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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
 CONWAY,W.F. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

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SUBJECT: Advises that util will revise current Tech Specs using STS
 for guidance rather than submit amends to procedures.

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FEBRUARY 26 1988

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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
Technical Specification Revision

On January 28, 1988, FPL met with members of the NRC Staff to discuss concerns as outlined in an NRC letter dated January 15, 1988 regarding the use by Turkey Point Plant operators of the "Interim Technical Specifications (ITS)." The ITS were issued internally by FPL to reflect the more conservative of the requirements in the current approved Technical Specifications (CTS) and the proposed Revised Technical Specifications (RTS) submitted to the NRC by FPL on September 29, 1986 and November 28, 1986.

As part of the Turkey Point Performance Enhancement Program (PEP), FPL committed in April 1984 to review, and implement where appropriate, the philosophy and guidance of the Standard Technical Specifications (STS), NUREG-0452, in the development of new procedures, and to incorporate (within certain limitations) the requirements of the STS in future proposed amendments to the CTS. FPL subsequently decided to completely revise the CTS using the STS for guidance, rather than submit individual amendments.

The ITS were developed as part of Phase II of PEP Project 10, the Technical Specification Upgrade Project for trial implementation of the RTS requirements, within the limitations of the CTS, until the RTS were issued. The ITS were placed in the control room to allow the operators to:

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- o become accustomed to the change of format (i.e. limiting conditions for operation (LCO), applicability, action statements, and surveillance requirements),
- o become familiar with the surveillance requirements that were being added to the plant procedures,
- o compare the CTS LCO action statements with the proposed RTS action statements as shown in the ITS (and follow the most restrictive), and
- o to identify changes that would need to be made prior to approval of the RTS by the NRC.

Explicit guidance in the form of a training brief was provided to the operators regarding use of the ITS. That guidance specifically stated that the CTS governed operation of the plant. When an LCO could not be met, the operators were to compare the CTS and ITS, and adhere to the ITS action statement if it was as restrictive or more restrictive than the CTS requirement. If the ITS action requirement was so restrictive that it jeopardized the unit's operation (i.e. required an immediate unit shutdown vs. a 24 hour shutdown), the operators were to contact the Operations Supervisor or the Operations Superintendent for direction. If an ITS requirement was found to be less restrictive than a CTS requirement, it was not to be followed, and the Operations Supervisor or Operations Superintendent were to be informed.

Since the ITS were developed to reflect as restrictive or more restrictive requirements than the CTS, FPL has no safety concerns regarding their use as a guidance document in implementing the requirements of the revised plant operating procedures. To remove any potential for confusion on the part of the operators regarding the use of the ITS vs. CTS in making interpretations and judgments regarding compliance, a formal plant procedure is being developed incorporating the ITS as an attachment and providing guidance on its use. This procedure is scheduled to be issued by April 1, 1988.

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In the interest of minimizing the time to issuance of the RTS, FPL will continue to support any meetings with your staff necessary to complete the RTS review. If you have any further questions regarding this matter, please call us.

Very truly yours,



W. F. Conway
Senior Vice President - Nuclear

WFC/TCG/dh

cc: Steven A. Varga, Director, Division of Reactor Projects
I/II, NRR
Dr. J. Nelson Grace, Regional Administrator, Region II,
USNRC
D. R. Brewer, NRC Senior Resident Inspector, Turkey Point
Plant

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