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 50-251 TURKEY POINT PLANT, UNIT 4, FLORIDA POWER AND LIGHT C 05000251
 AUTH.NAME AUTHOR AFFILIATION
 URHIG,R.E. FLORIDA POWER & LIGHT CO.
 RECIP.NAME RECIPIENT AFFILIATION
 STELLO,V. DIVISION OF OPERATING REACTORS

SUBJECT: FORWARDS REQUESTED AMEND APP A OF LICENSES DPR-31 & DPR-41.
 AFFIDAVIT & SAFETY EVALUATION ENCL.

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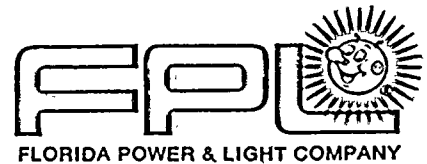
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May 2, 1979
L-79-109

Office of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed Amendment to Facility
Operating Licenses DPR-31 and DPR-41

In accordance with 10 CFR 50.30, Florida Power & Light Company (FPL) submits herewith three (3) signed originals and forty (40) copies of a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41.

In the FPL response to IE Bulletin 79-06A (Review of Operational Errors and System Misalignments Identified during the Three Mile Island Incident), it was stated that FPL was evaluating, with the NSSS supplier, control circuit logic modifications necessary to automatically actuate safety injection exclusive of pressurizer level (Response 3, page 1). The purpose of this proposal is to present the result of the joint evaluation and the consequent Technical Specification changes.

The proposed changes are described below and shown on the attached Technical Specification pages bearing the date of this letter in the lower right hand corner.

Table 3.5-2

Pressurizer Low Level and an attendant footnote are deleted from Item 1.4.

Table 3.5-4

Pressurizer Low Level is deleted from Item 3.

In the interim, we are operating at your request with the pressurizer level bistables in the tripped mode, thereby establishing a situation in which a single spurious signal in the pressurizer pressure logic could initiate safety injection. The proposed amendment will re-establish "2 out of 3" logic and decrease the potential for a spurious trip. We understand you will promptly process this request.

The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power & Light Company Nuclear

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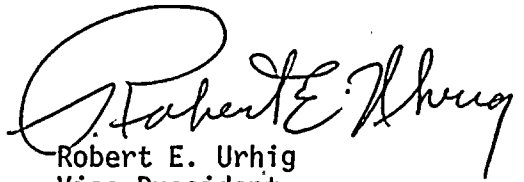
Office of Nuclear Reactor Regulation
Mr. Victor Stello, Director
Division of Operating Reactors

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Review Board. They have concluded that it does not involve an
unreviewed safety question.

In accordance with 10 CFR 170.22, we have determined this amendment
to be a Class III and Class I amendment and have enclosed a check
for four thousand four hundred dollars (\$4,400.00)..

Very truly yours,



Robert E. Urhig
Vice President
Advanced Systems & Technology

REU:GDW:cf

Attachment

cc: Mr. James P. O'Reilly, Region II
Robert Lowenstein, Esquire

TABLE 3.5-2

ENGINEERED SAFETY FEATURES ACTUATION

NO.	FUNCTIONAL TEST	1 MIN. OPERABLE CHANNELS	2 MIN. DEGREE OF REDUN- DANCY	3 OPERATOR ACTION IF CONDITIONS OF COLUMN 1 OR 2 CANNOT BE MET
1.	SAFETY INJECTION			
1.1	Manual	1	0	Cold Shutdown
1.2	High Containment Pressure	2	1	Cold Shutdown
1.3	High Differential Pressure between any Steam Line and the Steam Line Header	2	1	Cold Shutdown
1.4	Pressurizer Low Pressure*	2	1	Cold Shutdown
1.5	High Steam Flow in 2/3 Steam Lines with Low T_{avg} or Low Steam Line Pressure	1/line in each of 2 lines	1	Cold Shutdown
2	CONTAINMENT SPRAY			
2.1	High Containment Pressure and High-High Containment Pressure (Coincident)	2 per set	1/set	Cold Shutdown

* - This signal may be manually bypassed, when the reactor is shut down and pressure is below 2000 psig.

