DEC 2 1 2016

L-2016-230
10 CFR 50.90

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

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

License Amendment Request 251, Relocate Select High-Range Noble Gas Effluent Monitors from the Technical Specifications to Licensee-Controlled Documents

Pursuant to 10 CFR Part 50.90, Florida Power& Light Company (FPL) hereby requests an amendment to Renewed Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Nuclear Plant (Turkey Point) Units 3 and 4, respectively. The proposed license amendment revises Turkey Point Technical Specification (TS) 3.3.3.3, Accident Monitoring Instrumentation, by deleting Instrument 19, High Range Noble Gas Effluent Monitors, from Table 3.3-5, Accident Monitoring Instrumentation, and Table 4.3-4, Accident Monitoring Instrumentation Surveillance Requirements, and relocating the requirements for Instruments 19(a), Plant Vent Exhaust, 19(b), Unit 3 Spent Fuel Pit Exhaust, and 19(c), Condenser Air Ejectors, to the Turkey Point Offsite Dose Calculation Manual (ODCM).

The Enclosure to this letter provides FPL's evaluation of the proposed change. Attachment 1 to the enclosure provides the existing TS pages marked up to show the proposed changes. Attachment 2 provides the retyped (clean copy) TS pages with revision bars to identify the proposed changes. Attachment 3 provides existing TS Bases pages marked up to show the proposed changes. The TS Bases changes are provided for information only and will be incorporated in accordance with the TS Bases Control Program upon implementation of the approved amendment.

FPL has determined that the proposed change does not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change. The Turkey Point Onsite Review Group (ORG) has reviewed the proposed license amendment.

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

There are no new commitments made in this submittal.

FPL requests approval of this amendment request by December 20, 2017 and implementation within 90 days.

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

ADD1
NRR

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

Executed on the 21 day of December 2016.

Sincerely,

Thomas Summers
Site Vice President
Turkey Point Nuclear Plant

Enclosure

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

Evaluation of the Proposed Change

Turkey Point Units 3 and 4
License Amendment Request (LAR) No. 251
Relocate Various High Range Noble Gas Effluent Monitors from the
Technical Specifications to Licensee-Controlled Documents

Enclosure

1.0 SUMMARY DESCRIPTION

Florida Power& Light Company (FPL) hereby requests an amendment to Renewed Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Nuclear Plant (Turkey Point) Units 3 and 4, respectively. The proposed license amendment revises Turkey Point Technical Specification (TS) 3.3.3.3, Accident Monitoring Instrumentation, by deleting Instrument 19, High Range Noble Gas Effluent Monitors, from Table 3.3-5, Accident Monitoring Instrumentation, and Table 4.3-4, Accident Monitoring Instrumentation Surveillance Requirements, and relocating the requirements for Instruments 19(a), Plant Vent Exhaust, 19(b), Unit 3 Spent Fuel Pit Exhaust, and 19(c), Condenser Air Ejectors, to the Turkey Point Offsite Dose Calculation Manual (ODCM). The proposed change serves to align the Turkey Point TS more closely with NUREG 1431, Standard Technical Specifications - Westinghouse Plants, Revision 4 (Reference 6.1).

2.0 DETAILED DESCRIPTION

- Table 3.3-5 of TS 3.3.3.3 specifies the INSTRUMENT, TOTAL NUMBER OF CHANNELS, MINIMUM CHANNELS OPERABLE, APPLICABLE MODES and ACTIONS requirements for Accident Monitoring Instrument 19, High Range Noble Gas Effluent Monitors. The proposed change deletes Instrument 19 from Table 3.3-5 by relocating the requirements for Instruments 19(a), Plant Vent Exhaust, 19(b), Unit 3 Spent Fuel Pit Exhaust, and 19(c), Condenser Air Ejectors, to the Turkey Point ODCM. Proposed changes to the relocated requirements will be subject to the provisions of 10 CFR 50.59.

  The proposed change to Table 3.3-5 of TS 3.3.3.3 is as follows:

TABLE 3.3-5
ACCIDENT MONITORING INSTRUMENTATION

	INSTRUMENT	TOTAL NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLI-CABLE MODES	ACTIONS
19.	~~High Range Noble Gas Effluent Monitors~~ ***DELETED***				
	~~a. Plant Vent Exhaust~~	~~1~~	~~1~~	~~ALL~~	~~34~~
	~~b. Unit 3 Spent Fuel Pit Exhaust~~	~~1~~	~~1~~	~~ALL~~	
	~~c. Condenser Air Ejectors~~	~~1~~	~~1~~	~~1, 2, 3~~	~~34~~

- Table 4.3-4 of TS 3.3.3.3 specifies the INSTRUMENT, CHANNEL CHECK and CHANNEL CALIBRATION surveillance requirements (SRs) for Accident Monitoring Instrument 19, High Range Noble Gas Effluent Monitors. The proposed change deletes Instrument 19 from Table 4.3-4 by relocating the SRs for Instruments 19(a), Plant Vent Exhaust, 19(b), Unit 3 Spent Fuel Pit Exhaust, and 19(c), Condenser Air Ejectors, to the Turkey Point ODCM. Proposed changes to the relocated requirements will be subject to the provisions of 10 CFR 50.59.

