



L-2013-042
10 CFR 50.90
FEB 14 2013

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
Response to NRC Request for Additional Information Regarding
License Amendment Request No. 217 – Administrative Changes to
Operating License Conditions and Technical Specifications

References:

- (1) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-130), "Administrative License Amendment Request No. 217 Regarding Operating License Conditions and Technical Specifications," Accession No. ML12262A290, September 14, 2012.
- (2) M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2013-019), "Supplement to Administrative License Amendment Request No. 217 Regarding Operating License Conditions and Technical Specifications," January 29, 2013.
- (3) Email from Tracy Orf (NRC) to Olga Hanek (FPL), "Draft RAI on LAR 217, License Conditions and Technical Specifications," January 24, 2013.

By letter L-2012-130 dated September 14, 2012 [Reference 1], Florida Power & Light Company (FPL) requested to amend Renewed Facility Operating Licenses DPR-31 and DPR-41 and revise the Turkey Point Units 3 and 4 Technical Specifications (TS). The proposed amendments will (1) close and remove license conditions that have been fully satisfied, (2) revise TS 5.5.1 to remove related license conditions, (3) correct several inadvertent errors identified in the TS, and (4) update the reference to the Physical Security Plan (PSP) to the latest approved revision in the related license conditions. The license conditions that had been fully satisfied included 3.H on AST Modifications, 3.I on Control Room Habitability, and 3.J on EPU Modifications for DPR-31 and license conditions 3.H on the Boraflex Remedy, 3.I.1 & 3.I.3 on AST Modifications, 3.J on Control Room Habitability, and 3.K on EPU Modifications for DPR-41.

By letter L-2013-019 dated January 29, 2013 [Reference 2], FPL submitted a supplement to License Amendment Request (LAR) No. 217 to (1) add 3.I.2 on AST Modifications for DPR-41 to the list of requested license conditions to be deleted, (2) add Control Room Envelope (CRE) to the Limiting Condition for Operation (LCO) listed system components, and (3) update the TS Index, delete TS pages that were no longer applicable and repaginate affected section pages.

By email from the U.S. Nuclear Regulatory Commission (NRC) Project Manager (PM) dated January 24, 2013 [Reference 3], additional information regarding the results of the completed tracer gas testing and pressurization testing was requested by the staff in NRC's Containment and Ventilation Branch (SCVB) to support its review of Administrative LAR No. 217. The RAI consisted of one question regarding the results of the completed tracer gas and pressurization testing and the associated test configuration. The RAI question and applicable FPL response are provided in the Attachment to this letter.

ADD
NRR

This submittal does not alter the significant hazards consideration or environmental assessment previously submitted by FPL letter L-2012-130 [Reference 1].

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

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

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 February 14, 2013.

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 Senior Resident Inspector, Turkey Point Nuclear Plant
Ms. Cindy Becker, Florida Department of Health

Turkey Point Units 3 and 4

**Response to NRC Request for Additional Information Regarding
License Amendment Request No. 217 - Administrative Changes to
Operating License Conditions and Technical Specifications**

ATTACHMENT

Response to Request for Additional Information

The following information is provided by Florida Power & Light Company (FPL) in response to the U. S. Nuclear Regulatory Commission's (NRC) Request for Additional Information (RAI). This information was requested to support License Amendment Request (LAR) No. 217 on Administrative Changes to Operating License Conditions and Technical Specifications, for Turkey Point Nuclear Plant (PTN) Units 3 and 4 that was submitted to the NRC by FPL letter L-2012-130 on September 14, 2012 [Reference 1] and supplemented by FPL letter L-2013-019 on January 29, 2013 [Reference 2].

In an email dated January 24, 2013 [Reference 3], the NRC staff requested additional information regarding FPL's request to implement proposed administrative changes to PTN's Operating Licenses and Technical Specification (TS) under LAR No. 217. The RAI consisted of one question from the NRC's Containment and Ventilation Branch (SCVB) regarding the results of the completed tracer gas and pressurization testing of the Control Room Envelope (CRE) and associated test configuration. The RAI question and FPL's response are documented below.

SCVB-1 In the September 14, 2012 submittal, the licensee states that condition 3.I.(a) and (c) were satisfied with completion of the tracer gas testing and pressurization testing on July 25, 2012—no results are provided from the test. Please provide the test results and discuss how the Control Room test configuration is consistent with the AST assumptions.

On September 14, 2012, FPL requested via letter L-2012-130 [Reference 1] deletion of license conditions 3.I for DPR-31 and 3.J for DPR-41 regarding (a) CRE unfiltered leakage test (i.e., tracer gas test), (b) CRE habitability assessment, and (c) CRE differential pressure test. It was noted that license conditions 3.I.(a) & 3.I.(c) were satisfied with completion of the tracer gas testing and pressurization testing of the CRE using the normal control room emergency ventilation system (CREVS) filter train on July 18, 2012 and using the compensatory filtration unit on July 25, 2012 while license condition 3.I.(b) was satisfied with completion of the required CRE habitability assessment on September 13, 2012. These specific license conditions were established with the issuance of Amendments 248 and 244 for TSTF-448 on Control Room Habitability dated March 30, 2012 [Reference 4].

