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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 AUTHORITY AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, taking current requirement for safety injection accumulators & consolidating requirements into one limiting condition for operation section & one surveillance section. Fee paid.

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 \$150.00
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FEBRUARY 3 1988

L-88-50

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Safety Injection Accumulators

By letter dated September 29, 1986 (FPL letter L-86-393) Florida Power & Light Company (FPL) submitted a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 to upgrade the current plant Technical Specifications and include, within limitations, the guidance of NUREG-0452, Standard Technical Specifications (STS) for Westinghouse Pressurized Water Reactors.

The proposed changes remove the custom versions of the limiting condition for operation and surveillance requirements for the accumulators from Technical Specifications 3.4 and 4.1 and place them in a separate section in the STS format with additional STS requirements. FPL requests that these changes be reviewed and issued independent of the technical specification upgrade review effort.

This separate issuance will provide the collective action discussed in our response to Inspection Report 87-35 to preclude further recurrence of operating problems associated with the chemical sampling of the accumulators.

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an FPL Group company

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U. S. Nuclear Regulatory Commission
L-88-50
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The proposed specification and supporting documentation, are attached.

In accordance with 10 CFR 50.91(b)(1), a copy of this proposed license amendment is being forwarded to the State Designee for the State of Florida.

In accordance with 10 CFR 170.12(c), FPL Check No. 7153 for \$150 is attached as remittance for the licensee amendment application fee.

The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

If there are any questions, please call us.

Very truly yours,



C. O. Woody
Executive Vice President

COW/PLP/gp

Attachments

cc: Dr. J. Nelson Grace, Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. Jacob Nash, Florida Dept. of Health and
Rehabilitative Services

PLP/004.PLA

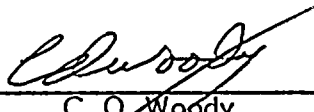
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

/

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

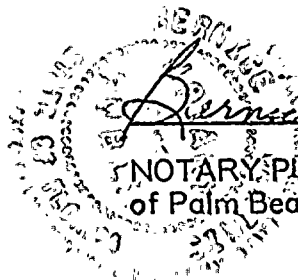
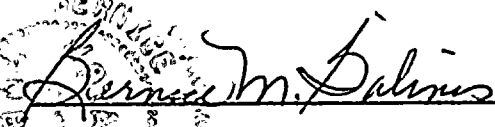
That he is Executive Vice President of Florida Power & Light Company, the Licensee herein;

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
3rd day of February, 1988.

NOTARY PUBLIC, in and for the County
of Palm Beach, State of Florida

My Commission expires: _____

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



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TURKEY POINT UNITS 3 AND 4
PROPOSED LICENSE AMENDMENT

PLA-051

TITLE: ACCUMULATORS

DESCRIPTION:

This proposed amendment to the Turkey Point Technical Specifications (TS) takes the current requirement for the safety injection accumulators from several TS sections and consolidates the requirements into one limiting condition for operation (LCO) section and one surveillance section. This proposed change has been drafted following the guidelines of NUREG 0452, Standardized Technical Specifications for Westinghouse Pressurized Water Reactors (WSTS) and the proposed Upgraded Technical Specifications submitted to the NRC on September 30, 1986 as a part of the Performance Enhancement Program (PEP). The changes are as follows:

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The Table of Contents has been revised to reflect the changes described below.

Pages 1-7, 1-8, 1-9

These pages of definitions have been consolidated to allow the addition of a definition for the ANALOG CHANNEL OPERATIONAL TEST.

TABLE 1.1

The Average Coolant Temperature requirement for Mode 5 (cold shutdown) has been revised to correct a typographical error. This requirement has been revised to read less than or equal to 200 F.

Pages 3.4-1, 3.4-2 and 3.4-2.a

The requirements for the accumulators have been deleted and the other sections renumbered as required.

A new TS section (3.4.1.f) has been added describing the LCO and action requirements for the accumulators.

The operability requirements were revised as follows:

The contained borated water volume was converted from cu. ft. to gallons (875-891 cu. ft. vs 6545-6665 gallons) to reflect installed instrumentation; upper bounds for boron concentration (2350 ppm) and nitrogen cover pressure (675psig) were added. The revised LCO is consistent with the accumulator design parameters specified in the FSAR (Table 6.2-4).

