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-250 and 50-251

Enclosure:

1. Supplemental Information Needed
2. Identified Editorial Issues

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED
LICENSE AMENDMENT REQUEST FOR
CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS
FLORIDA POWER AND LIGHT COMPANY
TURKEY POINT NUCLEAR PLANT, UNIT NOS. 3 AND 4
DOCKET NOS. 50-250 AND 50-251

NOTE: All page numbers are taken from the Adobe count for the associated document in the Agencywide Documents Access and Management System (ADAMS).

SECTION SPECIFIC

Volume 6 – Section 3.1 (ADAMS Accession No. ML21265A377)

1. ITS 3.1.1 - page 18 – The markup of the STS Bases for ITS Subsection B 3.1.1 does not include an ASA section passage about reactivity excursion transients resulting from reactor coolant pump (RCP) start. The markup of the ASA section of the Bases for STS Subsection 3.1.1, indicates that justification for deviations (JFDs) 1 and 5 apply to this omission. Provide an explanation of whether this transient is included as an analyzed transient in the Updated Final Safety Analyses Report (UFSAR), and if the passage is valid for Turkey Point.

Volume 8 – Section 3.3 (ADAMS Accession No. ML21265A379)

1. On page 168/499, provide an explanation for why the L01 discussion does not address why the qualifier “and [de activated]” is not incorporated into note g. Without an acceptable justification, this change may be considered a beyond scope item (BSI) because NUREG-1431 assumes the valves are closed and rendered incapable of being open, which is denoted by the [de activated] to allow for a plant specific term. The “and” is not in brackets.
2. On page 169/499, provide an explanation for why the L02 discussion does not address why the qualifier “and [de activated]” is not incorporated into note h. Without an acceptable justification, this change may be considered a BSI because NUREG-1431 assumes the valves are closed and rendered incapable of being open, which is denoted by the [de activated] to allow for a plant specific term. The “and” is not in brackets.
3. On page 172/499, Discussion of Changes (DOC) L06 appears to propose a Condition where the limiting condition for operation (LCO) is not met that does not currently exist in NUREG-1431. Provide an explanation in DOC L06 on whether or not this condition currently exists in NUREG-1431 as well as what the CTS for restoration of the inoperable train is in NUREG-1431.
4. On page 288/499, LA03 justifies deletion of the footnote at the bottom of CTS TABLE 4.3-4 by stating, in part: “Also, this change is acceptable because these types of procedural details will be adequately controlled in the ITS Bases.” However, the proposed bases for ITS 3.3.3 do not mention where criteria for calibration of the Containment Area Radiation

(High Range) monitor is located. The final policy statement on TS Improvements for Nuclear Power Reactors states that licensees should identify the location of and controls for the relocated technical and administrative requirements. Provide the location of the details proposed for removal.

5. On page 450/499, the Final Policy Statement on TS Improvements for Nuclear Power Reactors states "When licensees submit amendment requests based on this Policy Statement, they should identify the location of and controls for the technical and administrative requirements of the relocated requirements." The DOCs for CTS 3.3.3.2 R01 do not state where requirements for the movable instrument drive system (MIDS) will be relocated or change controls that would apply. Provide information on where the relocated requirements will be located and the change controls that will apply.
6. On page 335/499, the Note (Separate Condition entry is allowed for each Function) above the ITS 3.3.4 Actions Table is not referenced to CTS and there is no DOC for it. Provide an explanation for this change.
7. On page 336/499, ITS 3.3.4 Required Action B.2 has a proposed 7-day CT modified from the ITS "immediately" CT. The referenced CTS Table 3.3-2 Action 24B.1 (page 326/499) has an "immediately" CT. Provide justification for this beyond scope item that is not in CTS or Improved Standard Technical Specifications (ISTS).
8. On page 425/499, ITS Table 3.3.6-1 Function 2 has "N/A" for its Surveillance Requirements (SRs), consistent with CTS. Provide a discussion on how LCO 3.3.6 will be met without demonstrating operability via SRs.

Volume 9 – Section 3.4 (ADAMS Accession No. ML21265A380)

1. On page 7, per LA01, CTS SR 4.2.5.3 is proposed to be relocated to the Technical Requirements Manual (TRM). Provide a justification to why the subject SR is not required to be performed to verify LCO 3.4.1 is met.
2. On page 8/456, L01 states: "CTS 3.2.5 ACTION requires THERMAL POWER to be reduced to less than 5% of RTP within the next 4 hours if the DNB parameters are not restored to within limit in 2 hours. ITS 3.4.1 ACTION B requires the power reduction to less than or equal to 5% RTP (MODE 2) within the next 6 hours if the DNB parameters are not restored to within limit in 2 hours." L01 further states, "This change is designated as less restrictive because additional time is allowed to restore parameters to within the LCO limits than was allowed in the CTS." Since there is no change in the design and operation of the Turkey Point units, provide plant specific technical justification for extending the time from current 4 hours to 6 hours.
3. On page 49/456, CTS SR 4.4.9.1.1 (ITS SR 3.4.3.1), provide justification for the deletion of "specified in the PTLR."
4. On page 89/456, provide an explanation for why the proposed changes to LCO 3.4.5, Conditions C and D and associated Required Actions do not follow the STS format.

Volume 10 – Section 3.5 (ADAMS Accession No. ML21265A381)

