



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

February 9, 2017

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
NextEra Energy
Mail Stop NT3/JW
15430 Endeavor Drive
Jupiter, FL 33478

**SUBJECT: TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 - ISSUANCE
OF AMENDMENTS REGARDING TECHNICAL SPECIFICATIONS FOR
SNUBBERS (CAC NOS. MF7557 AND MF7558)**

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has issued the enclosed Amendment No. 272 to Renewed Facility Operating License (RFOL) No. DPR-31 and Amendment No. 267 to RFOL No. DPR-41 for Turkey Point Nuclear Generating Unit Nos. 3 and 4, respectively. The amendments change the Technical Specifications (TSs) in response to the application from Florida Power & Light Company (the licensee) dated April 4, 2016 (L-2016-055), as supplemented by letters L-2016-172, L-2016-204, and L-2016-221 dated September 1, November 10, and December 2, 2016, respectively.

The amendments revise the TSs for snubbers and add a new TS to the Administrative Controls section of the TSs describing the licensee's Snubber Testing Program. The amendments revise the snubber TS surveillance requirement (SR) by deleting specific requirements from the SR and replacing them with a requirement to demonstrate snubber operability in accordance with the licensee-controlled Snubber Testing Program. The amendments delete a portion of the SR that requires inspections per another TS that is no longer applicable to snubbers. The amendments include additions to, deletions from, and conforming administrative changes to the TSs.

The NRC staff's safety evaluation of the amendments is enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,



Audrey L. Klett, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-250 and 50-251

Enclosures:

1. Amendment No. 272 to DPR-31
2. Amendment No. 267 to DPR-41
3. Safety Evaluation

cc w/enclosures: Distribution via Listserv



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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-250

TURKEY POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 272
Renewed License No. DPR-31

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (the licensee) dated April 4, 2016, as supplemented by letters dated September 1, November 10, and December 2, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.


2. Accordingly, the license is amended by changes to the Renewed Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Renewed Facility Operating License No. DPR-31 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 272 are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Benjamin G. Beasley, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: February 9, 2017



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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-251

TURKEY POINT NUCLEAR GENERATING UNIT NO. 4

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 267
Renewed License No. DPR-41

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (the licensee) dated April 4, 2016, as supplemented by letters dated September 1, November 10, and December 2, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

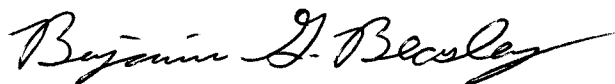
2. Accordingly, the license is amended by changes to the Renewed Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B. of Renewed Facility Operating License No. DPR-41 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 267 are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Benjamin G. Beasley, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: February 9, 2017

ATTACHMENT TO LICENSE AMENDMENTS

AMENDMENT NO. 272 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. 267 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-41

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4

DOCKET NOS. 50-250 AND 50-251

Replace page 3 of Renewed Facility Operating License No. DPR-31 with the attached page 3. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Replace page 3 of Renewed Facility Operating License No. DPR-41 with the attached page 3. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
x [index]	x [index]
3/4 7-22	3/4 7-22
3/4 7-23	3/4 7-23
3/4 7-24	3/4 7-24
3/4 7-25	3/4 7-25
3/4 7-26	3/4 7-26
3/4 7-27	-----
3/4 7-28	-----
3/4 7-29	-----
3/4 7-30	-----
3/4 7-31	-----
6-14	6-14

- E. Pursuant to the Act and 10 CFR Parts 40 and 70 to receive, possess, and use at any time 100 milligrams each of any source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactively contaminated apparatus;
 - F. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of Turkey Point Units Nos. 3 and 4.
3. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified below:
- A. Maximum Power Level

The applicant is authorized to operate the facility at reactor core power levels not in excess of 2644 megawatts (thermal).
 - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 272 are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - C. Final Safety Analysis Report

The licensee's Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21(d), as revised on November 1, 2001, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than July 19, 2012.