On July 18, 2012, the measured unfiltered CRE leakage was approximately 37 ± 5 scfm plus 10 scfm for CR ingress/egress using the normal CREVS filter train. On July 25, 2012, the measured unfiltered CRE leakage was approximately 44 ± 6 scfm plus 10 scfm for CR ingress/egress using the compensatory filtration train. The acceptance criterion for unfiltered CRE leakage is ≤ 90 scfm plus 10 scfm for CR ingress/egress based on Alternative Source Term (AST) and associated radiological dose consequence analyses which were approved by the NRC under Amendments 244 and 240 on June 23, 2011 [Reference 5]. Therefore, the measured unfiltered CRE leakage was found acceptable.

On July 18, 2012, the CRE differential pressure for the normal filter train, using the "A" supply fan, was measured at 0.26 inch H₂O with regard to the battery room, 0.04 inch H₂O with regard to the cable spreading room, and 0.04 inch H₂O with regard to the outside environs. For the normal filter train using the "B" supply fan, the CRE differential pressure was measured at 0.28 inch H₂O with regard to the battery room, 0.04 inch H₂O with regard to the cable spreading room, and 0.04 inch H₂O with regard to the outside environs.

On July 25, 2012, the CRE differential pressure for the compensatory filter train was measured at 0.40 inch H₂O with regard to the battery room, 0.04 inch H₂O with regard to the cable spreading room, and 0.07 inch H₂O with regard to the outside environs. Therefore, as all of the CRE differential pressure measurements were positive, the test results were found acceptable.

This testing followed two major plant modifications involving CREVS: one to relocate the CREVS emergency air intakes away from the Auxiliary Building and another to install a compensatory filtration unit to serve as a qualified backup to the normal filter train. Both of these modifications required temporary breaching of the CRE to implement the required design changes. In addition, the AST changes to CREVS TS 3/4.7.5 explicitly identified CREVS components required to be operable and corresponding surveillance requirements.

The LCO lists the two isolation dampers in the kitchen area exhaust duct and two isolation dampers in the toilet area exhaust duct with associated action statements and surveillance requirements. However, subsequent inspections revealed that these gravity backdraft dampers would require substantial corrective maintenance to be considered operable. Therefore, the motor-operated dampers in the exhaust ducts were closed and the ducts were blanked off at the CRE boundary pending further design review by Engineering. In the interim, portable air filtration units have been installed in the control room kitchen and toilet areas. With an isolation damper inoperable in the kitchen area and toilet area exhaust dampers, TS 3/4.7.5 requires entry into Actions a.8 and a.9 that permit indefinite operation with the associated flow path isolated. This condition was documented in LAR No. 223 via FPL letter L-2012-313 on August 7, 2012 [Reference 6] where an additional footnote was proposed for Modes 5 and 6. The LAR was approved with the NRC's issuance of Amendments 253 and 249 on November 5, 2012 [Reference 7].

As a result of these actions, the CRE was tested with the exhaust ducts blanked off (See Figure 1 - CR Plan - Elev. 42 ft) and one of the two in-series normal air intake dampers (D-1A) failed open (See Figure 2 - CR Plan - Elev. 30 ft) as the worst single failure for the unfiltered inleakage and pressurization testing of both normal and compensatory filter trains. The measured unfiltered CRE inleakage and differential pressure results are as stated above for both the normal and compensatory filter trains. Figures 1 and 2 showing Control Room Boundary (CRB) plan views and applicable isolation dampers are attached.

References

1. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-130), "Administrative License Amendment Request No. 217 Regarding Operating License Conditions and Technical Specifications," Accession No. ML12262A290, September 14, 2012.
2. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2013-019), "Supplement to Administrative License Amendment Request No. 217 Regarding Operating License Conditions and Technical Specifications," January 29, 2013.
3. Email from Tracy Orf (NRC) to Olga Hanek (FPL), "Draft RAI on LAR 217, License Conditions and Technical Specifications," January 24, 2013.
4. J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – "Issuance of Amendments Regarding Control Room Habitability Technical Specification Task Force (TSTF)-448 (TAC Nos. ME4277 and ME4278)," Accession No. ML12067A176, March 30, 2012.
5. 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.
6. M. Kiley (FPL) to U.S. Nuclear Regulatory Commission (L-2012-313), "Administrative License Amendment Request No. 223 Regarding Control Room Emergency Ventilation System Technical Specification," Accession No. ML12221A392, August 7, 2012.
7. J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Generating Station Unit Nos. 3 and 4 – Issuance of Amendments Regarding Revision to Technical Specifications 3.7.5, "Control Room Emergency Ventilation System" (TAC Nos. ME9211 and ME9212), Accession No. ML12291A730, November 5, 2012.

FIGURE 1