  The proposed change to Table 4.3-4 of TS 3.3.3.3 is as follows:

TABLE 4.3-4 ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS			
INSTRUMENT		CHANNEL CHECK	CHANNEL CALIBRATION
19.	~~High Range Noble Gas Effluent Monitors~~ ***DELETED***		
	~~a. Plant Vent Exhaust~~	~~SFCP~~	~~SFCP~~
	~~b. Unit 3 Spent Fuel Pit Exhaust~~	~~SFCP~~	~~SFCP~~
	~~c. Condenser Air Ejectors~~	~~SFCP~~	~~SFCP~~

3.0 TECHNICAL EVALUATION

3.1 System Description

3.1.1. Plant Vent Exhaust High-Range Noble Gas Effluent Monitor

Gaseous radioactive effluents released via the Plant Vent Exhaust are monitored for high-range noble gas via Plant Vent Stack Air Particulate Radiation Monitor, RaD-6304. This Special Particulate, Iodine and Noble Gas (SPING) monitor detects radioactive noble gas isotopes passing through the plant vent exhaust to the atmosphere and covers a range from 10^{-7} to 10^{5} micro-curies per cubic-centimeter (µCi/cc) for Xenon (Xe) -133. In addition, the Unit 4 Spent Fuel Pit Vent exhaust is routed through the Plant Vent Exhaust pathway and monitored by RaD-6304. The Plant Vent Exhaust SPING monitor also functions to collect halogens and particulates on filter elements for later analysis, and thereby satisfies the NUREG-0737, Item II.F.1 (Reference 6.2) requirements for noble gas effluent monitoring and for sampling and analysis of plant effluents. The Plant Vent Exhaust SPING monitor transmits a pulse signal to the control console in the computer room where high radiation, intermediate radiation and rate of rise alarms are provided. The alarm setpoints are determined by and set in accordance with the Turkey Point ODCM, as required by the Radioactive Effluent Controls Program.

3.1.2. Condenser Steam Jet Air Ejector High-Range Noble Gas Effluent Monitors

Gaseous radioactive effluents released via the Condenser Steam Jet Air Ejectors are monitored for high-range noble gas activity by Condenser Steam Jet Air Ejector Exhaust Radiation Monitor RaD-3-6417 and RaD-4-6417 (RaD-*-6417) for Units 3 and 4 respectively. These SPING monitors detect radioactive noble gas isotopes discharged from the Steam Jet Air Ejector, which draws the gasses from the Condensers, and have a range from 10^{-7} to 10^{5} µCi/cc for Xe-133. In addition, RaD-*-6417 collect and monitor particulates and halogens from the Condenser Steam Jet Air Ejector outlet flow stream, thereby satisfying NUREG-0737, Item II.F.1 (Reference 6.2) requirements for noble gas effluent monitoring and for sampling and analysis of plant effluents. The alarm setpoints for these monitors are determined by and set in accordance with the methodology and parameters of the Turkey Point ODCM as required by the Radioactive Effluent Controls Program.

3.1.3. Unit 3 Spent Fuel Pit Exhaust High-Range Noble Gas Effluent Monitor

Gaseous radioactive effluents released via the Unit 3 Spent Fuel Pit Vent Exhaust are monitored for high-range noble gas via the Unit 3 Spent Fuel Pit Vent Exhaust Radiation monitor, RaD-3-6418. This SPING monitor detects gaseous radiation passing through the Unit 3 Spent Fuel Pool Vent which includes exhausts from the Unit 3 Spent Fuel Pit and the Unit 3 Cask Handling Facility areas. The Unit 3 Spent Fuel Pit Vent Exhaust monitor consists of a beta-gamma sensitive G-M tube detector and covers a range from 10^{-7} to 10^{5} µCi/cc for Xe-133. The Unit 3 Spent Fuel Pit Vent Exhaust SPING monitor also functions to collect halogens and particulates on filter elements for later analysis, thereby satisfying NUREG-0737, Item II.F.1 (Reference 6.2) requirements for noble gas effluent monitoring and for sampling and analysis of plant effluents. The Unit 3 Spent Fuel Pit Vent Exhaust SPING monitor's alarms are provided on a console in the Cable Spreading Room. The alarm setpoints are determined by and set in accordance with the Turkey Point ODCM.

