



Turkey Point Unit 3 and Unit 4

License Amendment Request

Reactor Trip Breaker

Completion Time Extension

August 17, 2022



Agenda

- **LAR Purpose**
- **Expedited Review Basis**
 - 3B RTB proposed maintenance
 - Operability, System Capability
 - Defense in Depth and Diversity
- **LAR Strategies Considered**
 - Risk Informed Process for Evaluations
 - One-Time CT Extension
 - Risk Informed Completion Time
- **Questions and Comments**

Purpose

- **Current Completion Time**

- Tech Spec 3.3.1, Table 3.3-1, Functional Unit (FU) 19, RTBs
 - Total No. of Channels = 2
 - Channels to Trip = 1
 - Minimum channels OPERABLE = 2
- ACTION 8 for MODES 1 thru 4
 - For one channel less than Minimum Channels Operable requirement, be in HOT STANDBY within **6 hours**.
 - One channel may be bypassed up to 2 hours for SR testing provided the other channel is OPERABLE.

- **Completion Time Extension**

- Proposed ACTION 8 for MODES 1 thru 4
 - For one channel less than Minimum Channels Operable requirement, be in HOT STANDBY within **24 hours**.
 - One channel may be bypassed up to 2 hours for SR testing provided the other channel is OPERABLE.

- **Precedent**

- Surry (ML19143A201)
- Virgil C. Summer (ML17206A412)

Expedited Review Request

- **3B RTB Issue**

- One of two switches falsely indicating 3B RTB OPEN
 - False input to Feedwater Isolation logic circuitry
- Proposed Maintenance
 - Replace 3B RTB and temporarily bypass cell switch with Unit 3 online;
 - 3B RTB OOS ~7 hours

- **Maintenance Schedule**

- 3B RTB corrective maintenance scheduled October 24, 2022

- **Operability / Safety Function**

- 3B RTB is currently OPERABLE
- During maintenance, RTB and RPS systems remain fully capable
- Defense in Depth and Diversity
 - Bypass RTBs
 - Undervoltage or Shunt Coil
 - AMSAC

LAR Strategies Considered

- **Options**
 - One-Time Completion Time Extension
 - Risk Informed Process for Evaluations (RIPE)
 - Risk Informed Completion Time Extension (RICT)
- **Considerations**
 - Near term need date
 - Very low PRA Risk (both delta CDF and LERF)

LAR Strategies Considered

- **Risk Informed Process for Evaluations (RIPE)**
 - TSG-DORL-2021-01, Revision 2
 - Approved TSTF-505 and TSTF-425 programs
 - Integrated Decision-Making process per TSG guidelines
 - No immediate actions for safe operation or continued power production
 - 3B RTB is modeled in PRA
 - Meets RG 1.174 minimal risk significance guidelines (CDF and LERF)
- **One-Time Completion Time Extension**
 - Would only result in one-time use
 - Additional NRC reviews
- **Risk Informed Completion Time Extension (RICT)**
 - Would result in greatest flexibility
 - Likely would not be processed in time for planned use
 - Additional NRC reviews



Questions?