TABLE 3.5-4

ENGINEERED SAFETY FEATURE
SET POINTS

NO.	FUNCTIONAL UNIT	CHANNEL ACTION	SET POINT
1.	High Containment Pressure	Safety Injection Containment Spray* Steam Line Isolation* Containment Isolation*	≤ 6 psig
2.	High-High Containment Pressure	See No. 1	≤ 30 psig
3.	Pressurizer Low Pressure	Safety Injection	≥ 1715 psig
4.	High Steam Line Differential Pressure (2/3 between any header and any line)	Safety Injection	≤ 150 psi
5.	High Steam Line Flow (2/3 lines)	Safety Injection Steam Line Isolation	d/p for $3.84 \cdot 10^6$ lb/hr, 770 psig, 100% RP d/p for $0.64 \cdot 10^6$ lb/hr, 1005 psig, 0% RP d/p linear with 1st stg. press., 0-100% RP
	Coincident with:		
	Low Steam Line Pressure, Or		≥ 600 psig
	Low T_{avg} .		≥ 531 F

* High and High-High coincident

SAFETY EVALUATION

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 & 50-251
Proposed Tech Spec Amendment.
Safety Injection Trip Logic

I. Introduction

This evaluation supports a proposal to delete reference to Pressurizer Low Level from Table 3.5-2 (Engineered Safety Features Actuation) and Table 3.5-4 (Engineered Safety Features Set Points),

II. Discussion

The NSSS vendor has performed a safety review of safety injection actuation logic modifications for application to the Turkey Point Nuclear Units. The existing logic will be modified by deleting the low pressurizer pressure coincident with low pressurizer level actuation logic and converting the protection system to a two-out-of-three low pressurizer pressure actuation only.

The basis for this modification utilizes the three existing pressurizer pressure channels for safety injection actuation and two channels for control system functions. Control and protection requirements set forth in IEEE-279 are addressed by the two separate pressure control channels such that a single pressure transmitter failure will not cause power operated relief valve actuation.

All current ECCS analyses are valid and appropriate for plants with safety injection initiation as a function of pressurizer pressure signals only. Previously, safety injection was initiated on coincident pressurizer pressure and level signals. The effect of changing to a pressure only signal will result in either an earlier initiation of safety injection, or no change in the time of safety injection initiation for all break locations. For small breaks in the pressurizer, the pressure only signal will assure SI actuation. Therefore, current small break analysis assumptions concerning safety injection initiation time are appropriate. Additionally, the effect of safety injection initiation time on peak clad temperature is negligible when initiation times being considered correspond to RCS pressures above 1400 psia. The switch to a pressure only safety injection signal results in a negligible impact on large break analyses.

Based upon the conclusions reached during reviews by the NSSS vendor and by Florida Power & Light Company, the change proposed to the Safety Injection System control circuit logic does not introduce additional safety concerns, and does not involve an unreviewed safety question.

III. Conclusion

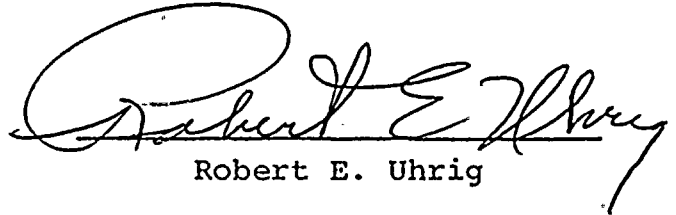
We have concluded, based on the considerations discussed above, that: (1) the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

2nd day of May, 1979

Betty Brittain
NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION - EXPIRES MARCH 27, 1982
BONDED THRU MAYNARD BONDING AGENCY