3.2 Proposed Change

3.2.1. Background

In July 1996, the NRC issued License Amendments Nos. 188 and 182 for Turkey Point Units 3 and 4 (Reference 6.3), which relocated the Radiological Effluent Technical Specifications (RETS) from the Turkey Point TS to the Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) and additionally, incorporated new programmatic radioactive effluent and radiological environmental monitoring controls in TS 6.8.1.f, Radioactive Effluents Control Program. The changes were proposed in accordance with NRC Generic Letter (GL) 89-01, Implementation of Programmatic Controls for Radioactive Effluent Technical Specifications (Reference 6.4), and NUREG-1301, Offsite Dose Calculation Manual Guidance, Standard Radiological Controls for Pressurized Water Reactors (Reference 6.5). As part of the license amendment, the requirements for radioactive gas effluent monitoring of the Plant Vent Exhaust, Condenser Air Ejector Vent Exhaust and the Unit 3 Spent Fuel Building Vent Exhaust areas were relocated to the ODCM. However, the radiological effluent monitoring requirements for these locations were retained in part, in other TS sections including TS 3.3.3.3, Accident Monitoring Instrumentation.

The proposed license amendment revises TS 3.3.3.3, by deleting Instrument 19, High-Range Noble Gas Effluent Monitors, from Table 3.3-5, Accident Monitoring Instrumentation, and Table 4.3-4, Accident Monitoring Instrumentation Surveillance Requirements, and relocating the requirements for Instruments 19(a), Plant Vent Exhaust, 19(b), Unit 3 Spent Fuel Pit Exhaust, and 19(c), Condenser Air Ejectors, to the Turkey Point ODCM.

3.2.2. Removal of Item 19, High Range Noble Gas Effluent Monitors, from TS 3.3.3.3

The purpose of the subject post-accident monitoring instrumentation is to detect and measure concentrations of noble gas fission products in gaseous effluents during and following an accident and to provide plant operators and emergency planning agencies with information on plant releases of noble gases. Per NUREG 1431, Volume 2, Bases (Reference 6.6), the post-accident monitoring instrumentation provided in NUREG 1431, Volume 1, Specifications (Reference 6.1) provides the necessary support for Control Room operators to take manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for Design Basis Accidents.

A comparison against NUREG 1431, Volume 1 (Reference 6.1) reveals that the proposed change does not involve accident monitoring instrumentation recommended for TS inclusion. More specifically, Table 3.3.3-1 of NUREG 1431 does not list any instrumentation being removed from the Turkey Point TS by the proposed change. Moreover, NUREG 1431, Volume 2 (Reference 6.6) states that the instrument channels required to be OPERABLE includes two classes of parameters identified during Unit specific implementation of Regulatory Guide (RG) 1.97, Revision 3, Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident (Reference 6.7), as Type A and Category 1 variables. The premise is repeated in a "Reviewer's Note" to Table 3.3.3-1 of NUREG 1431, Volume 1 (Reference 6.1), which states,

"Table 3.3.3-1 shall be amended for each unit as *necessary to list:*

1. *All Regulatory Guide 1.97, Type A instruments and*

2. *All Regulatory Guide 1.97, Category 1, non-Type A instruments specified in the unit's Regulatory Guide 1.97, Safety Evaluation Report."*

Per RG 1.97, Type A applies to variables that provide primary information needed to permit Control Room operating personnel to take the specified manually controlled actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for design basis accident events. Category 1 applies to instruments necessary to determine whether other systems important to safety are performing their intended function.

The following listing of instrumentation being removed from Turkey Point TS 3.3.3.3 by the proposed change identifies the RG 1.97 specified variable, functional Type and Category, as specified in Section 7.5.4, Regulatory Guide 1.97, Revision 3, of the Turkey Point Units 3 and 4 Updated Final Safety Analysis Report (FSAR).

RG 1.97 Variable	Description / Instrument	Type	Cat.
Rx Coolant Press. Boundary Effluent Radioactivity - Noble Gas Effluent from Condenser Air Removal System Exhaust	Condenser Air Ejector Exhaust Monitor (RaD-*-6417)	C	3
Containment Effluent Radioactivity Noble Gas from Identified Release Points	Plant Vent Stack Wide Range Monitor (RaD-6304)	C	2
	Condenser Air Ejector Exhaust Monitor (RaD-*-6417)	C	2
	Spent Fuel Pool Vent Monitor (RaD-3-6418) (Unit 3 Only)	C	2

Containment Effluent Radioactivity Noble Gas (from Buildings or Areas, etc.)	Plant Vent Stack Wide Range Monitor (RaD-6304)	C	2
	Spent Fuel Pool Vent Monitor (RaD-3-6418) (Unit 3 Only)	C	2
Condenser Air Removal System	Condenser Air Ejector Exhaust Monitor (RaD-*-6417)	E	2
Common Vent - Noble Gases	Plant Vent Stack Wide Range Monitor (RaD-6304)	E	2
All Other Identified Release Points	Spent Fuel Pool Vent Monitor (RaD-3-6418) (Unit 3 Only)	E	2
Particulates & Halogens - All Identified Plant Release Points	Plant Vent Stack Wide Range Monitor (RaD-6304)	E	3
	Spent Fuel Pool Vent Monitor (RaD-3-6418) (Unit 3 Only)	E	3

As can be seen, the proposed change does not affect any instruments that involve RG 1.97 Type A, or Category 1 variables. Moreover, the subject instrumentation are not required for safety systems to accomplish any specified safety function, and are not subject to environmental or seismic qualification, physical or electrical separation, or backup (emergency) power capability. As such, the instruments are not required for TS inclusion as post-accident monitoring instrumentation based upon NUREG 1431, Volume 2 (Reference 6.6)

Additionally, 10 CFR 50.36(c)(2)(ii) establishes criteria for TS inclusion including Limiting Conditions of Operation (LCO). Evaluating the proposed changes against the 10 CFR 50.36(c)(2)(ii) criteria reveals that the proposed changes do not involve instrumentation subject to TS inclusion as an LCO, as indicated below:

(A) Criterion 1: Installed instrumentation that is used to detect, and indicate in the Control Room, a significant abnormal degradation of the reactor coolant pressure boundary.

The Plant Vent, Condenser Steam Jet Air Ejector and Unit 3 Spent Fuel Pit high-range noble gas monitoring instrumentation function to measure and display high-range noble gas activity in their respective exhaust vent paths in order to quantify radioactive releases during and following a design basis accident. The subject monitors satisfy RG 1.97 as Type C variables and hence by definition, have the capability to provide information indicative of a potential for being breached or the actual breach of the barriers to fission product release. However, the monitors are neither the only nor the most direct indication used for this diagnosis. The Plant Vent, Condenser Steam Jet Air Ejector and Unit 3 Spent Fuel Pit high-range noble gas monitors are designated for indicating system operating status and providing diagnostic information to other primary indicators of radioactive releases. Hence, the monitors are not construed as necessary to determine whether other systems important to safety are performing their intended functions, a feature characteristic of a RG 1.97, Category 1 variable required for TS inclusion. The operability of the Plant Vent, Condenser SJAE and Unit 3 Spent Fuel Pit high-range noble gas monitors are not credited in the mitigation of any design basis accident.

As such, the subject monitors are not used as a primary means to detect, and indicate in the Control Room, a significant abnormal degradation of

the reactor coolant pressure boundary. These instruments do not satisfy Criterion 1.

(B) Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The subject monitoring instrumentation are not process variables, design features, or operating restrictions that are an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Plant Vent, Condenser Steam Jet Air Ejector or Unit 3 Spent Fuel Pit Exhaust high-range noble gas monitoring instrumentation cannot initiate a design basis accident or transient. These instruments do not satisfy Criterion 2.

(C) Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The subject monitoring instrumentation are not part of the primary success path for accident or transient mitigation. Accident analyses do not credit automatic or manual action of the Plant Vent, Condenser Steam Jet Air Ejector or Unit 3 Spent Fuel Pit Exhaust high-range noble gas monitoring instrumentation as part of any primary success path for design basis accident mitigation. These instruments do not satisfy Criterion 3.

(D) Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The Plant Vent, Condenser Steam Jet Air Ejector or Unit 3 Spent Fuel Pit Exhaust high-range noble gas monitoring instrumentation are not Maintenance Rule risk-significant components, are not credited in either Units' Probabilistic Risk Assessment (PRA) and are not of significant risk to public health and safety. These instruments do not satisfy Criterion 4.

Regarding the relocation of the TS requirements to the ODCM, Federal Register Notice 58 FR 39132 (Reference 6.8) contains the NRC's Final Policy Statement for TS improvements for nuclear power reactors. In reference to the 10 CFR 50.36(c)(2)(ii) criteria for TS inclusion, the Policy Statement 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.*

The proposed change relocates the high-range noble gas monitoring requirements and SRs for the Plant Vent, Condenser Steam Jet Air Ejector and Unit 3 Spent Fuel Pit exhaust pathways to the ODCM and applicable implementing procedures. FSAR references to the current TS requirements will

be updated accordingly. However, the accident monitoring functions for these instruments remain and no changes to their respective FSAR descriptions are proposed. The current TS required number of channel(s), applicable MODES and actions for inoperability do not change. In addition, the instrument channel checks and calibrations will continue to be performed in accordance with the Surveillance Frequency Control Program (SFCP). Any changes to the ODCM, FSAR or applicable plant implementing procedures will be controlled in accordance with 10 CFR 50.59.