The LCO applicability was extended to include Mode 3 (with pressurizer pressure above 1000 psig). This is more conservative than the current TS requirements which specify that the reactor is not to be made critical except, for low power physics tests, unless the accumulators are operable.

The action requirements were revised using the WSTS as guidance. The proposed action statements for one accumulator inoperable, except as a result of a closed isolation valve, and one accumulator inoperable due to the isolation valve being closed, are more conservative than the current TS requirements in that they require that the plant be placed in a mode where the capability of the accumulators is not required (i.e. pressurizer pressure less than 1000 psig) in a shorter time than required by the current TS. The current TS would allow the plant to be kept in hot shutdown (reactor subcritical and with Tavg above 540 F) for a maximum of 48 hours before going to cold shutdown. Plant procedures for going from hot standby to cold shutdown require that the accumulators be isolated from the RCS when the pressurizer pressure is between 1000 psig and 700 psig. Since the accumulators are isolated and no longer required, there is no requirement to take the plant all the way to cold shutdown as specified in the current TS.

Table 4.1-1 Sheet 2, Table 4.1-2 Sheet 2 and Page 4.5-2

The surveillance requirements for the accumulators have been removed from these TS sections and other sections have been renumbered as required.

Page 4.5-3

A new section has been added to consolidate the accumulator surveillance requirements. In addition to the current requirements, a once per shift surveillance to verify that the isolation valves are open and to verify that the power supply to the isolation valves is disconnected by a locked open breaker was added. Also a monthly ANALOG CHANNEL OPERATIONAL TEST has been added for the level and pressure channels.

Pages B3.4-1 and B3.4-2

The previous basis section for the accumulators has been deleted and a new basis section has been added. The new basis sections conforms to the WSTS format and the Turkey Point Final Safety Analysis Report.

Page B4.5-1

The references to accumulators has been deleted because the basis section added to B3.4 adequately describes the basis for the accumulator TS requirements.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The standards used to arrive at a proposed determination that the changes described above involve no significant hazards consideration are included in 10CFR50.92. The regulations state that if operation of the facility in accordance with the proposed amendment could 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, then a no significant hazards determination can be made.

Operation of Turkey Point Units 3 and 4 in accordance with the proposed amendments would not:

(1) and (2) involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes are either administrative (i.e., consolidation of accumulator LCO, action and surveillance requirements in a separate section, conversion of the borated water volume from cu. ft. to gallons), or provide requirements that are as restrictive or more restrictive than the current requirements (i.e., upper bounds on boron concentration and nitrogen cover pressure, broader mode applicability, action requirements requiring the plant to be placed in a mode where the capability of the accumulators is not required in a shorter time period, and additional surveillance requirements). They are consistent with the design basis, and do not affect the assumptions used for accumulator injection in the safety analyses. The action required in the event of an inoperable accumulator is to place the plant in a mode where capability of the accumulators is not required,, which is consistent with the intent of the current TS.

(3) involve a significant reduction in a margin of safety.

The action requirement to reduce pressure to less than 1000 psig rather than go to cold shutdown, as required by the current TS, would not result in a reduction in a margin of safety since the plant would similarly be placed in a mode where the accumulators are not required to be operable.

In addition, the Commission has provided guidance concerning the application of standards for determination whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve a significant hazards consideration. Example (1) relates to a purely administrative change to Technical Specifications: correction of an error, or a change in nomenclature. Example (ii) relates to a change that constitutes an additional

limitation, restriction, or control not presently included in the Technical Specifications: for example, a more stringent surveillance requirement.

(1) The proposed change as described above is similar to example (i) of 48 FR 14870 in that it is an administrative change which consolidates current requirements for the accumulators into a technical specification format consistent with the Standard Technical Specifications, and converts the required borated water volume from cu. ft. to gallons.

(2) The proposed change as described above is similar to example (ii) of 48 FR 14870 in that it provides additional restrictions in the form of mode applicability requirements, upper bounds on the accumulator boron concentration and nitrogen cover pressure, shorter required action time limits, and additional surveillance requirements.

Based on the above considerations, the changes included in the proposed amendment are not considered to involve a significant hazards consideration as defined in 10CFR50.92. Further, there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes.