FPL.

AUG 1 1 2011
L-2011-317
10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555-0001

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Errata to Technical Specification Changes for Amendments 244 and 240,
Alternative Source Term

References:

(1) W. Jefferson (FPL) to U.S. Nuclear Regulatory Commission (L-2009-133), "License Amendment Request 196: Alternative Source Term and Conforming Amendment," Accession No. ML092050277, June 25, 2009.

(2) D. Robinson (FPL) to J. Paige (NRC), "Clean Copy of AST OL & TS Changes," June 22, 2011.

(3) J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – Issuance of Amendments Regarding Alternative Source Term (TAC NOS. ME1624 and ME1625)," Accession No. ML110800666, June 23, 2011.

(4) S. Hale (FPL) to J. Paige (NRC), "AST TS Typos," August 2, 2011.

By letter L-2009-133 dated June 25, 2009 [Reference 1], the Florida Power and Light Company (FPL) requested to amend Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Nuclear Plant (PTN) Units 3 and 4 Technical Specifications (TS). The proposed amendments were to revise the TS to adopt the alternative source term (AST) as allowed in 10 CFR 50.67.

By email dated June 22, 2011 [Reference 2], FPL provided clean copies of the proposed AST TS Changes to the U. S. Nuclear Regulatory Commission (NRC) Project Manager (PM) to support the issuance of the requested amendments.

On June 23, 2011, the NRC approved LAR No. 196, Alternative Source Term (AST) and Conforming Amendment, and issued Amendments 244 and 240 [Reference 3].

Subsequent to the issuance of the amendments, FPL identified several minor typos in the issued AST amendments [Reference 4] affecting Definition of DOSE EQUIVALENT I-131 in TS 1.0, Table 4.4-4 Rev Bars, Actions a, b, and c in TS 3.4.8 Specific Activity, Surveillance Requirement 4.6.2.3.a, TS 3.7.9 LCO, TS 6.8.4.h, and TS 6.9.1.2. In the Definitions Section, "DOSE EQUIVALENT I-131" was typed as "DOSE Equivalent 1-131" in one instance. In Table 4.4-4, Revision bars needed correction. In Actions a, b, and c, 'I-131' was typed as '1-131' in six instances. In SR 4.6.2.3.a, the colon was missing. In TS 6.8.4.h, a revision bar needed to be added. In TS 6.9.1.2, "microcuries" was typed "microcurie". .The corrected text is consistent with the original TS markups for LAR 196 and is provided in the attachment to this letter.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee of Florida.

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NRR

This submittal does not alter the significant hazards consideration or the environmental assessment previously submitted by FPL letter L-2009-133 [Reference 1].

This submittal contains no new commitments and no revisions to existing commitments.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 11, 2011.

Very truly yours,

Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Attachment

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Resident Inspector, Turkey Point Nuclear Plant
Mr. W. A. Passetti, Florida Department of Health

Turkey Point Units 3 and 4

Errata to Technical Specification Changes
for Amendments 244 and 240,
Alternative Source Term

ATTACHMENT

This coversheet plus 7 pages

FREQUENCY NOTATION

DOSE EQUIVALENT I-131

1.12 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. The determination of DOSE EQUIVALENT I-131 shall be performed using thyroid dose conversion factors from Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."

DOSE EQUIVALENT XE - 133

1.13 DOSE EQUIVALENT XE-133 shall be that concentration of Xe-133 (microcuries per gram) that alone would produce the same acute dose to the whole body as the combined activities of noble gas nuclides Kr-85m, Kr-85, Kr-87, Kr-88, Xe-131m, Xe-133m, Xe-133, Xe-135m, Xe-135, and Xe-138 actually present. If a specific noble gas nuclide is not detected, it should be assumed to be present at the minimum detectable activity. The determination of DOSE EQUIVALENT XE-133 shall be performed using effective dose conversion factors for air submersion listed in Table III.1 of EPA Federal Guidance Report No. 12, 1993, "External Exposure to Radionuclides in Air, Water, and Soil."

1.14 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

GAS DECAY TANK SYSTEM

1.15 A GAS DECAY TANK SYSTEM shall be any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System off gases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

IDENTIFIED LEAKAGE

1.16 IDENTIFIED LEAKAGE shall be:

a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or

b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of Leakage Detection Systems or not to be PRESSURE BOUNDARY LEAKAGE, or

c. Reactor Coolant System leakage through a steam generator to the Secondary Coolant System (primary-to-secondary leakage).