The Final Safety Analysis Report supplement as revised on November 1, 2001, described above, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4), following the issuance of this renewed license. Until that update is complete, the licensee may make changes to the programs described in such supplement without prior Commission approval, provided that the licensee evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

- E. Pursuant to the Act and 10 CFR Parts 40 and 70 to receive, possess, and use at any time 100 milligrams each of any source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactively contaminated apparatus;
 - F. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of Turkey Point Units Nos. 3 and 4.
3. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations: 10 CFR Part 20, Section 30.34 of 10 CFR Part 30, Section 40.41 of 10 CFR Part 40, Sections 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect, and is subject to the additional conditions specified below:
- A. Maximum Power Level

The applicant is authorized to operate the facility at reactor core power levels not in excess of 2644 megawatts (thermal).
 - B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 267 are hereby incorporated into this renewed license. The Environmental Protection Plan contained in Appendix B is hereby incorporated into this renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - C. Final Safety Analysis Report

The licensee's Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21(d), as revised on November 1, 2001, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than April 10, 2013.

The Final Safety Analysis Report supplement as revised on November 1, 2001, described above, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4), following the issuance of this renewed license. Until that update is complete, the licensee may make changes to the programs described in such supplement without prior Commission approval, provided that the licensee evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

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PLANT SYSTEMS

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and determine the impact on the attached component by evaluation in accordance with Specification 4.7.6, or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program in Specification 6.8.4.m.

PLANT SYSTEMS

3/4.7.7 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.7 Each sealed source containing radioactive material either in excess of 100 microCuries of beta and/or gamma emitting material or 5 microCuries of alpha emitting material shall be free of greater than or equal to 0.005 microCurie of removable contamination.

APPLICABILITY: At all times.

ACTION:

- a. With a sealed source having removable contamination in excess of the above limits, immediately withdraw the sealed source from use and either:
 - 1. Decontaminate and repair the sealed source, or
 - 2. Dispose of the sealed source in accordance with Commission Regulations.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.7.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microCurie per test sample.

4.7.7.2 Test Frequencies - Each category of sealed sources (excluding startup sources and fission detectors previously subjected to core flux) shall be tested at the frequency described below.

- a. Sources in use - in accordance with the Surveillance Frequency Control Program for all sealed sources containing radioactive materials:
 - 1) With a half-life greater than 30 days (excluding Hydrogen 3), and
 - 2) In any form other than gas.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous 6 months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use; and
- c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source.

4.7.7.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microCurie of removable contamination.

4.7.7.4 A complete inventory of licensed radioactive materials in possession shall be maintained current at all times.

PLANT SYSTEMS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.7.8 The concentration of oxygen in the GAS DECAY TANK SYSTEM (as measured in the inservice gas decay tank) shall be limited to less than or equal to 2% by volume whenever the hydrogen concentration exceeds 4% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of oxygen in the inservice gas decay tank greater than 2% by volume but less than or equal to 4% by volume, reduce the oxygen concentration to the above limits within 48 hours.
- b. With the concentration of oxygen in the inservice gas decay tank greater than 4% by volume and the hydrogen concentration greater than 4% by volume, immediately suspend all additions of waste gases to the gas decay tanks and reduce the concentration of oxygen to less than or equal to 4% by volume, then take ACTION a., above.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.8 The concentrations of hydrogen and oxygen in the inservice gas decay tanks shall be determined to be within the above limits by continuously* monitoring the waste gases in the inservice gas decay tank with the hydrogen and oxygen monitors required OPERABLE by Table 3.3-8 of Specification 3.3.3.6.

*When continuous monitoring capability is inoperable, Table 3.3-8 allows the use of grab samples.

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.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

I. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operations are met:

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.

m. Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

- a. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- b. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(a) subject to the use and conditions on the use of standards listed in 10 CFR 50.55a(b) and subject to Commission approval.
- c. The program shall, as required by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants."
- d. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.