1. ITS - 3.5.1 – pages 5, 9, 12, 21, and 25 - The proposal is to change the Completion Time for CTS 3.5.1 Action a. from 1 hour to 24 hours, consistent with STS 3.5.1 Action B and WCAP-15049-A. Provide an explanation on the applicability of WCAP-15049-A to Turkey Point and intended implementation of any limitations and/or conditions for applying this topical report.
2. ITS - 3.5.2 – page 35 - CTS SR 4.5.2 g.1 requires the position stops for emergency core cooling system (ECCS) throttle valves be verified to be in the correct position within 4 hours following completion of each valve stroking operation or maintenance on the valve when the valve is required to be OPERABLE. The proposed ITS does not contain this requirement. This changes the CTS by eliminating the requirement from TS. Provide a justification for eliminating this requirement from TS.
3. ITS 3.5.2 – page 49 - for SR 3.5.2.8, the licensee is relocating information from their CTS that deviates from the STS into their Bases. However, the submittal does not indicate that information in the CTS SR is being moved to the ITS bases regarding SR 3.5.2.8. Provide a justification for the proposed change and relocation.
4. ITS 3.5.2 – page 55 - In last paragraph of the background section of the Bases for ITS 3.5.2, the licensee refers to other LCOs. The licensee points to containment sump and provides a correction indicating LCO 3.6.19, “Containment Sump” of STS is LCO 3.6.8 for the plant-specific TS. However, the ITS Section 3.6 volume of Enclosure 2 of the application indicates that Turkey Point is not adopting the containment sump TS. Provide a justification for the proposed change and relocation and the deviation from NUREG-1431.
5. ITS 3.5.3 – page 76 - CTS 3.5.3 ACTION a. allows one hour to restore an ECCS flow path from the refueling water storage tank (RWST) and, if it cannot be restored, requires a cooldown to COLD SHUTDOWN. ITS 3.5.3 requires an immediate initiation of Action to restore the ECCS train. This changes CTS by eliminating a cooldown requirement if the flow path cannot be restored. While the “be in cold shutdown” portion being removed appears less restrictive, the completion time is more restrictive (immediate versus 1 hour). Provide a justification for why this is characterized as less restrictive instead of more restrictive.
6. ITS 3.5.4 – page 97 - The change to the CTS markup is to increase the COMPLETION TIME for restoration of an inoperable refueling water storage tank (RWST) due to boron concentration or temperature not within limits from 1 hour to 8 hours. In DOC L01, the licensee indicated that 1 hour is not sufficient to address changes in boron concentration and/or temperature. Provide a justification that supports the completion time change (i.e., 8-hour).

Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A382)

1. ITS 3.6.2 - page 34 – CTS markup of SR 4.6.1.3.a (related to containment air locks) points to ITS SR 3.6.2.1 as the ITS SR that meets CTS SR 4.6.1.3.a requirements. However, ITS SR 3.6.2.1 does not appear to fully meet the requirements of CTS SR 4.6.1.3.a (i.e., it is missing: “Following each closing, ... by verifying that the seals have not been damaged ... by vacuum testing...”) and there is no DOC associated with CTS SR 4.6.1.3.a that

addresses ITS omission of this requirement. Provide justification for the missing requirement to verify no seal damage by vacuum testing.

2. ITS 3.6.3 - page 65 – The CTS markup DOC A07 description refers to containment air locks while the DOC A07 subject (CTS SR 4.6.1.7.2) appears to be limited to containment purge and exhaust valves. Provide a discussion for the proposed change to the containment air locks.
3. ITS 3.6.3 - page 82 – The ISTS 3.6.3 markup references DOC L02 in the left margin near Condition C (insert 2). It is not clear that DOC L02 applies because it appears that DOC L02 is limited to penetration flow paths with two containment isolation valves (Condition A), whereas Condition C is applicable to penetration flow paths with only one containment isolation valve and a closed system. Provide a justification for the applicability of DOC L02 to Condition C (insert 2).
4. ITS 3.6.6 - pages 160, 163 – DOCs L01 and L05 (containment spray and containment cooling, respectively) discuss changes to the CTS that would permit a Required Action end state of HOT SHUTDOWN (MODE 4) rather than an end state of COLD SHUTDOWN (MODE 5). For specific TS conditions, TSTF-432 and Westinghouse Topical Report WCAP-16294-A R1 (ADAMS Accession No. ML103430249) justifies MODE 4 as an acceptable alternate end state to MODE 5. The WCAP states that the containment spray and containment cooling systems are designed for accident conditions initiated at power. One train of each system satisfies the assumptions in the safety analyses and one train of containment spray is required to satisfy assumptions regarding iodine removal. If one train of either containment spray or containment cooling is inoperable the other train is available to mitigate the accident along with both trains of the other system. If both trains of containment cooling are inoperable, containment spray can serve as the cooling system and it also serves to remove iodine. Therefore, sufficient defense-in-depth is maintained when the end state is changed from MODE 5 to MODE 4.

ITS 3.6.6 JFD 4 explains that the redundancy in cooling capability is no longer available due to power uprate and one containment spray train and two emergency containment cooling units are required to provide post-accident cooling. Turkey Point Units 3 and 4 design for containment spray and containment cooling differs from the STS design assumed in the TSTF-432 and WCAP-16294-A.

Given that the containment spray and containment cooling design differ from the systems, structures, or component (SSC) design assumed in the STS (TSTF-432 and WCAP-16294), provide an explanation for how TSTF-432 and WCAP-16294 justify these less restrictive changes for ITS 3.6.6, as described in DOCs L01 and L05.

5. ITS Bases 3.6.5 - page 145 – ITS Bases B 3.6.5 ASA section STS markup inserts temperature values without justification. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated temperature information.
6. ITS Bases 3.6.6 - page 179 – ITS Bases 3.6.6 ASA markup changes containment “High-3” pressure setpoint to containment “High-2” pressure setpoint. Provide the UFSAR reference that supports the selection for the “High-2” pressure setpoint.
7. ITS Bases 3.6.6 - page 180 – ITS Bases B 3.6.6 discussion of Required Action A.1 refers to “... the redundant heat removal capability afforded by the Containment Spray System, ...”

However, based on ITS 3.6.6 JFD 4 (page 171), it appears that redundancy in heat removal is afforded by combinations of containment spray and emergency containment cooling units. Provide an explanation that addresses which system(s) afford heat removal capability in this context.

