



L-2016-213  
10 CFR 50.90  
November 15, 2016

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

RE: Turkey Point Nuclear Plant, Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Renewed Facility Operating Licenses DPR-31 and DPR-41

Response to Request for Additional Information Regarding License Amendment  
Request 245, Change to the Technical Specifications to Address an Inoperable  
Steam Supply for the Auxiliary Feedwater Pumps

References:

1. Florida Power & Light Company letter L-2016-128, "Change to the Technical Specifications to Address an Inoperable Steam Supply for the Auxiliary Feedwater Pumps," June 30, 2016 (ML 16194A342)
2. NRC E-mail from J. Lamb to M. Guth, "Turkey Point Nuclear Plant, Units 3 and 4 - Request for Additional Information for License Amendment Request to Revise the Auxiliary Feedwater System Technical Specifications (CAC NOS. MF8068 AND MF8069)," October 27, 2016 (ML16228A004)

In Reference 1, Florida Power & Light Company (FPL) submitted license amendment request (LAR) 245 for Turkey Point Units 3 and 4 to correct a non-conservative Technical Specification (TS) by revising TS 3.7.1.2, Auxiliary Feedwater (AFW) System, to require the operability of three AFW system steam supplies and to provide remedial measures for an inoperable steam supply.

In Reference 2, the NRC determined that additional information is needed to complete its review. The enclosure to this letter provides FPL's response to the request for additional information.

This response does not alter the conclusion in Reference 1 that the proposed changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and that there are no significant environmental impacts associated with the proposed changes.

This letter contains no new or revised regulatory commitments.

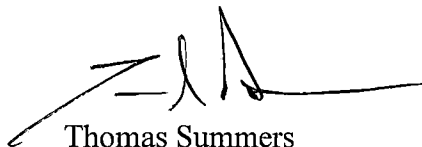
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NRC

Should you have any questions regarding this submission, please contact Mr. Mitch Guth, Turkey Point Licensing Manager, at 305-246-6698.

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

Executed on the 15 day of November 2016.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Summers', with a long horizontal line extending to the right.

Thomas Summers  
Site Vice President  
Turkey Point Nuclear Plant

Enclosure: Response to Request for Additional Information

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

**Enclosure**

Response to Request for Additional Information (RAI) for  
License Amendment Request to  
Revise the Auxiliary Feedwater System Technical Specifications  
(CAC NOS. MF8068 AND MF8069)

## REQUEST FOR ADDITIONAL INFORMATION

Table 3.7-3 describes the allowable plant configurations which satisfy the current Limiting Condition for Operation (LCO) 3.7.1.2 requirement of three operable auxiliary feedwater (AFW) pumps and associated flow paths. Table 3.7-3 is supplemented by 3 notes. Note 3 states:

If any local manual realignment of valves is required when operating the auxiliary feedwater pumps, a dedicated individual, who is in communication with the control room, shall be stationed at the auxiliary feedwater pump area. Upon instructions from the control room, this operator would realign the valves in the AFW system train to its normal operational alignment.

Notes 1 and 2 for the table are proposed to be rewritten to apply to the LCO statement, while Note 3 is proposed for deletion.

*Federal Register* Notice 58 FR 39132 contains the NRC's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors. In reference to the four criteria listed in Title 10 of the Code of Federal Regulations, Part 50 (10 CFR), Section 36(c)2(ii), the Policy Statement states: "LCOs which do not meet any of the criteria below may be proposed for removal from the Technical Specifications and relocation to licensee-controlled documents, such as the [Final Safety Analysis Report] FSAR." The Policy statement further states:

If a licensee elects to apply these criteria, the requirements of the removed specifications will be relocated to the FSAR or other licensee-controlled documents. Licensees are to operate their facilities in conformance with the descriptions of their facilities and procedures in their FSAR. Changes to the facility or to procedures described in the FSAR are to be made in accordance with 10 CFR 50.59.

Please provide a description of:

- (1) Where the technical and administrative requirements proposed for removal from the TS, in this case the requirements for manual realignment of the AFW system, will be located or are currently located.
- (2) The control process(es) that will be used for relocated technical and administrative requirements.

## FPL RESPONSE

Note 3 of LCO 3.7.1.2 requires a dedicated individual to be stationed at the AFW pump area in communication with the Control Room if local manual realignment of valves is required when operating the AFW pumps. The purpose of Note 3 is to ensure prompt system re-alignment upon direction from the Control Room when, during periodic testing, only one AFW train is available for operation.

In Reference 1, FPL stated that Note 3 of LCO 3.7.1.2 is being removed because this configuration control mechanism is more aptly suited for plant procedures. More specifically, the requirements of Note 3 are implemented in the AFW surveillance procedures where local manual valve realignment is required when operating the AFW pumps. Proposed changes to these procedures are subject to the requirements of 10 CFR 50.59.

During an October 27, 2016 teleconference regarding the subject RAI, the NRC staff indicated that examples of applicable AFW procedures would be beneficial to its review. As examples, AFW procedures 3(4)-OSP-075.6, Auxiliary Feedwater Train 1 Backup Nitrogen Test, 3(4)-OSP-075.7, Auxiliary Feedwater Train 2 Backup Nitrogen Test and 3(4)-OSP-075.9, AFW Overspeed Test, involve local component manipulations when operating the AFW pumps, where 3(4) denotes the Unit 3 and the Unit 4 AFW procedure. These procedures contain the following instruction in the "Precautions" section:

*"An operator shall remain in the AFW pump area and maintain communication with the Control Room until all AFW pumps are reset for normal operation."*

The procedures are CONTINUOUS USE, meaning that, amongst other requirements, place-keeping each Precautions step using the "circle/slash" method is required prior to commencing work. Place-keeping ensures acknowledgement of the precautionary instruction and the expectation to abide by the prescribed level of use during the task. As such, FPL believes the above instruction is sufficient to ensure prompt realignment of the AFW system upon Control Room direction and thereby, Note 3 of LCO 3.7.1.2 can be removed.