6.8.5 DELETED



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
AMENDMENT NO. 272 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-31
AMENDMENT NO. 267 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-41
FLORIDA POWER & LIGHT COMPANY
TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4
DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By application dated April 4, 2016 (L-2016-055),¹ as supplemented by letters L-2016-172, L-2016-204, and L-2016-221 dated September 1, November 10, and December 2, 2016,² respectively, Florida Power & Light Company (the licensee) requested changes to the Technical Specifications (TSs) for Turkey Point Nuclear Generating Unit Nos. 3 and 4 (Turkey Point 3 and 4), which are contained in Appendix A of Renewed Facility Operating License Nos. DPR-31 and DPR-41. The licensee proposed to revise the TSs for snubbers and to incorporate conforming administrative changes.

By electronic mail (e-mail) dated August 11, and October 18, 2016,³ the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff sent the licensee requests for additional information (RAIs). The licensee responded to the RAIs by letters dated September 1, and November 10, 2016. The licensee's letter dated September 1, 2016, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the original proposed no significant hazards consideration (NSHC) determination that was published in the *Federal Register* (FR) on July 5, 2016 (81 FR 43652). The licensee's letter dated November 10, 2016, expanded the scope of its request as originally noticed; therefore, the NRC published another notice in the FR on December 6, 2016 (81 FR 87971), which replaced the original notice in its entirety. The licensee's letter dated December 2, 2016, did not expand the scope of the application nor change the NSHC determination that was published in the FR on December 6, 2016.

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML16110A266.

² ADAMS Accession Nos. ML16260A399, ML16323A313, and ML16347A658, respectively.

³ ADAMS Accession Nos. ML16228A004 and ML16292A716, respectively.

2.0 REGULATORY EVALUATION

2.1. Description of Turkey Point Snubber Testing Requirements

Many piping systems in a nuclear power plant must remain intact under seismic events or accident conditions to ensure plant and equipment reliability. These systems make extensive use of snubbers. A snubber, or dynamic restraint, is a device designed to protect components from excess shock or sway caused by seismic disturbances or other transient forces. Snubbers allow gradual movement, such as thermal growth, but resist sudden pipe movement from events such as earthquakes, fault loading (e.g., pipe whip), vibration, or shock. There are two types of snubbers – hydraulic and mechanical. During normal operating conditions, the snubber allows for movement in tension and compression. When an impulse event occurs, the snubber becomes activated and acts as a restraint device. The device becomes rigid, absorbs the dynamic energy, and transfers it to the supporting structure. Snubber failures could occur for various reasons. For example, contaminated hydraulic fluid changes clearances and bleed rates; failed seals and “O” rings destroy the hydraulic action; cracked reservoirs and loose fittings cause hydraulic fluid loss; and freezing or overheating can damage the internals. A mechanical snubber may suffer severe internal damage, remain in a locked position, and damage the piping system.

Limiting Condition for Operation (LCO) 3.7.6 in TS 3/4.7.6, “Snubbers,” requires all snubbers to be operable, except those installed on non-safety related systems if their failure, or failure of the system on which they are installed, would have no adverse effect on any safety-related system. The TS Bases⁴ for TS 3/4.7.6 state that all snubbers are required to be operable to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. If one or more snubbers is inoperable, then TS 3/4.7.6 requires the licensee, within 72 hours, to replace or restore the inoperable snubber to operable status and perform an engineering evaluation per surveillance requirement (SR) 4.7.6.f on the attached component or declare the attached system inoperable and follow the appropriate TS action statement for that system.

SR 4.7.6 requires each snubber be demonstrated operable by performance of the specified augmented inservice inspection program in addition to the requirements of TS 4.0.5, which contains the SRs for inservice inspection and testing of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components. The augmented inservice inspection program in SR 4.7.6 describes inspection types, visual inspections and acceptance criteria, functional tests acceptance criteria and failure analysis, and the snubber service life monitoring program.

2.2 Licensee's Proposed Changes

The licensee requested to revise the TSs for snubbers and add a new TS to the Administrative Controls section of the TSs describing the licensee's Snubber Testing Program. The licensee requested to revise the snubber SR by replacing detailed snubber inspection and testing requirements with a requirement to demonstrate snubber operability in accordance with the licensee-controlled Snubber Testing Program. The licensee also requested to delete a portion of the SR that requires inspections per another TS that is no longer applicable to snubbers. The

⁴ ADAMS Accession No. ML16320A166.

licensee requested to make conforming editorial and administrative changes to the TSs that do not change requirements.

The licensee proposed to revise the ACTION statement in TS 3/4.7.6 as follows, with deletions shown in stricken text and additions underlined:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and ~~perform an engineering evaluation per Specification 4.7.6.f~~ determine the impact on the attached component by evaluation in accordance with Specification 4.7.6, or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

The licensee proposed to revise SR 4.7.6 as follows, with deletions shown in stricken text and additions underlined:

4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the ~~following augmented inservice inspection~~ Snubber Testing Program in Specification 6.8.4.m ~~in addition to the requirements of Specification 4.0.5.~~

The licensee proposed to delete SR 4.7.6.a through g, which are the visual inspection, functional testing, and service life program requirements; delete TS pages 3/4 7-23 through 27; renumber TS pages 3/4 7-28 through 31; and make conforming changes to TS Index page x. The licensee proposed to add the following new TS 6.8.4.m, "Snubber Testing Program," to Section 6.8, "Procedures and Programs," of the Administrative Controls section of the TSs:

Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

- a. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- b. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(a) subject to the use and conditions on the use of standards listed in 10 CFR 50.55a(b) and subject to Commission approval.
- c. The program shall, as required by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements," and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants."
- d. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.

The licensee stated that the proposed changes would replace the specific TS requirements for snubber examination, testing, and service life monitoring with a reference to the Snubber Testing Program thereby ensuring the TS requirements remain consistent with the revised Snubber Testing Program. Attachment 2 of the licensee's application dated April 4, 2016, contains a detailed comparison of the current SR 4.7.6 to the proposed snubber testing program requirements and a justification of the changes. Attachment 3 of the licensee's application contains a copy of the fifth 10-year interval Snubber Testing Program Plan.

2.3 Regulatory Review

The NRC staff reviewed the licensee's application to determine whether (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) activities proposed will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or the health and safety of the public. The NRC staff considered the following regulatory requirements, guidance, and licensing and design-basis information during its review of the proposed changes.

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Paragraph 50.36(a)(1) states that each applicant for an operating license shall include in the application proposed TSs in accordance with the requirements of 10 CFR 50.36.

Paragraph 50.36(c) of 10 CFR requires that the TSs include items in the following categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) LCOs; (3) SRs; (4) design features; and (5) administrative controls. Paragraph 50.36(c)(2) states that when an LCO is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met. Paragraph 50.36(c)(3) states that SRs are requirements relating to test, calibration, or inspection to assure that necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. Paragraph 50.36(c)(5) states that administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

Section 50.90 of 10 CFR states that whenever a holder of an operating license desires to amend the license, application for an amendment must be filed with the Commission fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.

Pursuant to 10 CFR 50.92(a), in determining whether an amendment to a license will be issued to the applicant, the Commission will be guided by the considerations that govern the issuance of initial licenses to the extent applicable and appropriate. As stated in 10 CFR 50.57(a), the Commission is required to find, among other things, that there is reasonable assurance that the activities authorized by the operating license can be conducted without endangering the health and safety of the public, and that such activities will be conducted in compliance with the regulations. It also requires a finding that the issuance of the license will not be inimical to the common defense and security or to the health and safety of the public.