Volume 13 – Section 3.8 (ADAMS Accession No. ML2165A384)

1. ITS 3.8.1 - page 19/419 – On ITS 3.8.1 discussion of change (DOC) page 3 of 17, DOC M01 describes Actions in Mode 1. There is also a less restrictive change which is missing a discussion of the change. In Modes 2, 3, and 4, CTS action a.5 requires restoration of the inoperable startup transformer within 24 hours. This is less than the Completion Time of 72 hours allowed in ITS. Provide a DOC for this less restrictive change.
2. ITS 3.8.1 - page 23 – On discussion of changes (DOC) page 7 of 17 of ITS 3.8.1, DOC LA05 states that the removal of CTS 4.8.1.1.2.a.6, from the Technical Specifications is acceptable because this type of information is not necessary to be included in the TS to provide adequate protection of public health and safety. DOC LA05 also states that an OPERABLE Emergency Diesel Generator (EDG) must be capable of providing power to the associated emergency bus as indicated in the Bases. ITS 3.8.1 LCO b is the requirement for EDGs to be capable of supplying the onsite Class 1E power distribution subsystem therefore the details of CTS 4.8.1.1.2.a.6 are not being removed from TS. Provide a revised discussion of change for CTS 4.8.1.1.2.a.6.
3. ITS 3.8.1 - page 25 – On ITS 3.8.1 discussion of change (DOC) page 9 of 17, DOC L01 states, “CTS ACTIONS a.3.b. a.4, a.5, b.3, d.1, e.2, and f, in part, require that if the associated Action and Completion time are not met to be ... in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours...” However, the action to be in HOT Standby within the next 12 hours and in HOT SHUTDOWN within the following 6 hours does not seem to apply to any of the listed CTS Actions. Provide an explanation to why this action is listed in DOC L01 or revise DOC L01.
4. ITS 3.8.1 – page 37 - On ITS 3.8.1 page 3.8.1-2, it shows Insert 3 being added between Required Action E.1 and the logical connector “AND.” On ITS 3.8.1 Insert Page 3.8.1-2b, Insert 3 shows Required Action E.2 followed by a logical connector “AND” As proposed, this would have Required Action E.1 on top of Required Action E.2 without a logical connector between them and would have two “AND” logical connectors between Required Action E.2 and Required Action E.3. As proposed, this change is not consistent with ISTS format. Provide a revision that is consistent with ISTS format.
5. ITS 3.8.1 = page 40 – On ITS 3.8.1 page 3.8.1-3, the completion time for Required Action F.2 states, “24 hours [OR In accordance with Risk Informed Completion Time Program],” and the proposed change deletes the brackets. However, license amendment numbers 284 and 278 did not approve a RICT for CTS 3.8.1.1 Action e. Therefore, remove “or in accordance with the Risk Informed Completion Time Program” from the Completion Time for ITS 3.8.1 Required Action F.2, as it is not consistent with license amendment numbers 284 and 278.
6. ITS 3.8.1 - page 42 – On ITS 3.8.1 page 3.8.1-4, ITS 3.8.1 Condition I is entered when one automatic load sequencer is inoperable and Required action I.1 has a required completion time of 72 hours or in accordance with the Risk Informed Completion Time. CTS 3.8.1.1 does not have a specific Action for an inoperable automatic load sequencer and therefore, was not evaluated under license amendment numbers 284 and 278 for Units 3 and 4,

respectively. For ITS 3.8.1 required action I.1 provide the following information: (1) the success criteria parameters used to determine PRA functional determination are the same as the design-basis success criteria parameters or, if different, plant-specific analyses used to support the PRA are justified; (2) identify how the load sequencers are implicitly or explicitly modeled in the PRA; (3) CCFs and/or surrogate identification; and (4) the Configuration Risk Management Program (CRMP) provides the capability to select the load sequencers as out-of-service in order to calculate a RICT.

7. ITS 3.8.1 - page 42 – On ITS 3.8.1 insert page 3.8.1-4, Condition J Note states, “Condition J *only applies* [emphasis added] to one Unit during a dual Unit shutdown.” Condition Note K.1 states, “Condition K *only applies* when a dual Unit shutdown is required.” Condition Note K.2 states, “Only one Unit can enter Condition K.” The above Condition Notes are written such that they do not allow for a single Unit that doesn't meet the Required Action Completion Times for shutdown, they drive a single unit to LCO 3.0.3.
8. ITS 3.8.1 - page 48, 103 – On ITS 3.8.1 Insert page B 3.8.1-18, Insert 18 states, “...SR [3.8.1.6] is modified by a Note to indicate that all EDG starts for this Surveillance may be preceded by an engine pre-lube period and followed by a warmup period prior to loading.” However, the SR Note is missing from ITS SR 3.8.1.6. Add the Note to ITS SR 3.8.1.6 or change the ITS Bases to be consistent with SR 3.8.1.6.
9. ITS 3.8.1 - page 63 – On ITS 3.8.1 page 3.8.1-15, Note 1 in SR 3.8.1.14 that states, “Momentary transients outside of load range do not invalidate this test.” The proposed change to Note 1 replaces “test” with “pre-test requirement.” The proposed change no longer allows momentary transients outside the load range *for SR 3.8.1.14* and now applies to the pre-test requirement in Note 1. JFD 5 provides the basis for adding the momentary transients outside the load range to the pre-test requirement but does not provide the basis for removing the momentary transients outside the load range for *SR 3.8.1.14*. Provide an explanation for the basis for removing the momentary transient Note from *SR 3.8.1.14*, instead of adding the pre-test requirement to the already written STS SR 3.8.1.14 Note 1, therefore applying it to both.
10. ITS 3.8.1 - page 72 – On ITS 3.8.1 Bases page B 3.8.1-1, it states, “Offsite power is supplied to the unit switchyard(s) from the transmission network by 10 transmission lines.” However, Turkey Point's UFSAR Section 8.2.1 states, “The switchyard is connected to Florida Power and Light Company's transmission network through nine 240 kV circuits as shown on Figure 8.2-2.” Provide an explanation for the discrepancy on the number of transmission lines and/or circuits.
11. ITS 3.8.1 - page 80 – On ITS 3.8.1 Bases page B 3.8.1-5, JFD 1 is applied to the proposed addition of “a qualified” to the offsite source. ITS 3.8.1 Bases JFD 1 state that changes are made to the improved standard technical specifications Bases that reflect the plant-specific nomenclature, number, reference, system description, analysis, or licensing basis description. Provide an explanation on how ITS 3.8.1 Bases JFD 1 applies to this change.
12. ITS 3.8.1 - page 87 – On ITS 3.8.1 Bases Insert Page B 3.8.1-8b, insert 11 for Required Action E.5 states, “The Required Actions have been modified by a Note. The Note states that Required Actions E.2 and E.3 are not applicable for Unit 4 when the required Unit 3 EDG is declared inoperable by LCO 3.8.3 Condition F.” ITS 3.8.1 Required Actions E.2 and E.3 are not modified by a Note stating that they are not applicable for Unit 4 when the required Unit 3 EDG is declared inoperable by LCO 3.8.3, Condition F. Remove the

discussion of the Note from insert 11 or provide the proposed Note and its JFD in ITS 3.8.1 Required Actions E.2 and E.3 as discussed in Bases insert 11.

