REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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
WOODY, C. O. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
THOMPSON, H. L. Division of Pressurized Water Reactor Licensing - A (post 8

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, modifying Tech Spec limiting condition for operation for control room ventilation sys to allow implementation of mods to satisfy NUREG-0737, Item III. D. 3. 4. Fee paid.

DISTRIBUTION CODE: A046D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 1+2
TITLE: OR Submittal: TMI Action Plan Rgmt NUREG-0737 & NUREG-0660

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	IE/DEPER/EPB		3	3	NRR BWR ADTS		1	1
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FLORIDA POWER & LIGHT COMPANY

AUG 2 5 1986

L-86-332

Office of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Jr., Director
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thompson:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Control Room Ventilation

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) is submitting three signed originals and forty copies of a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41.

The proposed amendment modifies the Technical Specification Limiting Condition for Operation for the Control Room Ventilation System to allow implementation of the modifications required to satisfy NUREG-0737 Item III.D.3.4, Control Room Habitability concerns. FPL will begin work on the modifications within 90 days of the implementation date specified in the license amendment.

The proposed change is described below and shown on the accompanying technical specification pages.

Pages 3.4-6, 3.4-7 (added)

The technical specification for the control room ventilation system (T.S. 3.4.7) is revised to permit the system to be inoperable for up to 45 days to implement the NUREG-0737, Item III.D.3.4, Control Room Habitability modifications.

The proposed amendment has been reviewed and approved by the Turkey Point Plant Nuclear Safety Committee and the Florida Power and Light Company Nuclear Review Board.

In accordance with 10 CFR 50.9(b)(1), a copy of the proposed amendment is being forwarded to the State Designee for the State of Florida.

In accordance with 10 CFR 170.12(c), FPL Check No. 2143 for $150.00 is attached.

Rec'd w/ check

A046
1/1

TCG3/022/1

Attachment 1 provides an evaluation of the proposed action in light of the no significant hazards standards contained in 10 CFR 50.92.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/gp

Attachments

cc: Dr. J. Nelson Grace
Regional Administrator, Region II

Mr. Alan Schubert, Manager
Public Health Physicist
Dept. of Health & Rehabilitation Services
1323 Winewood Boulevard
Tallahassee, FL 32301

Harold F. Reis, Esq.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

C. O. Woody being first duly sworn, deposes and says:

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

That he has executed the foregoing document; that the statements made in this 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.

C. O. Woody

Subscribed and sworn to before me this
25 day of August, 1986.

Bernice M. Dalinis
NOTARY PUBLIC, in and for the County
of Dade, State of Florida

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP SEPT 18,1989
BONDED THRU GENERAL INS. UND.

My Commission expires:

ATTACHMENT I

SAFETY AND NO SIGNIFICANT HAZARDS EVALUATION

Description of Amendment Request:

The proposed amendment modifies the technical specification Limiting Condition for Operation (LCO) for the control room ventilation system to allow implementation of modifications required to satisfy NUREG-0737, control room habitability concerns. NUREG-0737 NRC Task Action Plan Item III.D.3.4, Control Room Habitability, required that licensees assure that control room operators will be adequately protected against the effects of accidental releases of toxic and radioactive gases, and that the nuclear power plant can be safely operated or shut down under design basis accident conditions (Criterion 19 - Control Room, of Appendix A, General Design Criteria for Nuclear Power Plants, to 10 CFR Part 50).