Section 55a(g) of 10 CFR Part 50 has requirements for inservice inspection of Class 1, Class 2, Class 3, Class MC, and Class CC components (including supports). Paragraph 50.55a(g)(5)(ii)

requires that if a revised inservice inspection program for a facility conflicts with the TSs for that facility, the licensee shall apply to the Commission for amendment of the TSs to conform the TSs to the revised program.

Pursuant to 10 CFR 50.55a(b)(3)(v), licensees have the option of using the inservice examination and testing provisions for snubbers in the ASME BPV Code, Section XI or in the ASME OM Code. However, the ASME BPV Code, Section XI option no longer exists when using the 2006 addenda and later editions and addenda of the ASME BPV Code, Section XI because these editions and addenda of Section XI do not provide inservice inspection provisions for snubbers. When using the 2006 addenda or later editions of ASME BPV Code, Section XI, snubber examination and testing must be in accordance with the ASME OM Code, Subsections ISTA and ISTD.

The NRC requires licensees to perform inservice visual inspection and functional testing of snubbers. TSs originally contained these requirements. In the early 1990s, the NRC issued the improved Standard Technical Specifications (STSs)⁵ for various boiling and pressurized water-cooled nuclear power plants based on the criteria in the "Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," which was published in the FR on July 22, 1993 (58 FR 39132). This policy statement was subsequently codified by changes to 10 CFR 50.36, "Technical Specifications." This rulemaking was published in the FR on July 19, 1995 (60 FR 36953). The STSs include deletion of inservice examination and testing requirements of snubbers from the TSs, and placement of those requirements in a plant's Technical Requirements Manual, which is a licensee-controlled document. The staff reviewed the licensee's application using the generically approved guidance in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants, Revision 4.0," Volumes 1 and 2, dated April 2012.⁶ NUREG-1431, Revision 4 reflects the relocation of snubber examination and testing requirements from the TSs to licensee-controlled documents. Although a licensee may remove snubber inservice inspection and testing requirements from the TSs and place them in a licensee-controlled document, the licensee is still required to comply with the requirements in 10 CFR 50.55a, "Codes and standards."

3.0 TECHNICAL EVALUATION

The staff evaluated the licensee's application to determine if the proposed changes are consistent with the guidance, regulations, and plant-specific design and licensing basis information discussed in Section 2.3 of this safety evaluation. The staff reviewed the proposed changes for compliance with 10 CFR 50.36 and 10 CFR 50.55a.

3.1 Addition of TS 6.8.4.m, "Snubber Testing Program"

As stated in 10 CFR 50.55a(b)(v)(B), licensees are required to comply with the provisions for examining and testing of snubbers in Subsection ISTD of the ASME OM Code and make appropriate changes to their TSs or licensee-controlled documents when using the 2006 Addenda and later editions of Section XI of the ASME BPV Code. The ASME BPV Code, Section XI, 2007 Edition with the 2008 Addenda, and the ASME OM Code, 2004 Edition through 2006 Addenda are incorporated by reference in 10 CFR 50.55a. The fifth 10-year inservice inspection interval dates are February 22, 2014 through February 21, 2024, for Turkey

⁵ The improved STSs are contained in NUREG-1430 through 1434, Revision 4.

⁶ ADAMS Accession Nos. ML12100A222 and ML12100A228.

Point 3 and April 15, 2014, through April 14, 2024, for Turkey Point 4. The applicable Code of Record for the Turkey Point 3 and 4 fifth 10-year inservice inspection intervals is the ASME BPV Code, Section XI, 2007 Edition with the 2008 Addenda. The licensee stated in its application that for its fifth 10-year inservice inspection intervals, it would use the ASME OM Code, 2004 Edition through 2006 Addenda (i.e., the code of record for the fifth 10-year inservice testing intervals) for inservice examination and testing of snubbers per 10 CFR 50.55a(b)(v)(B).