13. ITS 3.8.1 - page 121 – On ITS 3.8.1 Bases page B 3.8.1-29 it discusses that SR 3.8.1.13 is modified by three Notes, a portion of this discussion related to Note 2 is deleted, and the justification for the proposed deletion is Bases JFD 5. Bases JFD 5 discusses SR 3.8.1.2 and SR 3.8.1.7. Provide an explanation of how JFD 5 applies to this change.
14. ITS 3.8.1 - page 140 – On CTS page 3/4 8-11, it is proposed that “operations involving CORE ALTERATIONS” be deleted from the CTS 3.8.1.2 Action statement. However, the proposed change does not have a discussion of change associated with it. In STS this Required Action was deleted under TSTF-471. In order to delete CORE ALTERATIONS from CTS, provide a description of the limitations and controls that would prevent movement of any unirradiated fuel assembly, source, reactivity control component, or other component affecting reactivity within the reactor vessel capable of damaging an irradiated fuel assembly prior to the 72 hour decay time assumed in the Fuel Handling Accident (FHA) analysis or information demonstrating that the dropping of any unirradiated fuel assembly, sources, reactivity control component, or other component affecting reactivity within the reactor vessel onto irradiated fuel assemblies prior to the 72 hour decay time assumed in the FHA will not result in a radioactive release from the irradiated fuel.
15. ITS 3.8.1 - page 140 – On CTS page 3/4 8-11, the CTS markup states that the Applicability of CTS 3.8.1.2 is Modes 5* and 6* and deletes footnote * which states, “Caution - If the opposite unit is in MODES 1, 2, 3, or 4 see Specification 3.8.1.1.” The markup of CTS 3.8.1.2 shows LA01 pointing to footnote *. However, on ITS 3.8.2 discussion of change page 2 of 5, it states that there are no removed detail changes. Provide the discussion of change for deleting footnote *.
16. ITS 3.8.1 - page 143 – On ITS 3.8.2 DOC page 2 of 5, DOC L01 discusses CTS 3.8.1.2 Action requirement to depressurize and vent the reactor coolant system (RCS) through a greater than or equal to 2.2 square inch vent within 8 hours, when less than the minimum required alternating current (AC) electrical power sources are operable. Proposed ITS 3.4.12 provides overpressure mitigation systems, which aligns with a portion of the CTS 3.8.1.2 Action. CTS 3.8.1.2 Action also addresses water inventory in the RCS if less than the minimum required AC electrical sources are operable and requires increasing RCS inventory as soon as possible if in Mode 5 with the reactor coolant loops not filled, or in Mode 6 with water level less than 23 feet above the reactor vessel flange. This portion of CTS 3.8.1.2 Action appears to be deleted from Turkey Point’s technical specifications. Provide the technical basis addressing deletion of the RCS water inventory for the specified conditions in Mode 5 and 6.
17. ITS 3.8.1 - page 175 – On ITS 3.8.3 discussion of change (DOC) page 3 of 6, DOC M02 states, “ITS SR 3.8.3.4 requires verification that the required starting air receiver pressure is > 210 psig [pounds per square inch gauge] for each EDG. The proposed ITS SR 3.8.3.4 value, 212 psig for Unit 3 and 195 psig for Unit 4, will ensure the five-diesel air start requirement is met.” However, proposed ITS SR 3.8.3.4 requires verifying each EDG air start receiver pressure is greater than or equal to 195 psig for Unit 3 and 185 psig for Unit 4. Provide an explanation of the difference in values in M02 and ITS SR 3.8.3.4.
18. ITS 3.8.1 - page 181 – On ITS 3.8.3 Insert Page 3.8.3-1, insert 1, states, “...If the diesel fuel oil system is not returned to service within 10 days, LCO 3.8.1 Required Actions E.1, E.4, and E.5 apply to Unit 4 and LCO 3.8.2 ACTIONS apply to Unit 3.” This proposed Note

seems to limit which LCO 3.8.1 required actions should be entered for Unit 4. If the diesel fuel oil system is not returned to service within 10 days, provide an explanation for why LCO 3.8.1 Required Actions E.2 and E.3 are left out of this Note (i.e., why the Note does not point to entering LCO 3.8.1 Condition E for Unit 4) or to entering LCO 3.8.3 Condition F.