TABLE 4.4-4

REACTOR COOLANT SPECIFIC ACTIVITY SAMPLE AND ANALYSIS PROGRAM

TYPE OF MEASUREMENT AND ANALYSIS	SAMPLE AND ANALYSIS FREQUENCY	MODES IN WHICH SAMPLE AND ANALYSIS REQUIRED
1. NOT USED		
2. Tritium Activity Determination	1 per 7 days.	1, 2, 3, 4
3. Isotopic Analysis for DOSE EQUIVALENT I-131	a) 1 per 14 days. b) One sample between 2 and 6 hours following a THERMAL POWER change exceeding 15% of the RATED THERMAL POWER within a 1 hour period.	1, 2, 3, 4
4. Radiochemical Isotopic Determination Including Gaseous Activity	Monthly	1, 2, 3, 4
5. Isotopic Analysis for DOSE EQUIVALENT XE-133	1 per 7 days	1, 2, 3, 4
6. NOT USED		

3/4.4.8 SPECIFIC ACTIVITY

LIMITING CONDITION FOR OPERATION

3.4.8 The specific activity of the primary coolant shall be limited to:

a. Less than or equal to 0.25 microcuries per gram DOSE EQUIVALENT I-131, and

b. Less than or equal to 447.7 microcuries per gram DOSE EQUIVALENT XE-133.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With the specific activity of the reactor coolant greater than 0.25 microcuries per gram DOSE EQUIVALENT I-131, verify DOSE EQUIVALENT I-131 is less than or equal to 60 microcuries per gram once per 4 hours.

b. With the specific activity of the reactor coolant greater than 0.25 microcuries per gram DOSE EQUIVALENT I-131, but less than or equal to 60 microcuries per gram, operation may continue for up to 48 hours while efforts are made to restore DOSE EQUIVALENT I-131 to within the 0.25 microcuries per gram limit. Specification 3.0.4 is not applicable.

c. With the specific activity of the reactor coolant greater than 0.25 microcuries per gram DOSE EQUIVALENT I-131 for greater than or equal to 48 hours during one continuous time interval, or greater than 60 microcuries per gram DOSE EQUIVALENT I-131, be in HOT STANDBY within 6 hours and COLD SHUTDOWN within the next 30 hours.

d. With the specific activity of the reactor coolant greater than 447.7 microcuries per gram DOSE EQUIVALENT XE-133, operation may continue for up to 48 hours while efforts are made to restore DOSE EQUIVALENT XE-133 to within the 447.7 microcuries per gram limit. Specification 3.0.4 is not applicable.

e. With the specific activity of the reactor coolant greater than 447.7 microcuries per gram DOSE EQUIVALENT XE-133 for greater than or equal to 48 hours during one continuous time interval, be in HOT STANDBY within 6 hours and COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.8 The specific activity of the reactor coolant shall be determined to be within the limits by performance of the sampling and analysis program of Table 4.4-4.

3/4.6.2.3 RECIRCULATION pH CONTROL SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.3 The Recirculation pH Control System shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the Recirculation pH Control System inoperable, restore the buffering agent to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the next 72 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.3 The Recirculation pH Control System shall be demonstrated OPERABLE:

a. At least once per 18 months by:

1. Verifying that the buffering agent baskets are in place and intact;

2. Collectively contain $\geq$ 11061 pounds (227 cubic feet) of sodium tetraborate decahydrate, or equivalent.

PLANT SYSTEMS

GAS DECAY TANKS

LIMITING CONDITION FOR OPERATION

3.7.9 The quantity of radioactivity contained in each gas decay tank shall be limited to less than or equal to 70,000 Curies of noble gases (DOSE EQUIVALENT XE-133).

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any gas decay tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank contents to within the limit, and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.4.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9 The quantity of radioactive material contained in each gas decay tank shall be determined to be within the above limit at least once per 24 hours when radioactive materials are being added to the tank and the Reactor Coolant System total activity exceeds the limit of Specification 3.4.8.

PROCEDURES AND PROGRAMS (Continued)

9. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

10. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

g. Deleted

h. Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, and as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995, as modified by the following deviations or exemptions:

1) Type A tests will be performed either in accordance with Bechtel Topical Report BN-TOP-1, Revision 1, dated November 1, 1972, or the guidelines of Regulatory Guide 1.163.

2) Type A testing frequency in accordance with NEI 94-01, Revision 0, Section 9.2.3, except:

   a) For Unit 3, the first Type A test performed after the November 1992 Type A test shall be performed no later than November 2007.

   b) For Unit 4, the first Type A test performed after October 1991 shall be performed no later than October 2006.

3) A vacuum test will be performed in lieu of a pressure test for airlock door seals at the required intervals (Amendment Nos. 73 and 77, issued by NRC November 11, 1981).

The peak calculated containment interval pressure for the design basis loss of coolant accident, P_a, is 49.9 psig.

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.20% of containment air weight per day.

Leakage Rate acceptance criteria are:

1) The As-found containment leakage rate acceptance criterion is $\leq$ 1.0 L_a. Prior to increasing primary coolant temperature above 200°F following testing in accordance with this program or restoration from exceeding 1.0 L_a, the As-left leakage rate acceptance criterion is $\leq$0.75 L_a, for Type A test.

2) The combined leakage rate for all penetrations subject to Type B or Type C testing is as follows:

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, DC pursuant to 10 CFR 50.4.

STARTUP REPORT

6.9.1 .1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

The report shall address each of the tests identified in the FSAR and shall in general include a description of the measured values of the operating conditions of characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report. Subsequent Startup Reports shall address startup tests that are necessary to demonstrate the acceptability of changes and/or modifications.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS*

6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year.

Reports required on an annual basis shall include:

The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Fuel burnup by core region; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) History of degassing operations, if any, starting 48 hours prior to the first sample in which the limit was exceeded; and (5) The time duration when the specific activity of the primary coolant exceeded 0.25 microcuries per gram DOSE EQUIVALENT I-131.

* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.