The licensee performs snubber inservice examination and testing in accordance with the requirements of TS 3/4.7.6. However, in lieu of the existing TS 3/4.7.6 requirements, the licensee proposes to revise TS 3/4.7.6 to reference the new TS 6.8.4.m, "Snubber Testing Program," in the Administrative Controls section of the TSs, and to relocate the specific snubber examination and testing requirements from SR 4.7.6 to the new licensee-controlled Snubber Testing Program. The licensee stated that the Snubber Testing Program would be based on the new requirements in TS 6.8.4.m.

In Attachments 2 and 3 of its application dated April 4, 2016, the licensee provided a comparison between the TS 3/4.7.6 requirements and the new Snubber Testing Program, which the licensee based on the ASME OM Code, 2004 Edition through 2006 Addenda, and a description of its Snubber Testing Program Plan. The staff reviewed the comparison and concludes that the requirements in TS 3/4.7.6 are equivalent to the new Snubber Testing Program and the requirements in the ASME OM Code, 2004 Edition through 2006 Addenda. Therefore, the staff concludes that the addition of TS 6.8.4.m, "Snubber Testing Program," meets 10 CFR 50.55a(b)(v)(B) and, therefore, provides assurance of safe operation of the facility in accordance with 10 CFR 50.36(c)(5).

3.2 Changes to the Surveillance Requirement

The NRC staff determined that the removal of the snubber inspection and testing requirements from the SR, including the reference to TS 4.0.5, and placement of the requirements in the licensee-controlled Snubber Testing Program Plan is consistent with the guidance in NUREG-1431, Revision 4. Because the Snubber Testing Program will be required to meet 10 CFR 50.55a, which specifies the requirements for snubber inspection and testing, the staff finds that the examination, testing, and service life monitoring for snubbers in accordance with the Snubber Testing Program, as required by the proposed changes to SR 4.7.6, are sufficient to demonstrate whether snubbers are OPERABLE in accordance with LCO 3.7.6 and that the necessary quality of systems and components is maintained, facility operation will be within safety limits, and the LCO will be met. Therefore, the staff finds that the proposed changes to SR 4.7.6 meet 10 CFR 50.36(c)(3).

3.3 Changes to the ACTION Statement

The licensee proposed to revise the ACTION statement in TS 3/4.7.6 to determine the impact of an inoperable snubber on an attached component by evaluation in accordance with the Surveillance Requirement 4.7.6, which refers to TS 6.8.4.m, "Snubber Testing Program." The staff reviewed this change and determined that because TS 6.8.4.m will require the Snubber Testing Program to meet 10 CFR 50.55a, the proposed change to the ACTION statement for LCO 3.7.6 is an adequate remedial action when LCO 3.7.6 is not met. The staff concludes that the proposed changes to the TS 3/4.7.6 ACTION statement are consistent with the requirements in 10 CFR 50.36(c)(2) and, therefore, are acceptable.

3.4 Conforming Changes

The staff finds that the proposed deletions of TS pages 3/4 7-23 through 27, renumbering of TS pages 3/4 7-28 through 31, and changes to TS Index page x are conforming changes that do not change requirements and are therefore acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the NRC staff notified the State of Florida official (Ms. Cynthia Becker, M.P.H., Chief of the Bureau of Radiation Control, Florida Department of Health) on December 16, 2016,⁷ of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the use of facility components located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding, which was published in the FR on December 6, 2016 (81 FR 87971), that the amendments involve NSHC, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the aforementioned considerations, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: February 9, 2017

⁷ The NRC staff notified the State official by telephone and by e-mail (ADAMS Accession No. ML16351A151).

TURKEY POINT NUCLEAR GENERATING UNIT NOS. 3 AND 4 - ISSUANCE OF
AMENDMENTS REGARDING TECHNICAL SPECIFICATIONS FOR SNUBBERS
(CAC NOS. MF7557 AND MF7558)

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