19. ITS 3.8.1 - page 182 – On ITS 3.8.3 page 3.8.3-2, ITS 3.8.3 Condition E is modified to state, “One or more EDGs with required starting air receiver pressure < 5 start air pressure and > 160 psig.” On ITS 3.8.3 Bases page B 3.8.3-4, ITS Condition E.1 states, “With starting air receiver pressure < 212 psig (1 air start set available) or < 195 psig (2 air start sets available) for Unit 3 and < 195 psig (1 air start set available) or < 185 psig (2 air start sets available) for Unit 4, sufficient capacity for five successive EDG start attempts does not exist.” On ITS 3.8.3 page 3.8.3-3, ITS SR 3.8.3.4 states, “Verify each EDG air start receiver pressure is > 195 psig for Unit 3 and > 185 psig for Unit 4.” In ISTS the bracketed air pressure in SR 3.8.3.4 is that which represents the 5 air start pressure, and it matches the less than bracket air pressure stated in ISTS 3.8.3 Condition E. The five start air pressure is consistent between the ISTS SR and Condition E, therefore it is clear when Condition E must be entered. As proposed ITS 3.8.3.4 and ITS 3.8.3 Condition E are not consistent and therefore it is not clear to the NRC staff when Condition E would be entered. In addition, ITS 3.8.3 JFD 1 and JFD 2 does not explain what is “required” nor does it explain why “5 start air pressure” was added instead of inserting the air pressure for 5 starts for Units 3 and Unit 4. Provide a revision to ITS 3.8.3 such that ITS SR 3.8.3.4 matches ITS 3.8.3 Condition E, and the numerical values are contained in ITS SR 3.8.3.4. In addition, provide a JFD that explains the corresponding changes.
20. ITS 3.8.1 - page 183 – On ITS 3.8.3 page 3.8.3-3, ITS SR 3.8.3.4 verifies each EDG air start receiver pressure is greater than or equal to 195 psig for Unit 3 and 185 psig for Unit 4 and has a required surveillance frequency of 31 days or in accordance with the Surveillance Frequency Control Program. CTS 3.8.1.1 and CTS 3.8.12 does not have a specific SR for air start receiver pressure and therefore, was not evaluated under license amendment numbers 263 and 258 for Units 3 and 4, respectively. For ITS SR 3.8.3.4, provide the following information: (1) The new SR base surveillance frequency interval for inclusion into the surveillance frequency control program; (2) Discussion of whether the new surveillance test interval can be modeled in the plant specific PRA; (3) A discussion of the request to include the new SR into the previously approved surveillance frequency control program (ADAMS Accession No. ML15166A320); and, (4) An implementation schedule (e.g., the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment) for the new SR interval. Provide a technical evaluation that discusses the above information and provide the implementation schedule for the new SR interval and why it is appropriate.
21. ITS 3.8.1 - page 193 – CTS 6.8.4.e, “Diesel Fuel Oil Testing Program,” establishes the total particulate concentration of the fuel oil is less than or equal to 10 mg/liter when tested every 31 days in accordance with either American Society for Testing and Materials (ASTM) D-2276 or ASTM D-5452. Proposed ITS 5.5.10, “Diesel Fuel Oil Testing Program,” establishes total particulate concentration of the fuel oil is less than or equal to 10 mg/l when tested in accordance with the Surveillance Frequency Control Program in accordance with either ASTM D-2276 or ASTM D-5452. On ITS 3.8.3 Bases page B 3.8.3-7, a paragraph describing particulate concentrations is proposed to be deleted. In addition, on ITS 3.8.3 Bases page B 3.8.3-9, reference to ASTM D5452 is deleted and ASTM D-2276 is not added. Provide an explanation for why this paragraph discussing particulate

concentrations has not been updated with the plant-specific information for Turkey Point's Units 3 and 4 and has been chosen to be deleted.

Volume 14 – Section 3.9 (ADAMS Accession No. ML21265A385)

1. ITS 3.9.3 – page 127-132 – Provide a justification for relocating CTS LCO 3.9.3 for decay time to the TRM including an evaluation under 10 CFR 50.36(c)(2)(ii)(B).

Volume 16 - Section 5.5 (ADAMS Accession No. ML21265A387)

1. ITS 5.5.9 - pages 67 and 94 – STS 5.5.9.c addresses provisions for gas decay tank explosive gas and radioactivity monitoring program. However, this item is missing from ITS 5.5.9, and no justification has been provided. Provide an appropriate justification for not including the item.

EDITORIAL ITEMS IDENTIFIED

CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS

FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT NUCLEAR PLANT, UNITS 3 AND 4

DOCKET NOS. 50-250 AND 50-251

General

Volumes 2, 4,7, 14, and 15 of Enclosure 2 to the submittal dated September 22, 2021 cites consistency with "NUREG-1432, Revision 5.0." As NUREG-1432 applies to Combustion Engineering Plants and the remaining volumes reference NUREG-1431, "Westinghouse Plants, Revision 5 STS," identify which NUREG the cited volumes are intended to be compared against.

Volume 6- Section 3.1

1. ITS 3.1.1 – pages 5, 8, 9, 235, 236 - The application describes the removal of CTS 3/4.10.1, "Special Test Exception - Shutdown Margin," as More Restrictive in DOC M01, and not as a Relocated LCO. DOC M01 states in part "... This change is acceptable because this method of testing is no longer used. As a result, the CTS special test exception is not needed. Other rod worth measurement techniques that do not violate the SHUTDOWN MARGIN requirements are used. This change is designated as more restrictive because an exception to the CTS is being deleted." The MODE 2 Applicability of LCO 3.1.1.1, "SDM," is annotated with an asterisk * footnote, which states "See Special Test Exceptions Specification 3.10.1." DOC A04 states in part, "ITS 3.1.1 does not contain the footnote or a reference to the Special Test Exception. The purpose of the footnote reference is to alert the user that a Special Test Exception exists that may modify the Applicability of the Specification. It is an ITS convention to not include these types of footnotes or cross-references. This change is designated as administrative as it incorporates an ITS convention with no technical change to the CTS." CTS LCO 3.10.1 states, "The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 may be suspended for measurement of control rod worth and SHUTDOWN MARGIN provided reactivity equivalent to at least the highest estimated control rod worth is available for trip insertion from OPERABLE control rod(s)," with an Applicability of MODE 2. Revise Enclosure 2 Volume 6 to associate the removal of CTS 3/4.10.1 and its DOC M01 with the CTS markup of CTS 3/4.1.1.1 for ITS 3.1.1 because it is an exception to CTS LCO 3.1.1.1 SDM core operating limit report (COLR) limits.
2. ITS 3.1.1 - pages 73, 111, 118, 132 – Please provide an explanation for why Enclosure 2, Volume 6 does not need to be revised to associate the removal of CTS 3/4.10.2 and its DOC M01 with the CTS markup of:

- CTS 3.1.3.1 "Moveable Control Assemblies - Group Height," MODES 1 and 2 for ITS 3.1.4; "Rod Group Alignment Limits";
- CTS 3.1.3.5 "Shutdown Rod Insertion Limit," MODES 1 and 2, for ITS 3.1.5, "Shutdown Bank Insertion Limits";
- CTS 3.1.3.6 "Control Rod Insertion Limits" MODES 1 and 2 for ITS 3.1.6, "Control Bank Insertion Limits"; and
- CTS 3.2.4 "QUADRANT POWER TILT RATIO," MODE 1 above 50% of RATED THERMAL POWER* for ITS 3.2.4, "QPTR," because these CTS Specifications are listed as excepted Specifications in CTS 3/4.10.2 for the corresponding ITS LCOs.

Note that CTS 3.2.1 is listed as an excepted Specification in the CTS 3.10.2 LCO statement but does not appear to exist in CTS.