In summary, the Plant Vent, Condenser Steam Jet Air Ejector and Unit 3 Spent Fuel Pit high-range noble gas monitoring instrumentation are not RG 1.97 Type A, or Category 1 variables, are not listed in NUREG 1431 (Reference 6.1) as post-accident monitoring instrumentation, and do not meet the 10 CFR 50.36(c)(2)(ii) criteria for TS inclusion. Furthermore, the proposed changes are administrative in nature and will not result in changes in the manner or frequency in which the subject instrumentation is maintained. The post-accident monitoring requirements for these instruments will be relocated to the ODCM and applicable plant procedures where future changes will be subject to the requirements of 10 CFR 50.59. As such, deleting Instrument 19, High Range Noble Gas Effluent Monitors, from TS 3.3.3.1, Table 3.3-5 and Table 4.3-4, by relocating the requirements for Instruments 19(a), Plant Vent Exhaust, 19(b), Unit 3 Spent Fuel Pit Exhaust, and 19(c), Condenser Air Ejectors, to the Turkey Point ODCM is reasonable.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

- 10 CFR 50.36, Technical Specifications, requires the establishment of an LCO for any structure, system or component (SSC) satisfying the criteria of 10 CFR 50.36(c)(2)(ii).

- NUREG-0737, Clarification of TMI Action Plan Requirements, identifies the items for which TS are required to provide assurance that facility operation is maintained within acceptable following implementation at each facility. Section II.F.1 of NUREG-0737 specifies requirements for accident monitoring instrumentation including noble gas monitoring and iodine/particulate sampling.

- 1967 Proposed General Design Criteria (GDC) 17 requires that means shall be provided for monitoring the containment atmosphere and the facility effluent discharge paths for radioactivity released from normal operations, from anticipated transients, and from accident conditions. An environmental monitoring program shall be maintained to confirm that radioactivity released to the environs of the plant have not been excessive.

- 1967 Proposed GDC 18 requires that monitoring and alarm instrumentation shall be provided for fuel and waste storage and associated handling areas for conditions that might result in loss of capability to remove decay heat and to detect excessive radiation levels.

- Generic Letter (GL) 83-37, NUREG-0737 Technical Specifications, requested licensees to provide applications for license amendments for applicable NUREG-0737 items, including noble gas effluent monitors considered helpful to the operator in accessing the plant condition during and following an accident. GL 83-37 further stated that it is desired that these monitors be operable at all times during plant operation, but they are not required for safe shutdown of the plant.

- RG 1.97, Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident, Revision 3, establishes the minimum number of variables to be monitored by the Control Room operating personnel during and following an accident. RG 1.97 defines Type C variables as variables that provide information to indicate the potential for being breached or the actual breach of the barriers to fission product releases; Type E variables as variables to be monitored as required for use in determining the magnitude of the release of radioactive materials and continually assessing such releases. For design and qualification, RG 1.97 states that Category 2 provides for qualification but does not include seismic, redundancy, continuous display or standby power; Category 3 provides for commercial-grade equipment that requires only offsite power.

The proposed change complies with the requirements of 10 50.36(c)(2)(ii) and does not alter the manner in which plant radiological monitoring functions are operated and maintained, consistent with 1967 Proposed GDC(s) 17 and 18, NUREG-0737, and RG1.97. All applicable regulatory requirements will continue to be satisfied as a result of this proposed change.

4.2 No Significant Hazards Consideration

FPL has evaluated whether o a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, Issuance of amendment, as discussed below.

1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The Plant Vent Exhaust, Condenser Air Ejectors Exhaust and Unit 3 Spent Fuel Pit Exhaust high-range noble gas monitoring instrumentation are not an initiator of any accidents previously evaluated, so the probability of accidents previously evaluated is unaffected by the proposed changes. The proposed changes will not impact any plant systems such that previously analyzed structures, systems, and components (SSCs) would be more likely to fail. The proposed changes do not adversely affect the protective and mitigative capabilities of the plant nor the offsite and control room dose projections associated with any design basis accident described in the FSAR.

Therefore, the proposed changes do not result in a significant increase in the probability or consequences of an accident previously evaluated.

2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change removes the subject instruments from the accident monitoring TS and as such is an administrative change in nature. The Plant Vent Exhaust, Condenser Air Ejectors Exhaust and Unit 3 Spent Fuel Pit Exhaust high-range noble gas monitoring instrumentation will continue to perform their specified function. Removal of the monitors from the TS will not create the possibility of a new or different kind of accident. No new or different interactions

with safety related systems or components are created. The proposed changes will not introduce new failure mechanisms, malfunctions, or accident initiators not already considered in the design and licensing bases. The possibility of a new or different malfunction of safety-related equipment is not created. No new accident scenarios, transient precursors, or limiting single failures are introduced as a result of these changes. There will be no adverse effects or challenges imposed on any safety-related system as a result of the proposed changes.

Therefore, the proposed changes do not create the possibility of a new or different accident from any accident previously evaluated.

3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed change relocates the Plant Vent Exhaust, Condenser Air Ejectors Exhaust and Unit 3 Spent Fuel Pit Exhaust high-range noble gas monitoring requirements from TS 3.3.3.3, Accident Monitoring, to the Turkey Point ODCM, and as such is an administrative change in nature. The changes do not adversely impact plant operating margins or the reliability of equipment credited in the safety analyses. Consequently, there will be no change in the ability to monitor post-accident plant conditions, radionuclide releases, and public doses. The safety analyses acceptance criteria are not affected by these changes. The proposed changes will not result in plant operation outside of the design basis.

Therefore, operation in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the above, FPL concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(b), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusions

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

5.0 ENVIRONMENTAL CONSIDERATION

FPL has evaluated the proposed amendment for environmental considerations. The review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set for in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

6.0 REFERENCES

6.1 NUREG-1431, Standard Technical Specifications - Westinghouse Plants, Revision 4.0, Volume 1, Specifications (Accession No. ML12100A222)

6.2 NUREG-0737, Clarification of TMI Action Plan Requirements, dated November 1980. (ML051400209)

6.3 NRC Letter from R. Croteau to T. F. Plunkett (FPL), Turkey Point Units 3 and 4 -Issuance of Amendments Re: Relocation of Radiological Effluent Technical Specifications (TAC Nos. M95077 and M95078) dated July 31, 1996. (ML013390265)

6.4 Generic Letter (GL) 89-01, Implementation of Programmatic Controls for Radioactive Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program

6.5 NUREG-1301, Offsite Dose Calculation Manual Guidance, Standard Radiological Controls for Pressurized Water Reactors (ML091050061)

6.6 NUREG-1431, Standard Technical Specifications - Westinghouse Plants, Revision 4.0, Volume 2, Bases (Accession No. ML12100A228)

6.7 Regulatory Guide 1.97, Revision 3, Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident, May 1983. (ML003740282)

6.8 NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors,' dated July 22, 1993 (58 FR 39132)

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION PAGES (MARKUP)

(2 pages follow)

TABLE 3.3-5 (Continued)

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	TOTAL NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLI-CABLE MODES	ACTIONS
14. In Core Thermocouples (Core Exit Thermocouples)	4/core quadrant	2/core quadrant	1, 2, 3	31, 32
15. Containment High Range Area Radiation	2	1	1, 2, 3	34
16. Reactor Vessel Level Monitoring System	2(1)	1(1)	1, 2, 3	37, 38
17. Neutron Flux, Backup NIS (Wide Range)	2	1	1, 2, 3	31, 32
18. DELETED				
19. ~~High Range Noble Gas Effluent Monitors~~				
~~a. Plant Vent Exhaust~~	~~1~~	~~1~~	~~ALL~~	~~34~~
~~b. Unit 3 Spent Fuel Pit Exhaust~~	~~1~~	~~1~~	~~ALL~~	~~34~~
~~c. Condenser Air Ejectors~~	~~1~~	~~1~~	~~1, 2, 3~~	~~34~~
20. RWST Water Level	2	1	1, 2, 3	31, 32
21. Steam Generator Water Level (Narrow Range)	2/stm. Gen.	1/stm. Gen.	1, 2, 3	31, 32
22. Containment Isolation Valve Position Indication*	1/valve	1/valve	1, 2, 3	39

TABLE NOTATIONS

1. A channel is eight sensors in a probe. A channel is OPERABLE if a minimum of four sensors are OPERABLE.

2. Inputs to this instrument are from instrument items 3, 4, 5 and 14 of this Table.

* Applicable for containment isolation valve position indication designated as post-accident monitoring instrumentation (containment isolation valves which receive containment isolation Phase A, Phase B, or containment ventilation isolation signals).

