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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41 revising  
 Tech Spec 3.4.4, "Component Cooling Water Sys."

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APRIL 04 1988  
L-88-157

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 Emergency License Amendment  
Component Cooling Water System

In accordance with 10 CFR 50.90, Florida Power & Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41, Turkey Point Units 3 and 4 Technical Specifications, be amended on an emergency basis to revise Technical Specification 3.4.4, Component Cooling Water System. Specifically, the change will revise Technical Specification 5.4.4 to (1) require applicability in Modes 1, 2, 3, and 4, (2) allow one CCW heat exchanger to be out of service for 72 hours, (3) revise the action requirements to be consistent with the operational modes specified in Table 1.1, and (4) reduce the time allowed to go from hot standby to cold shutdown to be consistent with the STS. In addition, the format would be revised to be consistent with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors (STS). This amendment request is needed by about April 15, 1988 to prevent a midsummer shutdown of Unit 4.

As described in FPL letter L-87-479 dated November 18, 1987, FPL has modified the Unit 3 CCW heat exchangers to provide an on-line mechanical tube cleaning capability. FPL had planned to modify the Unit 4 heat exchangers during the Unit 4 refueling outage scheduled for late 1988 or early 1989. FPL would like to implement those modifications on Unit 4 prior to the summer months to ensure acceptable heat exchanger performance without the need for extensive repetitive heat exchanger cleaning. Installation of the tube cleaning system is expected to be accomplished under the provisions of 10 CFR 50.59.

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an FPL Group company

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10 CFR 50.91(a)(5) provides a discussion of the actions a licensee is to take to request an amendment when an emergency situation exists. This paragraph allows the NRC to issue an amendment involving no significant hazards considerations without prior notice and opportunity for a hearing or for public comment. This type of issuance can be used to prevent derating or shutdown of a nuclear power plant provided the licensee explains why the emergency situation occurred and why the licensee could not avoid this situation.

Based on our experience with the CCW heat exchangers during the summer of 1987, we have determined as stated above that the best course of action is to install the continuous tube cleaning system on Unit 4 before this summer. This installation process will require a 72 hour period with a heat exchanger out of service for installation of a spool piece prior to putting the heat exchanger back in service. After approximately a two month period for system construction, additional 72 hour out of service periods will be required to put the system into operation.

If this work can start by April 15, 1988, the final out of service period of the installation would fall in mid June. For this schedule to be successful, the remaining two inservice heat exchangers must be cleaned sufficiently to ensure that design basis heat loads can be carried for the out of service period. The time required to process a regular technical specification amendment request would drive the final out of service period for installation into mid July or later. We cannot ensure that the two inservice heat exchangers could support installation at this time period based on our estimation of cooling canal temperatures. This would require shutdown of the unit to install the system.

Installation of the system during the April-June time frame will also allow completion of the optimization testing before next summer.

FPL has maintained a dialogue with the NRC Staff regarding the CCW heat exchangers issue. Based on the complexity of the issue it is our judgement that FPL has taken prompt and responsible action to resolve the problem. It should be clear that FPL has not created this emergency in order to abuse the emergency provisions of the license amendment process.

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It has been determined that the proposed amendment does not involve a significant hazards consideration pursuant to 10 CFR 50.92. A description of the amendment request and the basis for a no significant hazards consideration determination is provided in Attachment 1. The proposed revised technical specification changes are shown on the pages included in Attachment 2.


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

In accordance with 10 CFR 170.12(c), FPL Check No. 7396 for \$150 is attached.

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

Should there be any questions on this request, please contact us.

Very truly yours,

  
W. F. Conway  
Acting Group Vice President  
Nuclear Energy

WFC/TCG/gp

Attachments

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

TCG.CCW

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

W. F. Conway being first duly sworn, deposes and says:

That he is an Acting 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.

W. F. Conway  
W. F. Conway

Subscribed and sworn to before me this

4 day of April, 1988.

Roberta S. Economy  
NOTARY PUBLIC, in and for the County  
of Palm Beach, State of Florida

My Commission expires:

Notary Public, State of Florida  
My Commission Expires June 1, 1989  
Bonded Thru Troy Fain - Insurance, Inc.

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ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUEST AND

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION



Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed Emergency License Amendment  
Component Cooling Water System

Description of Amendment Request:

The proposed license amendment would modify Technical Specification (TS) 3.4.4, Component Cooling Water System (CCW), to revise the format to be consistent with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors (STS), require applicability in Modes 1, 2, 3, and 4, allow one CCW heat exchanger to be out of service for 72 hours, revise the action requirements to be consistent with the operational modes specified in Table 1.1, and reduce the time allowed to go from hot standby to cold shutdown.

In accordance with the STS, the LCO, mode applicability, and action requirements in the event the LCO cannot be met would be explicitly stated. FPL had committed to upgrade to the STS format whenever changes are made to the current TS.

TS 3.4.4 currently specifies that the reactor not be made critical, except for low power physics tests, unless the CCW system is operable. The proposed change would require that the CCW system be operable in Modes 1 through 4 with no exceptions. This is consistent with the applicability requirements in the STS, and is more restrictive than allowed by the current TS.

The allowed out of service time for one CCW heat exchanger would be extended to 72 hours from 24 hours. The CCW system has three CCW heat exchangers. Two of the three heat exchangers are capable of removing 100 percent of the design basis heat loads from the engineered safety feature systems during an accident. Therefore, even with one heat exchanger out-of-service, the CCW system is still capable of performing its design function. The probability of failure of one of the two operable heat exchangers if postulated during the additional 48 hours one heat exchanger is out-of-service is very small. Additionally, industry guidance states that the probability of a passive failure of this type is considered sufficiently small that it need not be considered in addition to an initiating failure in application of the single failure criterion to assure safety of a nuclear power plant (SECY 77-439, NRC Information Paper on Single Failure Criterion). The conditions under which a single failure of a passive component in a fluid system should be considered in designing the system against a single failure are under development by the NRC (10 CFR 50, Appendix A, General Design Criteria for Nuclear Power Plants). The CCW system is designed to accommodate single active failures.



The proposed change does not impact that capability. Heat exchanger operability is closely monitored by a surveillance program which considers a number of factors such as flow rate, intake cooling water inlet temperature, and heat exchanger cleanliness.

The action requirements would be revised to place the unit in hot standby versus hot shutdown if the component(s) cannot be restored to an operable status in the time specified in the TS. This interpretation was placed into effect when the NRC issued Facility Operating License Amendments 114 and 108 on June 27, 1985. This will place the TS action requirements in conformance with Table 1.1, Operational Modes, and is consistent with the STS. The time allowed to go from hot standby to cold shutdown would be reduced to 30 hours to be consistent with the STS.

An ACTION statement would be added providing guidance if the LCO regarding the valves, interlocks, and piping associated with the CCW pumps and heat exchangers could not be met. This is not specifically stated in the current TS.

#### 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 new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

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

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change introduces no new mode of operation nor does it involve a physical modification to the plant. The proposed increase in allowed out of service time would not invalidate the assumptions used in the accident analysis regarding CCW system capability, or affect the ability of the two operable heat exchangers to remove 100 percent of the design basis accident heat loads. CCW heat exchanger operability is determined by a surveillance program which considers a number of factors including flow rates, intake cooling water inlet temperature, and heat exchanger tube cleanliness. The

probability of a passive failure of one of the two operable heat exchangers during the 72 hours one heat exchanger is out of service is sufficiently small that operation with the heat exchanger out of service will not involve a significant increase in the probability or consequences of an accident previously analyzed.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated, since no new mode of operation or physical modification to the plant is involved in this specific change.
- (3) Involve a significant reduction in a margin of safety. The basis for the TS states that one pump and two heat exchangers meet the requirements of the safety analysis. With one heat exchanger out of service, the two operable heat exchangers are capable of removing the design basis accident heat loads. CCW heat exchanger operability is determined by a surveillance program which considers a number of factors including flow rates, intake cooling water inlet temperature, and heat exchanger tube cleanliness.

In addition, the Commission has provided guidance for the application of the criteria in 10 CFR 50.92 specified above by providing examples of changes that are not likely to involve a significant hazards consideration (50 FR 7751).

Example (i): A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

Example (ii): A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g. a more stringent surveillance requirement.

The reformatting to be consistent with the STS is an administrative change and is similar to example (i). The requirement that the CCW system be operable in Modes 1 through 4, and the revised action statements are more restrictive requirements, and are similar to example (ii).

Therefore, operation of the facility in accordance with the proposed amendment would pose no threat to the public health and safety, and would not involve a significant hazards consideration.

ATTACHMENT TO LICENSE AMENDMENT

TURKEY POINT UNITS 3 AND 4  
DOCKET NOS. 50-250 AND 50-251

Marked up Technical Specification Pages:

3.4-4  
3.4-4a (added)  
3.4-5