Volume 8 – Section 3.3 (ADAMS Accession No. ML21265A379)

1. On page 29/499, Discussion of Changes L05 is missing the letter "d" after the word "require" in the last sentence of the first paragraph.
2. On page 53/499, proposed Table 3.3.1-1 page (4 of 8) is missing a reference in footnote "(c)".
3. On page 59/499, variables on either side of the inequality should be on the same line for readability.
4. On page 296/499, DOC A04 states that the ITS Table 3.3.3-1 Containment Pressure (Narrow Range), Containment Water Level (Narrow Range), and Containment High Range Area Radiation Functions require one channel to be OPERABLE. However, proposed Table 3.3.3-1 has the number "2" in the "REQUIRED CHANNELS" column for the "Containment Area Radiation (High Range)" function.
5. On page 303/499, proposed bases page B 3.3.3-4 retains the following sentences from NUREG-1431: "Table 3.3.3-1 in unit specific TS should list all Type A and Category I variables identified by the unit specific Regulatory Guide 1.97 analyses, as amended by the NRC's SER," and "These discussions are intended as examples of what should be provided for each Function when the unit specific list is prepared." While NUREG-1431 does not bracket identify these as reviewers' notes, it may be more appropriate to propose changes to make the text of the bases specific to Turkey Point Nuclear Plant (Turkey Point) Units 3 and 4.
6. On Page 448/499 Enclosure 2 Vol 8 (ITS 3.3) and pages 18/130 and 21/130 Enclosure 2 Volume 7 (ITS 3.2), TS 3.3.3.2 for Movable Incore Detector System is proposed for removal, but ITS 3.2.1 Required Action C.2.2 and SR 3.2.1.2 call out MIDS as an SSC. On Page 29/499 Enclosure 2, Volume 8 (ITS 3.3), Discussion of Changes L05 is missing the letter "d" after the word "require" in the last sentence of the first paragraph.
7. On page 336/499, the ITS 3.3.4 title and LCO have strikethrough errors which will result in "CREV" instead of "CREVS."

8. On page 341/499, ITS Table 3.3.4-1 Function 3 states, "Refer to LCO 3.3.2, "Containment Isolation," for all initiation functions and requirements." The note does not specify which function(s) in LCO 3.3.2 are referenced.
9. On page 426/499, ITS Table 3.3.6-1 Insert 1 refers to "items" inconsistent with the ISTS nomenclature "functions."
10. On page 412/499, CTS Table 4.3-2 indicates four SRs will be in ITS 3.3.6, but ITS 3.3.6 shows only three SR are used (pages 421-424/499.) The Channel Calibration SR is SR 3.3.6.3 in ITS, but SR 3.3.6.4 in CTS. The ITS reference (page 412/499) states the TADOT SR will be SR 3.3.6.3 in ITS, but TADOT is deleted in ITS 3.3.6.
11. On page 335/499, ITS 3.3.4 Required Action A.1 states, "Place CREVS in recirculation mode." It is only part of referenced CTS Table 3.3-2 Action 24A (page 326/499) which states, "With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, within 7 days restore the inoperable channel to OPERABLE status or place the Control Room Emergency Ventilation System in the recirculation mode." There is not a DOC for how this was dispositioned. Provide justification for this change

Volume 10 – Section 3.5 (ADAMS Accession No. ML21265A381)

1. ITS 3.5.2 – page 42 - In the STS markup the licensee indicates that the safety injection (SI) flow paths isolated when T_{avg} is less than or equal to 380 degrees F. Page 30 the CTS markup states less than 380 degrees.
2. ITS 3.5.2 – page 49 - The Surveillance Frequency is missing. Page 34 states that the frequency is "In accordance with the Surveillance Frequency Control Program [SFCP]."
3. ITS - 3.5.2 - pages 49 and 70 - The Frequency for SR 3.5.2.9 is missing. Also, page 70 of 142 for the bases for SR 3.5.2.9, has the SR as "SR 3.5.3.9."
4. ITS - 3.5.2 – page 56 - The bases include an extra space for 3.5.2 after deletion of Ref. 3. There is an extra "s" after "Ref." although the revised only refers to one reference now instead of two.
5. ITS 3.5.2 – page 58 - In the markup of ITS (page 42) the licensee indicates that the safety injection (SI) flow paths isolated when T_{avg} less than or equal to 380°F, but the CTS (page 30) states less than 380°F. Similarly, the ITS BASES LCO discussion on the last paragraph, does not reflect that T_{avg} is maintained less than 380 not less than or equal to 380°F.
6. ITS - 3.5.2 – page 61 - In the bases describing Action H.1 and H.2, the licensee adds language stating, "component or flow path in..." However, ITS 3.5.2 discusses equipment and flow paths. Provide an explanation for which language is going to be retained as it is unclear whether this may have been a typo or if the intent was to add the proposed language based on plant-specific information.
7. ITS - 3.5.2 – page 63 - Under Insert 4A, E.1. Action E.1 states: "...EDG must be restored. The 14 day or in accordance..." It appears the phrase should state: "...EDG must be restored within 14 days or in accordance..." Therefore, it appears there is a typo in E.1 of the BASES.

Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A382)