TABLE 4.3-4

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

	INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1.	Containment Pressure (Wide Range)	SFCP	SFCP
2.	Containment Pressure (Narrow Range)	SFCP	SFCP
3.	Reactor Coolant Outlet Temperature - T_{HOT} (Wide Range)	SFCP	SFCP
4.	Reactor Coolant Inlet Temperature - T_{COLD} (Wide Range)	SFCP	SFCP
5.	Reactor Coolant Pressure - Wide Range	SFCP	SFCP
6.	Pressurizer Water Level	SFCP	SFCP
7.	Auxiliary Feedwater Flow Rate	SFCP	SFCP
8.	Reactor Coolant System Subcooling Margin Monitor	SFCP	SFCP
9.	PORV Position Indicator (Primary Detector)	SFCP	SFCP
10.	PORV Block Valve Position Indicator	SFCP	SFCP
11.	Safety Valve Position Indicator (Primary Detector)	SFCP	SFCP
12.	Containment Water Level (Narrow Range)	SFCP	SFCP
13.	Containment Water Level (Wide Range)	SFCP	SFCP
14.	In Core Thermocouples (Core Exit Thermocouples)	SFCP	SFCP
15.	Containment - High Range Area Radiation Monitor	SFCP	SFCP*
16.	Reactor Vessel Level Monitoring System	SFCP	SFCP
17.	Neutron Flux, Backup NIS (Wide Range)	SFCP	SFCP
18.	DELETED		
~~19.~~	~~High Range - Noble Gas Effluent Monitors~~		
	~~a. Plant Vent Exhaust~~	~~SFCP~~	~~SFCP~~
	~~b. Unit 3 - Spent Fuel Pit Exhaust~~	~~SFCP~~	~~SFCP~~
	~~c. Condenser Air Ejectors~~	~~SFCP~~	~~SFCP~~
20.	RWST Water Level	SFCP	SFCP
21.	Steam Generator Water Level (Narrow Range)	SFCP	SFCP
22.	Containment Isolation Valve Position Indication	SFCP	SFCP

*Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION PAGES (CLEAN COPY)

(2 pages follow)

TABLE 3.3-5 (Continued)

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	TOTAL NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLI-CABLE MODES	ACTIONS
14. In Core Thermocouples (Core Exit Thermocouples)	4/core quadrant	2/core quadrant	1, 2, 3	31, 32
15. Containment High Range Area Radiation	2	1	1, 2, 3	34
16. Reactor Vessel Level Monitoring System	2(1)	1(1)	1, 2, 3	37, 38
17. Neutron Flux, Backup NIS (Wide Range)	2	1	1, 2, 3	31, 32
18. DELETED				
19. DELETED				
20. RWST Water Level	2	1	1, 2, 3	31, 32
21. Steam Generator Water Level (Narrow Range)	2/stm. Gen.	1/stm. Gen.	1, 2, 3	31, 32
22. Containment Isolation Valve Position Indication*	1/valve	1/valve	1, 2, 3	39

TABLE NOTATIONS

1. A channel is eight sensors in a probe. A channel is OPERABLE if a minimum of four sensors are OPERABLE.

2. Inputs to this instrument are from instrument items 3, 4, 5 and 14 of this Table.

* Applicable for containment isolation valve position indication designated as post-accident monitoring instrumentation (containment isolation valves which receive containment isolation Phase A, Phase B, or containment ventilation isolation signals).

TABLE 4.3-4

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

	INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1.	Containment Pressure (Wide Range)	SFCP	SFCP
2.	Containment Pressure (Narrow Range)	SFCP	SFCP
3.	Reactor Coolant Outlet Temperature - T_{HOT} (Wide Range)	SFCP	SFCP
4.	Reactor Coolant Inlet Temperature - T_{COLD} (Wide Range)	SFCP	SFCP
5.	Reactor Coolant Pressure - Wide Range	SFCP	SFCP
6.	Pressurizer Water Level	SFCP	SFCP
7.	Auxiliary Feedwater Flow Rate	SFCP	SFCP
8.	Reactor Coolant System Subcooling Margin Monitor	SFCP	SFCP
9.	PORV Position Indicator (Primary Detector)	SFCP	SFCP
10.	PORV Block Valve Position Indicator	SFCP	SFCP
11.	Safety Valve Position Indicator (Primary Detector)	SFCP	SFCP
12.	Containment Water Level (Narrow Range)	SFCP	SFCP
13.	Containment Water Level (Wide Range)	SFCP	SFCP
14.	In Core Thermocouples (Core Exit Thermocouples)	SFCP	SFCP
15.	Containment - High Range Area Radiation Monitor	SFCP	SFCP*
16.	Reactor Vessel Level Monitoring System	SFCP	SFCP
17.	Neutron Flux, Backup NIS (Wide Range)	SFCP	SFCP
18.	DELETED		
19.	DELETED		
20.	RWST Water Level	SFCP	SFCP
21.	Steam Generator Water Level (Narrow Range)	SFCP	SFCP
22.	Containment Isolation Valve Position Indication	SFCP	SFCP

*Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION BASES PAGES (MARKUP)

(3 pages follow)

ATTACHMENT 2
Technical Specification Bases
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3/4.3.3.3 (Continued)

