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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41,
 seperating current requirements for electrical sys.

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DECEMBER 20 1988

L-88-511

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
Electrical System Upgrade

By letter L-88-478, dated November 2, 1988, Florida Power & Light Company (FPL) submitted comments on the Proof and Review version of the revised Technical Specifications for Turkey Point Units 3 and 4. In that letter FPL agreed to forward under a separate submittal, a proposed license amendment for the electrical system. The proposed license amendment and supporting documentation, are attached.

The proposed changes separate the current requirements for the electrical supply systems into three subgroups (AC Power Sources, D.C. Power Sources and Onsite Power Distribution), and add more restrictive Limiting Conditions for Operation (LCO) for diesel generator operation and onsite power distribution. Additionally this proposed change provides LCOs during MODES 5 and 6 for these three subgroups and provides the reliability enhancements of Generic Letter 84-15 where appropriate. This scope of this amendment request was discussed with the NRC Staff on September 13, 1988. As discussed in the above referenced letter, FPL requests that these changes be reviewed and an amendment issued independent of the technical specification upgrade review effort.

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. 9819 for \$150 is attached as remittance for the licensee amendment application fee.

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U. S. Nuclear Regulatory Commission
L-88-511
Page two

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 on this request, please contact us.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/PLP/RDH/gp

Attachments

cc: Mr. Malcolm Ernst, Acting Regional Administrator, Region II,
USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. Jacob Nash, Florida Dept. of Health and Rehabilitative
Services

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

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

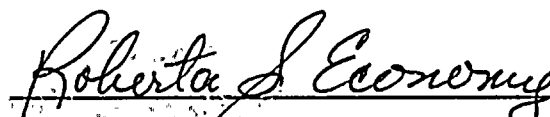
That he is Senior Vice President - Nuclear, of Florida Power and Light Company, the Licensee herein;

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

Subscribed and sworn to before me this
20 day of December, 1988.



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.



TURKEY POINT UNITS 3 AND 4
PROPOSED LICENSE AMENDMENT

TITLE: ELECTRICAL POWER SOURCES

DESCRIPTION:

This Proposed License Amendment (PLA) to the Turkey Point Technical Specifications (TS) separates the current requirements for the electrical supply systems into three subgroups (A.C Power Sources, D.C. Power Sources and On-site Power Distribution), and adds a more restrictive Limiting Condition for Operation (LCO) for diesel generator operation. Additionally, this PLA provides LCOs during MODES 5 and 6 for these three subgroups. The changes are as follows:

Page i, ii and v

The Table of Contents has been revised to correct several typographical errors, and to retitle Section 3.7, Electrical Power Sources. The List of Tables has been revised to include Table 3.7-1, Battery Charger Allowable Out-of-Service Times.

Pages 3.7-1 to 3.7-8

TS 3.7.1

Requirements for the AC electrical power sources, 4160 volt busses, 480 volt load centers and motor control centers, and batteries and associated DC system have been deleted from existing TS 3.7 and are addressed separately in TS 3.7.1, TS 3.7.2 and TS 3.7.3. A more restrictive LCO has been proposed that requires both diesel generators and both startup transformers and their associated circuits to be OPERABLE in MODES 1 through 4. A more restrictive action statement for an associated unit's startup transformer out of service is proposed. This action statement requires the out of service startup transformer to be restored to OPERABLE status within 24 hours or the effected unit's THERMAL POWER is required to be reduced to $\leq 30\%$ RATED POWER (if in mode 1) or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours (if in modes 2,3, or 4). A surveillance requirement for the two in service diesel generators was added to the action statement when the associated startup transformer is out of service. A new action statement for the opposite unit's startup transformer has been proposed. If the out of service startup transformer can not be restored to OPERABLE within the 30 days, then the remaining unit must be placed in HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours. The requirement to notify the NRC of an out of service startup

transformer within 24 hours was retained. A more restrictive action statement for one diesel generator out of service is proposed. This statement requires that a diesel generator, which is out of service other than for selected refueling outage surveillance requirements, be restored to OPERABLE status within 72 hours or both the units must be placed in HOT STANDBY within the next 12 hours and COLD SHUTDOWN within the next 30 hours. If a diesel has been removed from service to perform a preplanned refueling outage surveillance, the current 7 day administrative control, which FPL committed to in FPL letter L-86-348, dated August 27, 1986, applies before the effected unit(s) must be in HOT STANDBY in 12 hours and COLD SHUTDOWN within the next 30 hours. The testing requirement for the inservice diesel has been better defined to require only the surveillance requirement described in statement 4.8.1.a.4. This deletes the previous implied requirement to synchronize and run the diesel for one hour. An action statement has been proposed for two diesel generators out of service. This action statement generally conforms to the current TS 3.0.1 requirements by requiring the effected unit(s) be placed in HOT STANDBY in 12 hours and COLD SHUTDOWN in 30 hours. (TS 3.0.1 allows only 6 hours to reach HOT STANDBY. The 12 hour time allowance to reach HOT STANDBY has been proposed to allow a more controlled dual unit shutdown.) An action statement for one diesel generator and one startup transformer out of service has been proposed. This action statement proposes that the unit with the out of service startup transformer return the inoperable startup transformer to operable status in 12 hours or reduce THERMAL POWER to $\leq 30\%$ RATED POWER within the next 6 hours. Also the action statement has been revised to require an immediate shutdown if the unit with the inoperable startup transformer is in Modes 2, 3 or 4. The remaining unit must return the inoperable diesel generator to OPERABLE within 72 hours or be in HOT STANDBY in 6 hours and COLD SHUTDOWN in the following 30 hours. An action statement for two start-up transformers out of service has been added to require that the operability of the two emergency diesel generators be demonstrated and that both units' THERMAL POWER be reduced to $\leq 30\%$ RATED POWER within 12 hours (if in Mode 1), or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours (if in Modes 2, 3, or 4). A requirement to notify the NRC within 1 hour of declaring both startup transformers inoperable has been added. Each unit shall remain at $\leq 30\%$ RATED POWER until its associated startup transformer is restored to OPERABLE status.

