REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8202020343 DOC.DATE: 82/01/27 NOTARIZED: NO DOCKET #
FACIL:50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
AUTH.NAME AUTHOR AFFILIATION
UHRIG,R.E. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Advises of intent to conduct hot functional test on or about 820206,subj to intrepretations stated in encl safety evaluation.Tech Spec requirements that may be waived listed.

DISTRIBUTION CODE: A001S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
TITLE: General Distribution for after Issuance of Operating License

NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
ACTION:	ORB #1 BC	01	13	13				
INTERNAL:	ELD		1	0	IE	06	2	2
	NRR/DHFS DEPY08		1	1	NRR/DL DIR		1	1
	~~NRR/DL/ORAB~~		1	0	NRR/DSI/RAB		1	1
	REG FILE	04	1	1				
EXTERNAL:	ACRS	09	10	10	LPDR	03	1	1
	NRC PDR	02	1	1	NSIC	05	1	1
	NTIS		1	1				

TOTAL NUMBER OF COPIES REQUIRED: LTTR 35 ENCL 33

P.O. BOX 529100 MIAMI, FL 33152

FLORIDA POWER & LIGHT COMPANY

January 27, 1982
L-82-30

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4
Docket No. 50-250 & 50-251
Hot Functional Testing

As part of the Steam Generator Repair Program for Turkey Point Unit 3, we are planning to conduct a hot functional test in early February 1982. To conduct the test the Reactor Coolant System (RCS) is heated and pressurized to approximate normal operation conditions. Normally certain Technical Specifications would have to be met to raise the RCS to these conditions of temperature and pressure. However, because the fuel has been removed from the core, we have concluded that for the purposes of this test, certain limiting conditions of operation and surveillance requirements are not applicable to protect the health and safety of the public. This conclusion will also be applicable to Turkey Point Unit 4 under the same steam generator repair condition.

We have attached our evaluation which cites the specific sections of the Technical Specifications that are affected.

Based on our review we have determined that it is not necessary to apply the sections of the Technical Specifications discussed in the attachments during the hot functional test. Please be advised that it is our present intent to conduct the hot functional test on or about February 6, 1982, subject to the herein stated interpretations.

A listing of Technical Specification requirements that may be waived for hot functional testing is added, and has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power and Light Company Nuclear Review Board.

Following the successful completion of this test, we will again resume our normal compliance with these Technical Specification requirements.

Very truly yours,

Jack E. Vasseley for

Robert E. Uhrig
Vice President
Advanced Systems and Technology

A001
S 1/1

REU/PLP/cab

Attachments

SAFETY EVALUATION

Re: Turkey Point Units 3 & 4
Docket No. 50-250, 50-251
Hot Functional Testing

I. Introduction

This evaluation supports our Tech. Spec. interpretation when the fuel has been removed from the core and for the purpose of performing a "Hot Functional Test". This interpretation basically consists of expressing inapplicability of the "Limited Condition for Operation" and "Surveillance Requirements" of certain systems and/or components which are neither used nor needed when the reactor fuel has been removed.

II. Evaluation

(See Attached)

III. Conclusion

We have concluded, based on the considerations discussed above, that: (1) this interpretation does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in 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 concurrence to this interpretation will not be inimical to the common defense and security or to the health and safety of the public.

[illegible]

[illegible]

I [illegible]

[illegible]

[illegible]

[illegible]

III [illegible]

[illegible]

EVALUATION

For the purpose of performing a Hot Functional Test (HFT) with the fuel removed from the core, the following interpretations of our Technical Specification will be made:

A. LIMITING CONDITIONS FOR OPERATIONS

3.3 Containment

Since the fuel will be unloaded from the reactor core throughout the course of the HFT, the requirement to have containment integrity at other than cold shutdown conditions becomes unnecessary.

3.5 Instrumentation

For the purpose of the HFT, the requirements to maintain the minimum instrumentation operation conditions as described in Tables 3.5-1 through 3.5-5 are not needed. For this reason and under the conditions stipulated above, TS 3.0.1 does not apply to Tables 3.5-1 through 3.5-5. Also, the requirement to be in a condition with an average coolant temperature less than 350°F within 60 hours when outside the minimum channel operable requirements of Table 3.5-5 is not applicable. The surveillance requirements associated with the instrumentation listed in Tables 3.5-1 through 3.5-5 are also not applicable, although it is our intent to maintain pertinent test parameter instrumentation operability (i.e., pressurizer level, RCS pressure, and RCS temperature).

B. SURVEILLANCE REQUIREMENTS

4.1 Operational Safety review

Tables 4.1-1 Items 17A and 17B and Table 4.1-2 Items 2, 4, 10 and 14 are not applicable and need not be performed prior to heatup above 200°F.

4.5 Safety Injection

The system and component tests requirements prior to heatup above 200°F are considered not applicable for the purpose of performing a HFT with the fuel unloaded from the core since SI is not needed under these conditions.

4.6 Emergency Containment Cooling Systems

Similarly to TS 4.5 above, the requirements to perform system and component test prior to heatup above 200°F do not apply.

TESTING FOLLOWING STEAM GENERATOR REPAIR

For the purpose of conducting a hot functional test as required by the Steam Generator Repair Report, the Technical Specifications may be waived as follows:

A. Limiting Conditions for Operations

3.3.1.a. Containment Integrity	Not applicable with fuel removed from the core.
3.5 Instrumentation (pertinent test parameter instrumentation will be maintained operable)	"

B. Surveillance Requirements

4.1 Operational Safety Review Table 4.1-1 (items 17A and 17B) Table 4.1-2 (items 2, 4, 10 and 14)	"
4.5 Safety Injection	"
4.6 Emergency Containment Cooling Systems	"