Technical Specification Table 3.3-5, Item 14, Incore Thermocouples (Core Exit Thermocouples), utilizes the term channel. There are **NO** channels of Incore Thermocouples as stated previously, the term Channel refers to one of the two QSPDS channels. NUREG 0737, Section II.F.2, Attachment 1, Item (3) describes what is required from instrumentation standpoint: A display should be provided with the capability for selective reading of a minimum of 16 OPERABLE thermocouples, four from each core quadrant. This description is the basis for our Technical Specification, and clarifies the requirement for Incore Thermocouples. If we have fewer than four thermocouples per core quadrant, Action 31 applies. If we have fewer than two thermocouples per quadrant, Action 32 applies. There is **NO** regulatory requirement that these two or four thermocouples per core quadrant be assigned to or divided between the two channels of QSPDS. The column heading TOTAL NO. OF CHANNELS, is also misleading for the Incore Thermocouples. There are more than four thermocouples in every core quadrant. It takes four thermocouples per core quadrant to satisfy the Technical Specifications and unrestricted operation with fewer than the TOTAL, but at least the MINIMUM is **NOT** allowed. For example, if there are only three operable thermocouples in a quadrant, in 30 days one must be fixed or a Special Report submitted within the next 14 days.

~~19c High Range Noble Gas Condenser Air Ejector~~

~~TS Table 3.3 5, Accident Monitoring Instrumentation, Item 19c, requires one Channel of High Range Noble Gas Effluent Monitoring for Condenser Air Ejectors to be OPERABLE in MODES 1, 2, and 3. The Steam Jet Air Ejector (SJAE) Special Particulate, Iodine, and Noble Gas (SPING) monitor (RAD 6417) provides this function.~~

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~~The SJAE SPING utilizes an internal sample pump to continuously sample and monitor the discharge from the air ejector exhaust header. The SJAE SPING includes piping, valves, and connections to permit normal sampling and to allow for connecting portable sampling equipment or obtaining grab samples. The SJAE SPING includes multiple detection channels that provide monitoring of the range of noble gases required by Regulatory Guide 1.97, Revision 3 (1.0E-06 to 1.0E-02 µCi/cc) and the extended range prescribed in NUREG-0737 (to a maximum of 1.0E+05 µCi/cc). The SJAE SPING is capable of providing continuous sampling and periodic monitoring of radioiodines and particulates using filter cartridges. The SJAE SPING provides three separate detection channels of noble gas. The ranges include the upper range Channel 9 (1.0E+00 to 1.0E+05 µCi/cc), the mid range Channel 7 (2.5E-02 to 4.0E+02 µCi/cc), and the low range Channel 5 (1.0E-07 to 6.0E-02 µCi/cc). Inoperability of any one of the three noble gas detection channels requires entry in Action 34 which requires initiation of a preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours.~~

~~Due to multiple detector channels and sampling configurations provided by the SJAE SPING, the preplanned alternate methods vary with the condition and extent of the inoperability. The inoperability of any single detection channel does **NOT** render the entire SJAE SPING inoperable as long as sample flow to the remaining detection channels is maintained.~~

~~Failure of the SJAE SPING sample pump (or any failure which prevents the required sample air from flowing through the detectors) disables all SJAE SPING monitoring capabilities and requires entry into Action 34 and implementation of alternate preplanned methods for each of the noble gas detection channels. With the sample flow path to the SJAE SPING still available, installation of the alternate sample rig to the SJAE SPING sample inlet line provides the capability to obtain radioiodine and particulate samples, monitor flow, and obtain gas grab samples. Note that installation of the alternate sampling rig provides a preplanned alternate method for obtaining samples, but does **NOT** restore OPERABILITY of the SJAE SPING high range noble gas monitoring function.~~

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~~Failure of SJAE SPING Channel 5 requires entry into Action 34. An alternate method of monitoring the noble gas is to use Process Radiation Monitoring System (PRMS) R-15 (1.0E-06 to 1.0E-03 µCi/cc) until the channel range is exceeded. With the SJAE SPING Channel 5 inoperable and the range of PRMS R-15 exceeded, obtain grab samples every 12 hours.~~

~~Failure of SJAE SPING Channel 7 requires entry into Action 34. An alternate method of monitoring the noble gas is to use SJAE SPING Channel 5 or PRMS R-15 until the range of these channels is exceeded. With the SJAE SPING Channel 5 and PRMS R-15 inoperable, or their ranges exceeded, main steam can be sampled every 12 hours, or obtain grab samples every 12 hours until the level is within the monitoring range provided by detection Channel 9.~~

~~Failure of SJAE SPING Channel 9 requires entry into Action 34. An alternate method of monitoring the noble gas is to use SJAE SPING Channel 5 or PRMS R-15 until the range of these channels is exceeded. With the SJAE SPING Channel 5 and PRMS R-15 inoperable or their ranges exceeded, obtain grab samples every 12 hours.~~

3/4.3.3.4 Deleted

3/4.3.3.5 Radioactive Liquid Effluent Monitoring Instrumentation

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The Alarm/Trip Setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50.