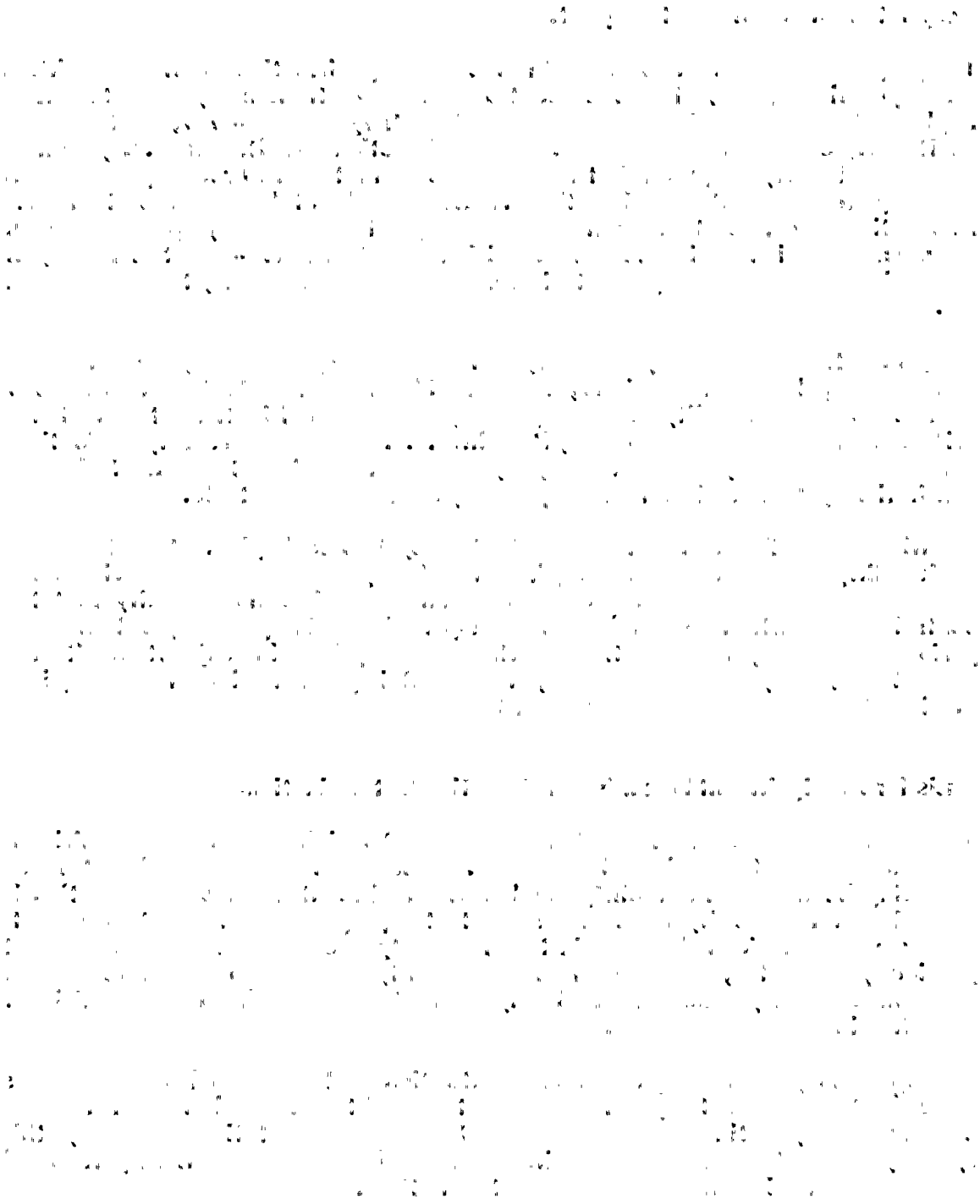
FPL, in letters dated July 9, 1981, June 9 and July 22, 1982, August 9 and November 3, 1983, and April 17, 1985 provided responses to the NUREG-0737 control room habitability concerns, and proposed modifications to meet the criteria identified in NUREG-0737, Item III.D.3.4. The NRC in safety evaluations dated November 25, 1983 and May 8, 1985 concluded that the control room ventilation system modifications proposed by FPL were acceptable.

Modification of the control room ventilation system to implement control room habitabililty requirements will require that the system be out of service for a period of up to 45 days. The current technical specifications specify that the control room ventilation system can be inoperable (during power operation) for a period of 3 1/2 days. A one time additional 45 day LCO in conjunction with the current 3 1/2 day LCO is necessary to permit implementation of the required modifications without forcing a dual unit outage.

Basis for No Significant Hazards Consideration Determination:

The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for the facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

The operability of the control room ventilation system (see Figure 1) ensures that: (1) the ambient temperature does not exceed the allowable temperature for continuous-duty rating for the equipment and instrumentation cooled by this system, and (2) the control room will remain habitable for operations personnnel during and following all credible accident conditions.