1. ITS 3.6.1 – page 28 - The ITS 3.6.1 Bases JFD page has a footer that states Sequoyah Unit 1 and Unit 2. Given that this is a Turkey Point application it appears that this is an editorial error.
2. ITS 3.6.2 – page 43 - The ISTS 3.6.2 markup appears to be missing Discussion of Changes (DOC) M01 reference (in the left margin) for Required Action A.1.
3. ITS 3.6.3 – page 63 - The CTS SR 4.6.4.2.c markup associated with ITS 3.6.3 refers to DOC LA01. DOC LA01 refers to “containment purge and exhaust isolation” signal whereas CTS SR 4.6.4.2.c refers to “containment ventilation isolation test signal.” In addition, LA01 refers to ITS SR 3.6.3.8, which does not exist.
4. ITS 3.6.3 – page 69 - The ITS 3.6.3 DOC L01 refers to CTS 3.6.3.1. It appears that CTS 3.6.3.1 does not exist.
5. ITS 3.6.3 – page 70 - The ITS 3.6.3 DOC L02 refers to CTS 4.6.1.1.a.1. It appears that this CTS item does not exist.
6. ITS 3.6.3 – page 78 - The ISTS 3.6.3 markup, in the left margin by Required Action A.2, references DOC L07 (DOC L07 is associated with ITS 3.6.3 Actions Note 1). Address how/whether DOC L07 applies to or is associated with Required Action A.2.
7. ITS 3.6.3 – page 84 - The ITS 3.6.3 markup to SR 3.6.3.1 refers to JFD 5. It appears that this is incorrect because JFD 5 indicates that this SR is not necessary and was deleted. In addition, ITS 3.6.3 markup shows SR 3.6.3.2 as deleted and cites JFD 5. However, JFD 5 description does not state that it applies to deletion of SR 3.6.3.2.
8. ITS 3.6.4 – page 126 - The ITS 3.6.4 JFD 2 appears to erroneously refer to the ITS Bases.
9. ITS 3.6.5 – page 136 - The CTS LCO 3.6.1.5 markup does not show “primary” as a deletion with a corresponding DOC. Properly characterize the change and provide the appropriate justification.
10. ITS 3.6.5 – page 137 - The ITS 3.6.5 DOC LA01 refers to CTS 4.6.1.5.1. It appears that there is no CTS with that numbering.
11. ITS 3.6.6 – page 157- The DOC and JFD for ITS 3.6.6 are currently entitled containment spray system. However, the ITS 3.6.6 DOCs discuss both containment spray and containment cooling units. It appears that the title should reflect both.
12. ITS 3.6.6 – page 158 - DOC A04 refers to CTS 3.6.2.1 Action b on two occasions. It appears the second use is incorrect and should be CTS 3.6.2.2 Action b.
13. ITS 3.6.6 – page 167 - ITS 3.6.6 markup for new Condition D refers to DOC L06 in the margin. It appears there is no DOC L06.
14. ITS 3.6.6 – page 167 - ITS 3.6.6 markup to new Condition E refers to JFD 2. JFD 2 does not appear to apply (not bracketed info).

15. The Bases for ITS 3.6.6 ASA markup refers to emergency containment cooling “train.” Given that ITS LCO 3.6.6 refers to emergency containment cooling “units,” referring to emergency containment cooling train in the Bases for ITS 3.6.6 is inconsistent
16. ITS 3.6.5 - page 136 – The CTS LCO 3.6.1.5 markup does not show “primary” as a deletion with a corresponding DOC. Properly characterize the change and provide the appropriate justification.

Volume 13 – Section 3.8 (ADAMS Accession No. ML21265A384)

1. ITS 3.8.1 – page 17 - On ITS 3.8.1 discussion of change (DOC) page 1 of 17, DOC A02 refers to ITS LCO 3.8.1 b.2. ITS LCO 3.8.1 b.2 does not exist, and it should be ITS LCO 3.8.1.b. Provide a revised DOC A02 or an explanation for why it is appropriate to reference ITS LCO 3.8.1 b.2.
2. ITS 3.8.1 – page 18 - On ITS 3.8.1 discussion of change (DOC) page 2 of 17, DOC A04 states that CTS 3.8.1.1.b.1.b, CTS 3.8.1.1.b.1.c and CTS 4.8.1.1.2.i contain the same footnote associated with the allowance for a temporary Class II fuel storage system. The CTS 3.8.1.1 footnote ** and CTS 4.8.1.1 footnote * discuss a temporary Class III fuel storage system. There is a discrepancy between the CTS footnotes and DOC A04. Provide a revised DOC A04 or an explanation for why the discrepancy is appropriate.
3. ITS 3.8.1 – page 20 - On ITS 3.8.1 discussion of change (DOC) page 4 of 17, DOC M02 for CTS 4.8.1.1.2.a.5 references ITS SR 3.8.1.3 note 3. However, ITS SR 3.8.1.3 does not have notes. Should the reference be ITS SR 3.8.1.2 note 3? Update DOC M02 to reflect ITS 3.8.1.2 or provide the technical basis for why it should be SR 3.8.1.3.
4. ITS 3.8.1 – page 20 - On ITS 3.8.1 page 4 of 17, DOC M03 for CTS 4.8.1.1.2.a.5 references ITS SR 3.8.1.3 note 4. However, ITS SR 3.8.1.3 does not have notes. Should the reference be ITS SR 3.8.1.2 note 4? Update DOC M03 to reflect ITS 3.8.1.2 or provide the technical basis for why it should be SR 3.8.1.3.
5. ITS 3.8.1 – page 21 - On ITS discussion of change (DOC) page 5 of 17, DOC M04 states that ITS SR 3.8.1.8, 3.8.1.9, and 3.8.1.13 are modified by a Note specifying a power factor limitation if the EDG is synchronized with offsite power. M04 states, “The Note is Note 2 for ITS SRs 3.8.1.8, 3.8.1.9, and SR 3.8.1.13.” However, there seems to be a discrepancy as ITS SR 3.8.1.13 Note 2 allows use of warmup procedures, such as idling, gradual acceleration, and gradual loading as recommended by the manufacturer. Note 3 for ITS SR 3.8.1.13 specifies the power factor limitation. Provide a revised DOC M04 or an explanation for why it is appropriate to reference Note 2 for ITS SR 3.8.1.13.
6. ITS 3.8.1 – page 23 - On ITS 3.8.1 discussion of change (DOC) page 7 of 17, DOC LA03 states, “ITS Required Action E.3.2 states to determine OPERABLE EDG(s) is not inoperable due to common cause failure.” However, on ITS page 3.8.1-2 Required Action E.4.1 states, “Determine OPERABLE EDG(s) is not inoperable due to common cause failure.” Update DOC LA03 to reflect Required Action E.4.1 or provide the technical basis for why it should be Required Action E.3.2.
7. ITS 3.8.1 – page 26 - On ITS 3.8.1 discussion of change (DOC) page 10 of 17, DOC L03 states, “ITS 3.8.1 Required Action E.3.2 allows 24 hours to perform a similar check on the remaining OPERABLE EDGs.” On ITS 3.8.1 page 3.8.1-2, it shows Required Actions E.1,

