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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co 05000251
 AUTH. NAME: AUTHOR AFFILIATION
 UHRIG, R. E. Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION

SUBJECT: Request amends to Licenses DPR-31 & DPR-41 revising Tech
 Specs re control rod position & rod position indication,
 Tech Specs Pages 3.2-2 & 3.2-3 & Table 4.1-1. encl.

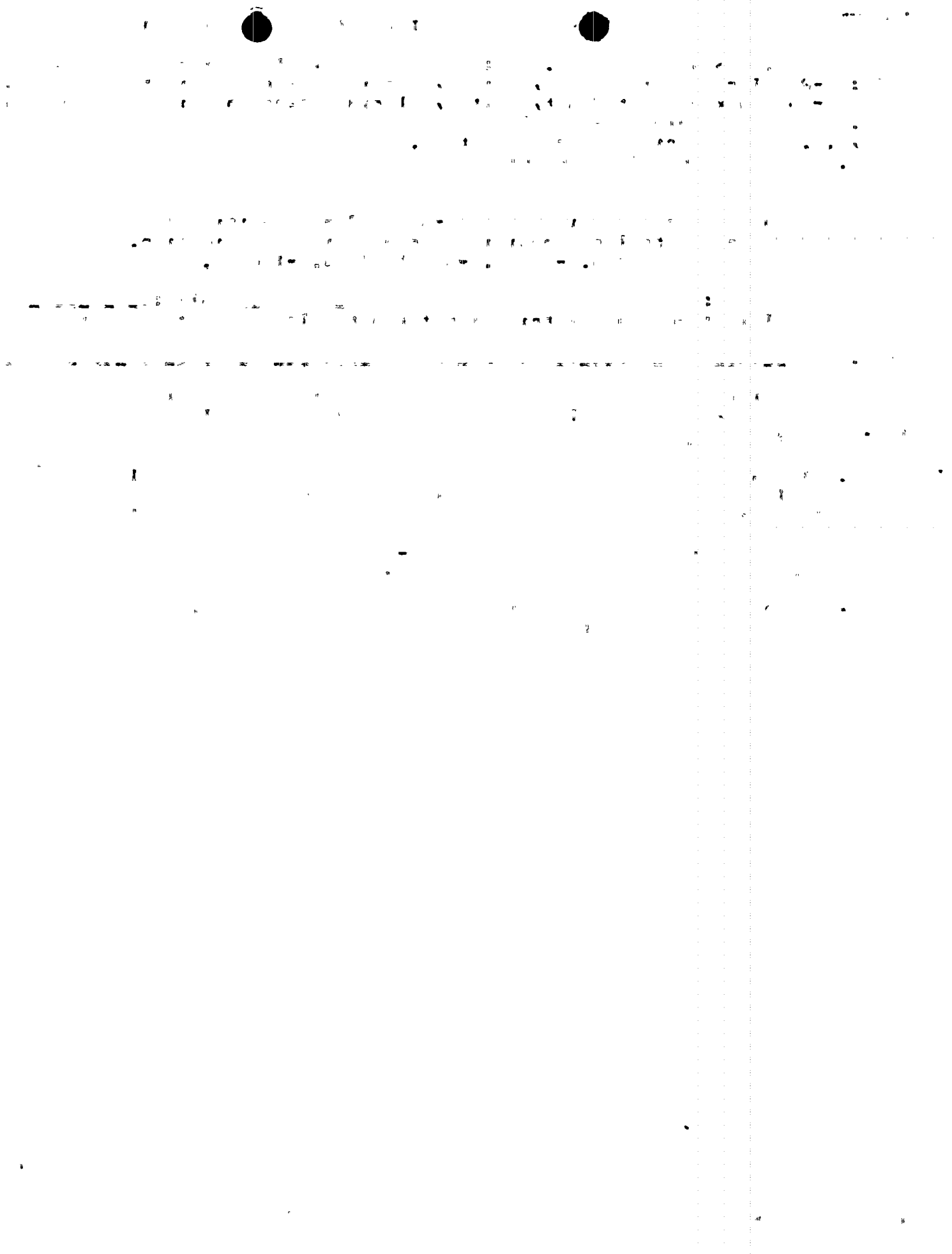
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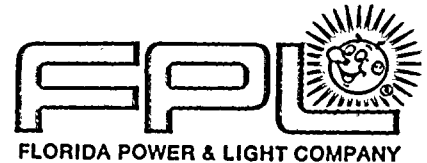
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Director of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhower, Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

February 27, 1980
L-80-62

Dear Mr. Eisenhower:

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 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. This proposal is submitted in response to A. Schwencer's letter of October 29, 1979 on control rod position and rod position indication.

The proposed amendment is described below and shown on the accompanying Technical Specification pages bearing the date of this letter in the lower right hand corner.

Pages 3.2-2 and 3.2-3

Technical Specifications 3.2.2 and 3.2.4.b are revised to change the control rod misalignment limit from "15 inches" to "12 steps".

Table 4.1-1, Sheet 1, Item 9

A note is added to the "Remarks" section of Item 9 (Analog Rod Position) to specify that indicated position be calibrated to within 12 steps of actual position.

The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power & Light Company Nuclear Review Board. They have concluded that it does not involve an unreviewed safety question.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/cph

Attachment

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

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- f. Except for low power physics tests, the shutdown margin with allowance for a stuck control rod shall exceed the applicable value shown on Figure 3.2-2 under all steady-state operating conditions from zero to full power, including effects of axial power distribution. The shutdown margin as used here is defined as the amount by which the reactor core would be subcritical at hot shutdown conditions (540 F) if all control rods were tripped, assuming that the highest worth control rod remained fully withdrawn, and assuming no changes in xenon, boron concentration or part-length rod position.
- g. During physics tests and control rod exercises, the insertion limits need not be met, but the required shutdown margin, Figure 3.2-2 must be maintained or exceeded.

2. MISALIGNED CONTROL ROD

If a part length* or full length control rod is more than 12 steps out of alignment with its bank, and is not corrected within 8 hours power shall be reduced so as not to exceed 75% of interim power for 3 loop or 45% of interim power for two loop operation, unless the hot channel factors are shown to be no greater than allowed by Section 6a of Specification 3.2.

3. ROD DROP TIME

The drop time for each control rod shall be no greater than 1.8 seconds at full flow and operating temperature from the beginning of rod motion to dashpot entry.

4. INOPERABLE CONTROL RODS

- a. No more than one inoperable control rod shall be permitted during sustained power operation, except it shall not be permitted if the rod has a potential reactivity insertion upon ejection greater than $0.3\% \Delta k/k$ at rated power. Inoperable rod worth shall be determined within 4 weeks.
- b. A control rod shall be considered inoperable if
 - (1) the rod cannot be moved by the CRDM, or
 - (2) the rod is misaligned from its bank by more than 12 steps for longer than 8 hours, or
 - (3) the rod drop time is not met.
- c. If a control rod cannot be moved by the drive mechanism, shutdown margin shall be increased by boron addition to compensate for the withdrawn worth of the inoperable rod.

*Any reference to part-length rods no longer applies after the part-length rods are removed from the reactor.

$$m_{\text{eff}} = \frac{m}{1 + \frac{1}{2} \frac{m}{m_0} \frac{v}{c}} \quad (1)$$

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