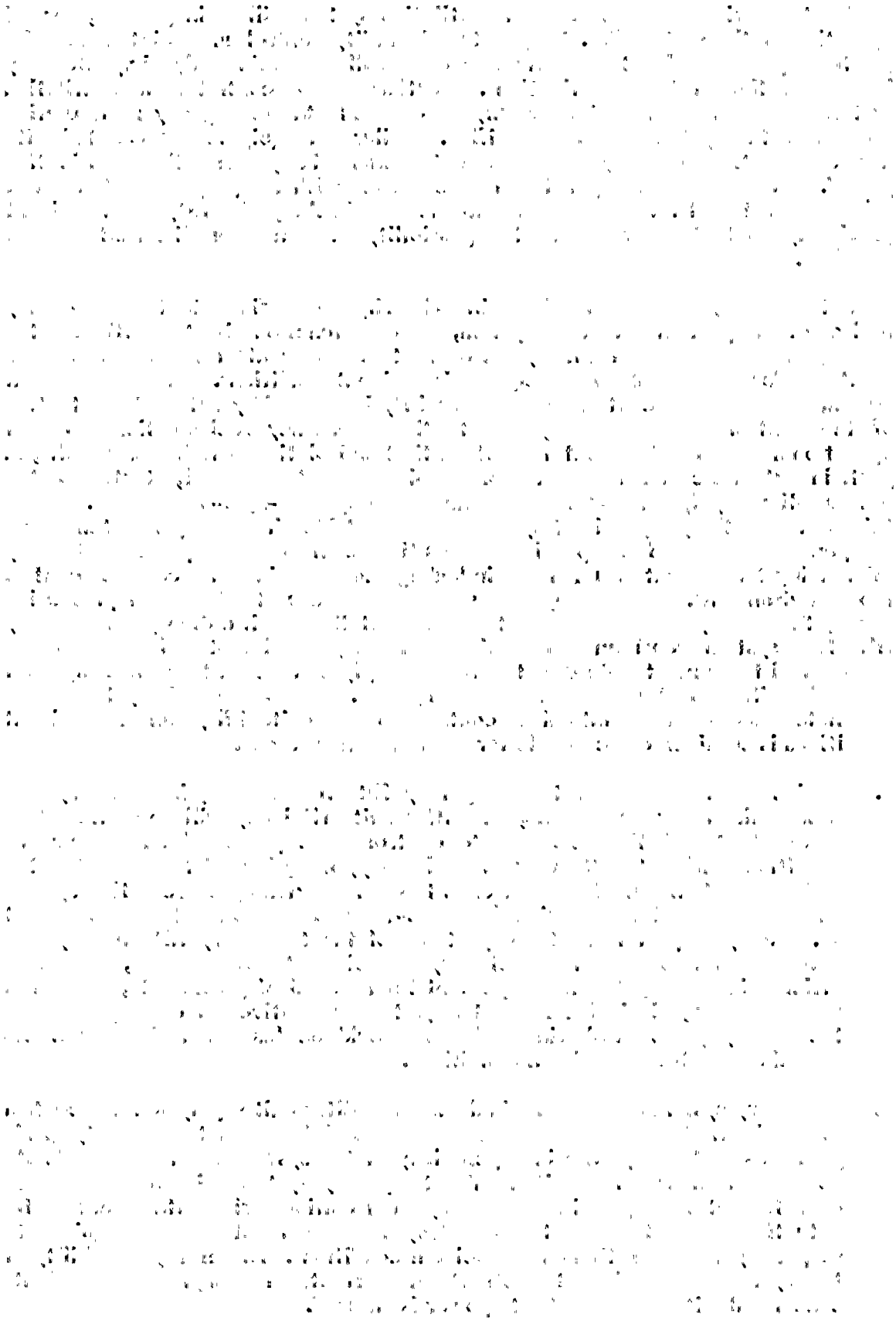


During the period the control room ventilation system will be inoperable, normal operation of the system (i.e. temperature/humidity control and maintenance of a positive pressure in the control room) will be minimally impacted by implementation of the modifications. Portions of the control room ventilation system duct work will be temporarily sealed while the emergency recirculation portion of the system is being modified. Failure of equipment associated with normal operation of the system would not be more likely during the modification period. Therefore, plant operation in accordance with the proposed extension of the LCO would not involve a significant increase in the probability of an accident previously evaluated, or create the possibility of a new or different kind of accident.