- E.3, E.4.1 and E.4.2 with Required Action E.4.2 requiring within 24 hours the performance of SR 3.8.1.6 (EDG start from standby condition) for operable EDGs. Revise DOC L03 to reflect ITS required action E.4.2 instead of E.3.2 or provide an explanation for why it is appropriate to reference Required Action E.3.2.
8. ITS 3.8.1 – page 31 - On ITS 3.8.1 discussion of change (DOC) page 15 of 17, DOC L09 states that CTS 4.8.1.1.2.g.2) requires verification of EDG performance following a “simulated” loss of offsite power and that the purpose of CTS 4.8.1.1.2.g.2 is to ensure that the AC Sources operate correctly upon receipt of an actuation signal. However, on CTS page 3/4 8-7, CTS 4.8.1.1.2.g.2 requires verifying the generator capability to reject a load of greater than or equal to 392 kW without exceeding a frequency of 66.25 Hz and does not require verification of EDG performance following a “simulated” loss of offsite power. CTS 4.8.1.1.2.g.4 requires verification of EDG performance following a “simulated” loss of offsite power. Revise DOC L09 to reference CTS 4.8.1.1.2.g.4 instead of CTS 4.8.1.1.2.g.2 or provide an explanation for why it is appropriate to reference CTS 4.8.1.1.2.g.2.
 9. ITS 3.8.1 - page 40 – On the bottom of ITS 3.8.1 page 3.8.1-3, there are three justifications for deviation (JFD) (3 (inside the brace), 1 with the brace, and 1 (below the brace)) that seem to align with the bracketed Completion Time, “OR In accordance with the Risk Informed Completion Time Program” for ITS 3.8.1 Required Action G.1. However, JFD 2 which discusses removal of the brackets is not referenced and it’s unclear what deviations go with these three JFDs. Provide an explanation for what deviations are associated with JFD 3 (inside the brace), JFD 1 with the brace, and JFD 1 below the brace.
 10. ITS 3.8.1 - page 74 – On ITS 3.8.1 Bases page B 3.8.1-2, insert 4 is not associated with bracketed information. Provide an explanation for how Bases JFD 2 applies to insert 4.
 11. ITS 3.8.1 – page 78 - On ITS 3.8.1 Bases insert page B 3.8.1-4, insert 8 has two references to limiting conditions for operation (LCOs) 3.5.2 and 3.8.2. On ITS 3.8.1 Insert Page 3.8.1-1, Note 2 references LCOs 3.5.2 and 3.8.4. Explain why LCO 3.8.2 is discussed in relation to Note 2.
 12. ITS 3.8.1 - page 121 – On ITS 3.8.1 Bases page B 3.8.1-29, SR 3.8.1.13 states, “The provisions for pre-lubricating and warmup, discussed in SR 3.8.1.7...” However, ITS 3.8.1 SR 3.8.1.7 does not discuss pre-lubricating and warmup of the EDG. ITS 3.8.1 Bases SR 3.8.1.6 discusses pre-lubricating and warmup of the EDG. Revise the ITS 3.8.1 Bases for SR 3.8.1.13 or provide an explanation why it is appropriate to reference to SR 3.8.1.7 for pre-lubricating and warmup of the EDG.
 13. ITS 3.8.1 - page 145 – On ITS 3.8.2 discussion of change (DOC) page 4 of 5, DOC L04 states, “This changes the CTS by not requiring... CTS .8.1.1.2g.10 (ITS SR 3.8.1.16), CTS 4.8.1.1.2g.a and b) (ITS SR 3.8.1.18)” There seems to be a discrepancy in these CTS SRs such that they should be CTS 4.8.1.1.2g.10, and CTS 4.8.1.1.2g.6a and b. Provide a revision that resolves the discrepancy for CTS 8.1.1.2g.10 and CTS 4.8.1.1.2g.a and b) or provide an explanation for why it is appropriate to reference CTS 8.1.1.2g.10 and CTS 4.8.1.1.2g.a and b).
 14. ITS 3.8.1 - page 176 – On ITS 3.8.3 discussion of changes (DOC) page 4 of 6, LA02 states that CTS 3.8.1.1.b.1)3 requires that the operability of a Unit 3 EDG includes the capability to transfer lubricating oil from storage to the EDG unit. However, CTS 3.8.1.1.b.1)3 does not exist, CTS 3.8.1.1.b.1e appears to be the correct reference. Provide a revised DOC

with the correct reference to the CTS or an explanation for how CTS 3.8.1.1.b.1)3 is the correct reference.

15. ITS 3.8.1 – page 177 - On ITS 3.8.3 discussion of changes (DOC) page 5 of 6, it states that the criteria and frequencies established in the ITS 5.5.11, “Diesel Fuel Oil Testing Program,” and ITS SR 3.8.3.3 will ensure the diesel fuel oil is at a quality that will ensure proper operation of the EDG during a design basis accident. However, on page 5.5-13 it shows that ITS 5.5.10 is the “Diesel Fuel Oil Testing Program.” Provide a revised DOC LA03 with the correct reference or an explanation for why it is appropriate to reference ITS 5.5.11.

Volume 16 - Section 5 (ADAMS Accession No. ML21265A387)

1. ITS 5.3.1 – pages 35 and 36 - both pages contain the same “Insert 1” language for the same specification. It appears the “Insert 1” language was inadvertently included twice.
2. ITS 5.4.1 – page 42 - the licensee indicates in the CTS markup that “6.8.1.e” should be identified as ITS “5.4.1.d” in the STS markup; however consistent with the DOC on page 43 and the STS markup, it appears that “6.8.1.e” should be numbered as “5.4.1.c.”
3. ITS 5.4.1 – page 46 - it appears that the word “in” was deleted, however it appears the language is necessary to support incorporation of the proposed “Quality Assurance Topical Report.”
4. ITS 5.6.2 – page 129 – The “r” in the deleted “year” needs to also be deleted.
5. ITS 5.7.1 - page 146 – DOC L01 identifies ITS 5.8.1.d as providing similar requirements as CTS 6.1.2.1. As the ITS markup does not include a Section 5.8.1, the topic seems more aligned with 5.7.1.d.

SUBJECT: TURKEY POINT NUCLEAR PLANT, UNITS 3 AND 4 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING AMENDMENT REQUEST CONCERNING TECHNICAL SPECIFICATION CONVERSION TO NUREG-1431, REVISION 5 (EPID L-2021-LLI-0002) DATED DECEMBER 21, 2021

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ADAMS Accession No. ML21342A293

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OFFICE	NRR/DORL/LPL2-2/BC	NRR/DORL/LPL2-2/PM	
NAME	DWrona	MMahoney	
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