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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: Application for amends to Licenses DPR-31 & DPR-41, incorporating revised heatup & cooldown limit curves.

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FPL

SEPTEMBER 2 1 1988

L-88-424

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
Pressure/Temperature Limits

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 be amended to modify the Turkey Point Units 3 and 4 Technical Specifications (TS) to incorporate revised heatup and cooldown limit curves applicable up to 20 effective full power years (EFPY) of service life. The curves currently in the TS are applicable up to 10 EFPY. Turkey Point Unit 3 will reach 10 EFPY on October 28, 1988 at the earliest. Turkey Point Unit 4 is projected to reach 10 EFPY on May 11, 1989 at the earliest. The proposed amendment reformats the existing requirements in TS 3.1.2 to explicitly state the limiting conditions for operation, applicability, and action requirements, consistent with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors.

Since the pressure/temperature limit curves were prepared using the recently issued Regulatory Guide 1.99 Rev.2, this proposed amendment also satisfies the requirements of Generic Letter 88-11, NRC Position on Radiation Embrittlement of Reactor Vessel Materials and Its Impact on Plant Operations, dated July 12, 1988.

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#9465

FPL has reviewed the current cold overpressure mitigation system (PORV) setpoint and its associated bases in conjunction with the revised heatup and cooldown limit curves, and determined that the current setpoint of 415 psig is still acceptable assuming a valve stroke time of 2.0 seconds (mass input) and 3.0 seconds (heat input) (NRC Safety Evaluation, dated March 14, 1980, supporting issuance of License Amendments 55/47). As noted in NRC Inspection Report 50-250/88-14 and 50-251/88-14 dated July 29, 1988, and in FPL letter L-88-420 dated September 16, 1988, requesting discretionary enforcement to enable continued operation with the cold overpressure mitigation system not fully meeting the technical specification basis, FPL is evaluating the basis for selecting maximum stroke times for the PORVs. Should that review indicate that a setpoint change is necessary, FPL will submit a separate amendment request.

FPL has 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 determination is provided in Attachment 1. The proposed revised technical specification change is 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 for the State of Florida.

In accordance with 10 CFR 170.12(c), FPL Check No. 9465 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
Senior Vice President - Nuclear

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

TCGPTL.PLA

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

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

That he is Senior Vice President - Nuclear, of Florida Power and 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
21 day of September, 1988.

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

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

My Commission expires

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 License Amendment
Pressure/Temperature Limits

Description of Amendment Request:

TS 3.1.2 specifies the pressure and temperature limits for the reactor coolant system and pressurizer to be met during heatup, cooldown, criticality, and inservice leak and hydrostatic testing. The pressure and temperature limit curves currently in the TS are applicable up to 10 effective full power years (EFPY). Turkey Point Unit 3 will reach 10 EFPY on October 28, 1988 at the earliest. Turkey Point Unit 4 is projected to reach 10 EFPY on May 11, 1989 at the earliest.

The proposed change would incorporate revised pressure and temperature limit curves applicable up to 20 EFPY. Figures 3.1-1a, 3.1-1b and 3.1-1c would be applicable to both Units 3 and 4 and would replace Figures 3.1-1a through 3.1-1d for Unit 3 and 3.1-1a, 3.1-1b, 3.1-2c and 3.1-2d for Unit 4. The proposed change would also revise the current requirements to explicitly state the limiting conditions for operation, applicability, and action requirements to be consistent with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors. The Bases pages would also be revised to reflect the revised curves. The basis for the revised pressure and temperature limit curves is included in the attached Westinghouse report, "Heatup and Cooldown Limit Curves for Normal Operation," August 1988. The curves were developed using the guidance in Regulatory Guide 1.99, "Radiation Embrittlement of Reactor Vessel Materials," Revision 2, dated May 1988.

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.

(1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The pressure/temperature (P/T) limit curves in the Technical Specifications are conservatively generated in accordance with the fracture toughness requirements of 10 CFR 50, Appendix G as supplemented by Appendix G of Section III of the ASME Boiler and Pressure Vessel Code. The RT_{NDT} values for the revised curves are based on Regulatory Guide 1.99, Revision 2, dated May 1988, as discussed in Westinghouse Electric Corporation Report titled "Reactor Vessel Heatup and Cooldown Limit Curves for Normal Operation." The analysis of reactor vessel material irradiation surveillance specimen revised curves in conjunction with the surveillance specimen program ensures that the reactor coolant pressure boundary will behave in a non-brittle manner and that the possibility of rapidly propagating fracture is minimized.

The revised pressure/temperature limit curves do not represent a significant change in the configuration or operation of the plant and thus do not involve an increase in either the probability or the consequences of accidents previously evaluated.

(2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The analysis performed has resulted in revised P/T limits based on the fracture toughness requirements of 10 CFR 50, Appendix G. Since there is no significant change in the configuration or operation of the facility due to the proposed amendment, use of the revised P/T limits will not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Operation Of the facility in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

The proposed change will not involve a significant reduction in a margin of safety because the requirements of 10 CFR 50, Appendix G are satisfied.

In addition, with respect to the reformatting change, the Commission has provided guidance concerning the application of the standards for determining 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 (i) relates to 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. The proposed change reformatting the existing requirements in TS 3.1.2 is similar to example (i) in that it is an administrative change which states the requirements in a format consistent with that of the Standard Technical Specifications and does not involve technical or plant modifications.

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.