As noted above, the modification will primarily be confined to the emergency recirculation portion of the system, whose function is to mitigate the consequences of an accident by ensuring that the control room will remain habitable during and following design basis accident conditions. Under the current design, post-accident control room habitability is ensured by automatic actuation of the control room HVAC system to the emergency recirculation mode of operation in response to a containment ventilation isolation signal. This results, in part, in automatic closure of the normal air intake damper D-1, starting of the recirculation supply fan V-29, and opening of dampers D-2, D-3 and D-11. Under this confirguration, approximately 250 cfm of outside air makeup is obtained via dampers D-2 or D-3 to provide a positive control room pressure thereby minimizing the amount of unfiltered in leakage and ensuring an acceptable control room environment. Therefore, to ensure a commensurate degree of protection during the 45 day period required to implement the modifications, a temporary filtration system consisting of a high efficiency particulate air (HEPA) and charcoal filter unit, together with an air supply fan and interconnecting duct assembly will be installed as shown on Figure 2. The use of this system as an alternate means of maintaining control room habitabililty under accident conditions is considered acceptable for the following reasons:

1. Design requirements for the temporary filtration system, including system sizing, air flow requirements, and filter unit efficiency will be sufficient to ensure that radiation exposure to control room personnel under accident conditions will be less than 5 rem whole body, or equivalent to any part of the body, consistent with the requirements for the existing recirculation system and General Design Criterion 19 (GDC-19) of Appendix A to 10 CFR Part 50. Analyses performed to support use of the temporary filtration system have shown that for an expected system flowrate of 800 cfm, and filter efficiencies of 99, 95, and 95 percent for removal of particulate, elemental iodine and organic iodine respectively, the cumulative whole body dose for the 30-day period following a LOCA would be less than GDC-19 limits assuming worst-case accident conditions.

2. Necessary system components including the filter unit supply fan and control room air intake damper D-1, will be powered from existing safety-grade plant busses thereby ensuring operability of the system under loss of offsite power conditions. In addition, the temporary system will be designed to operate continuously during the 45-day modification period without automatic actuation or control functions. Also, no manual actions are required to support system operation under accident conditions. Therefore, operability of the system as required to mitigate the effects of design basis accidents concurrent with a loss of offsite power is ensured.



3. In the unlikely event of a filter unit failure during the 45-day modification period, a second, duplicate unit and associated supply fan will be available onsite and ready for installation to restore system operation. Should the temporary system be rendered inoperable as a result of equipment failure, system testing, or completion of recirculation system modifications, existing Technical Specification action statements for inoperability of the control room ventilation system will apply thereby ensuring safe plant operation in accordance with existing Technical Specification requirements.

4. Functional testing of the temporary system including the backup filter unit will be performed to demonstrate operability prior to use and after 720 hours of operation. Testing requirements will be consistent with current Technical Specification surveillance requirements for the existing recirculation system and will include appropriate visual inspections, leak tests, and airflow distribution tests.

5. Installation of the temporary system will be performed in a controlled manner in accordance with existing Turkey Point procedures governing the implementation of plant design changes and modifications. Where necessary, appropriate quality control witness and inspection requirements will be specified by engineering to ensure the acceptablity of the completed installation.

6. Operator training will be conducted and temporary procedure changes implemented as necessary to support safe and reliable operation of the temporary filtration system. However, as noted in item 2 above, the system will be designed to operate continuously during the modification period and require no manual actions to support operation under accident conditions. Therefore, necessary training and procedure changes will be minimal. Upon completion of the required system modifications and prior to removal of the temporary system from service, necessary procedure changes will be implemented to support use of the permanent control room HVAC system as shown on Figure 3.

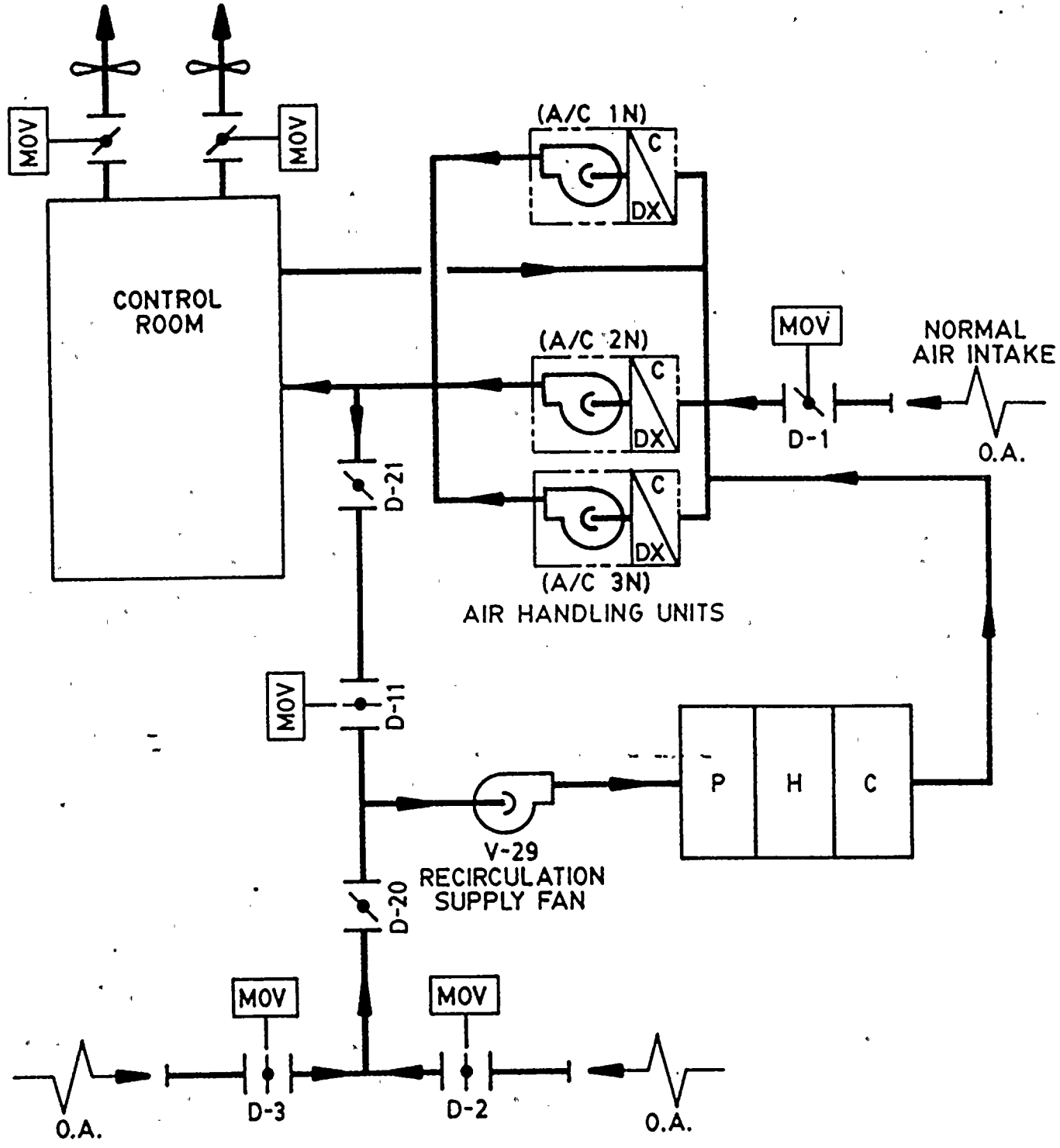
On the basis of the preceding discussions, it can be concluded that use of the temporary filtration system to support plant operation in accordance with the proposed Technical Specification Amendment will not involve a significant increase in the consequences of any accident previously evaluated, or involve a significant reduction in the margin of safety.

In addition, the Commission has provided guidance for the application of the criteria in 10 CFR Part 50.92 (as specified above), by providing examples of amendments that are not likely to involve a signficant hazards consideration. The proposed Technical Specification change is similar to the format and intent of example (vi) of the Examples of Amendments That Are Not Considered Likely to Involve Significant Hazards Considerations as presented in the Federal Register Notice of April 6, 1983:

> Example (vi): "A change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method."

Therefore, on the basis of the above discussion, operation of Turkey Point Units 3 and 4 in accordance with the proposed amendments would pose no threat to the public health and welfare, and would not involve a significant hazards consideration.

EXISTING
CONTROL ROOM HVAC SYSTEM

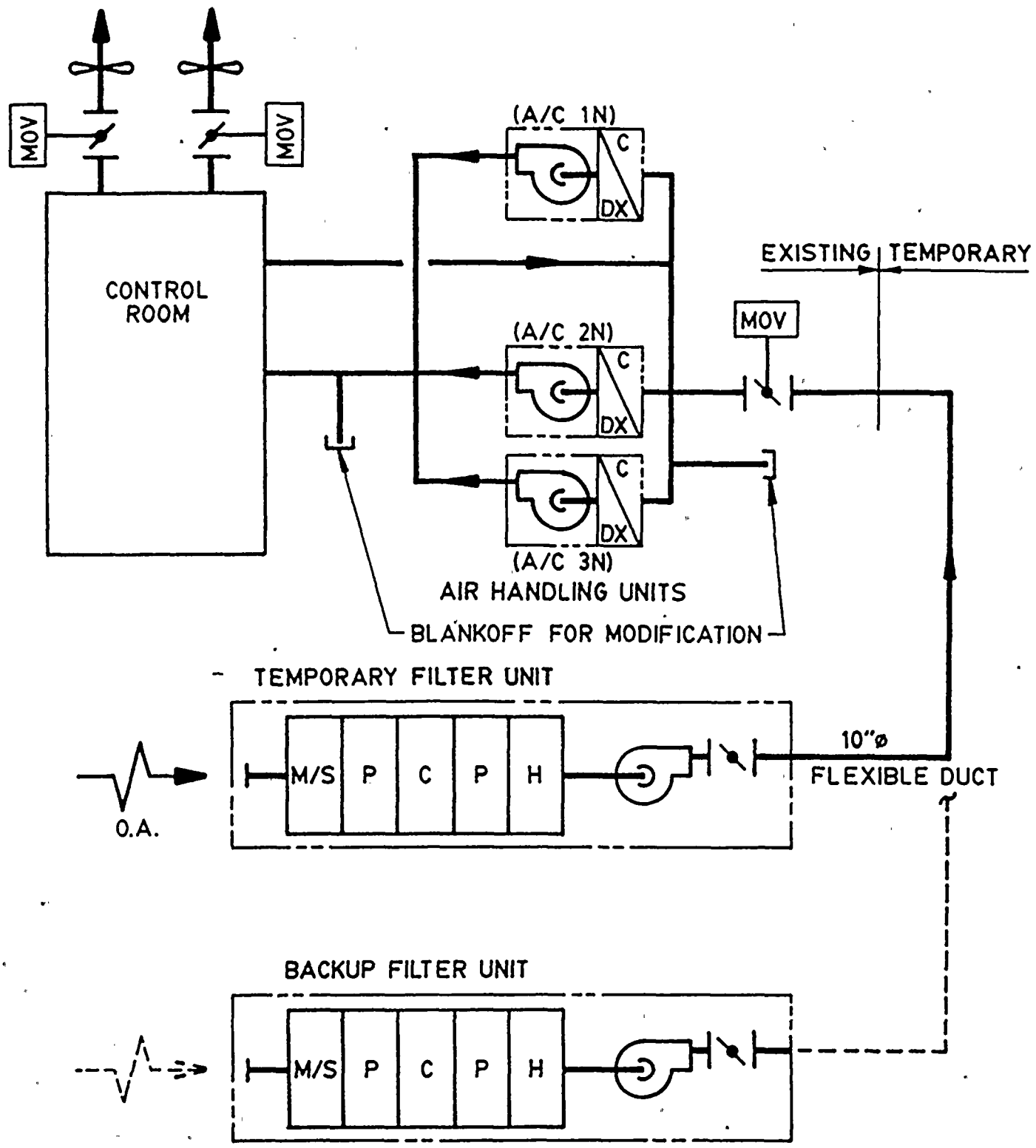


LEGEND

MOV - MOTOR OPERATED VALVE
O.A. - OUTSIDE AIR
P - PRE-FILTER
H - HEPA FILTER
C - CHARCOAL ADSORBER

FIGURE 1

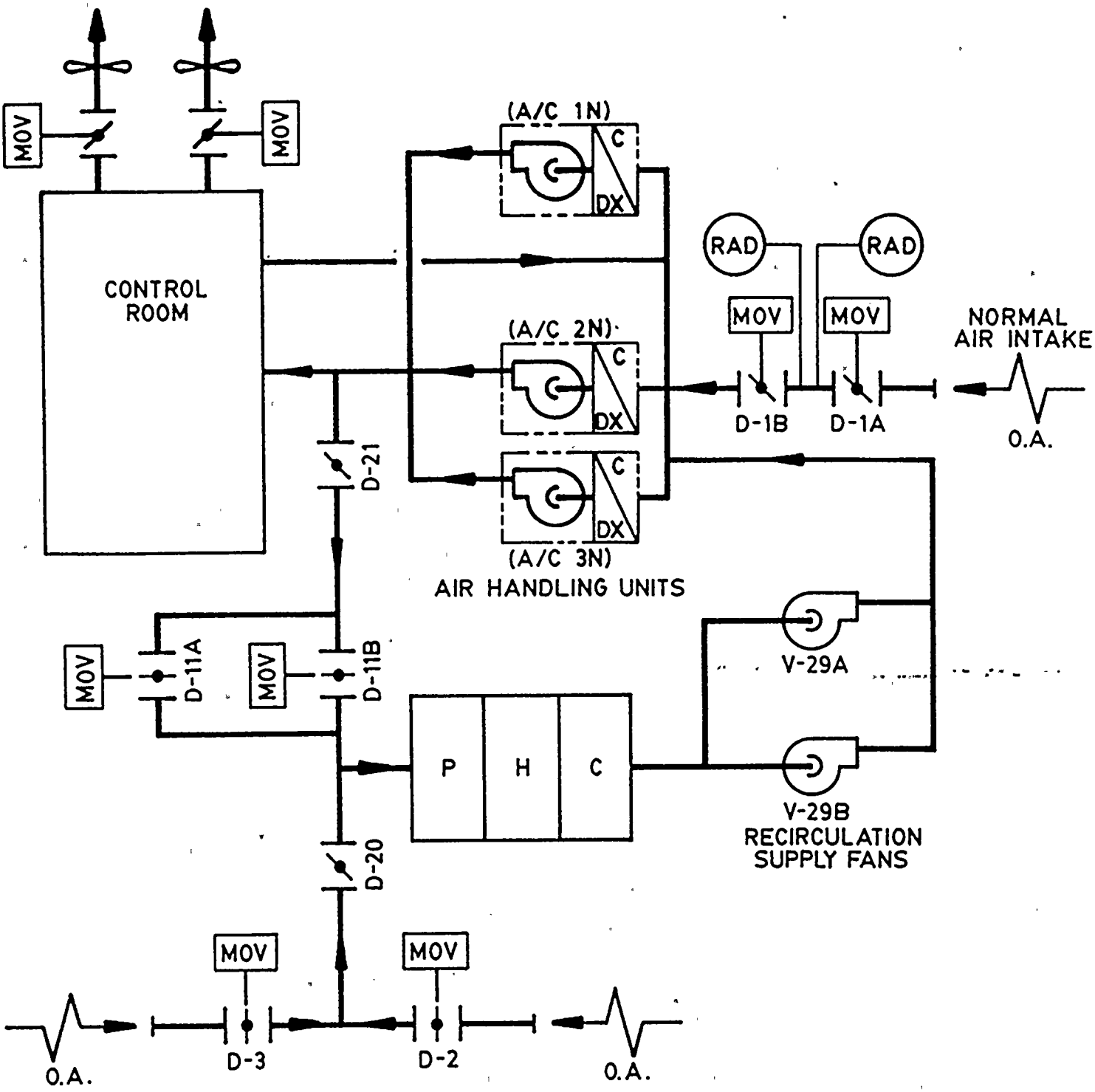
TEMPORARY
CONTROL ROOM HVAC SYSTEM



LEGEND
MOV - MOTOR OPERATED VALVE
O.A. - OUTSIDE AIR
P - PRE-FILTER
H - HEPA FILTER
C - CHARCOAL ADSORBER
M/S - MOISTURE SEPARATOR

FIGURE 2

PERMANENT
CONTROL ROOM HVAC SYSTEM



LEGEND
MOV -MOTOR OPERATED VALVE
O.A. -OUTSIDE AIR
P -PRE-FILTER
H -HEPA FILTER
C -CHARCOAL ADSORBER
RAD-RADIATION MONITOR DETECTOR

FIGURE 3

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. FACILITY OPERATING LICENSE NO. DPR-31

AMENDMENT NO. FACILITY OPERATING LICENSE NO. DPR-41

DOCKET NO. 50-250 AND 50-251

Revise Appendix A as follows:

Remove Pages	Insert Pages
3.4-6	3.4-6
—	3.4-7