TS 3.7.1.2

This is a new TS added to provide MODE 5 and 6 LCOs for the diesel generators and startup transformers. This TS requires that if one diesel and one startup transformer and associated circuits (or backfed power through the main and auxiliary transformer) are not operable, all operations involving CORE ALTERATIONS, positive

reactivity changes, movement of irradiated fuel, or crane operation with loads over the fuel storage pool be immediately suspended and within 8 hours depressurize and vent the reactor coolant system through an opening 2.2 square inches or greater.

TS 3.7.2.1

The new TS 3.7.2.1 takes the D.C. sources out of the old TS 3.7.1 and places them in a separate TS using similar LCO and action statements to the requirements that had been applied in the old TS 3.7. The LCO requires the 3A, 3B, 4A and 4B batteries and battery chargers 3B, 4A, 4S, and any two battery chargers of 3A, 4B, or 3S to be OPERABLE during operation in MODES 1 through 4. The first new action statement requires an inoperable battery be restored within 24 hours or the units must be placed in HOT STANDBY in the next 12 hours and COLD SHUTDOWN in the following 30 hours. The 12 hour time allowance to reach HOT STANDBY has been proposed to allow for a more controlled dual unit shutdown. A more restrictive action statement than currently required under TS 3.0.1 has been proposed for an out of service battery charger by placing requirements on the operability of the fifth battery charger. The proposed action statement places action limits on the fifth battery charger and allows from 1 hour to 72 hours to repair an out of service chargers depending on the current battery charger configuration. A table has been provided to determine the action statement time limit. If the out of service battery charger(s) cannot be restored to OPERABLE within the limit specified, the units must be placed in HOT STANDBY in the next 12 hours and COLD SHUTDOWN in the following 30 hours. The current TS 3.7 also does not have an action statement time limit for an out of service battery charger, this thus invokes TS 3.0.1. The 12 hour time allowance to reach HOT STANDBY has again been proposed due to the dual unit shutdown impact of the action statement.

TS 3.7.2.2

This new TS applies LCOs and an action statement for the D.C. system during operation in MODES 5 and 6. The LCO requires that a minimum of three batteries and associated chargers be OPERABLE or the unit must immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, or movement of irradiated fuel and within 8 hours depressurize and vent the reactor coolant system through an opening 2.2 square inches or greater.

TS 3.7.3.1

The new TS 3.7.3.1 takes the on-site power distribution out of the old TS 3.7 and places similar requirements into a separate TS. The proposed new LCO is more restrictive in that it requires all

safety related 4160 V buses, Motor Control Centers (MCC), and load centers be operable. The electrical components have been separated into trains and action statements written based on the inoperability of one of the trains. The exception to this is MCC 3A and D. A separate LCO and action statement has been written for these MCCs due to the shared unit and swing bus design. A less restrictive action statement has been proposed that would allow operation with one of the associated unit's AC trains out of service for a period of 8 hours before the train would have to be re-energized or the unit placed in HOT STANDBY in 6 hours and COLD SHUTDOWN in the next 30 hours. For the opposite unit's AC trains, a more restrictive action statement has been proposed that allows one train to be de-energized for a period of 7 days during the performance of periodic refueling outage maintenance before the unit must be placed in HOT STANDBY in 6 hours and COLD SHUTDOWN in the following 30 hours. If one of the opposite unit's AC trains is de-energized for any reason other than performance of periodic refueling outage maintenance, a 72 hour action statement has been proposed. This action statement is also more restrictive than the current TS which requires that only one partial train of AC power from the opposite unit be energized in MODES 1 to 4. A new less restrictive action statement for MCC D has been proposed. This action statement allows MCC D to be de-energized for up to 8 hours when out of service for non routine maintenance before the MCC must be re-energized or both units placed in HOT STANDBY in 12 hours and COLD SHUTDOWN within the following 30 hours. An additional action statement is provided which allows MCC D and 3A (normal supply only) to be de-energized for up to 24 hours for routine plant maintenance before the MCC must be re-energized or both units placed in HOT STANDBY in 12 hours and COLD SHUTDOWN within the following 30 hours. If either the normal or alternate power supply to MCC D or if the normal power supply to MCC 3A is not available a more restrictive interpretation of the current TS 3.7 has been proposed that would require the out of service power supply be restored within 72 hours if the power supply is out of service for a reason other than periodic refueling outage maintenance or both units must be placed in HOT STANDBY in 12 hours and COLD SHUTDOWN within the following 30 hours. If the normal or alternate power supply to MCC D or if the normal power supply to MCC 3A is out of service for periodic refueling outage maintenance a 7 day action time limit is proposed.

TS 3.7.3.2

This new TS applies an LCO and action statement to the on-site power distribution system during operation in MODES 5 and 6. In the shutdown modes a minimum of one train of AC emergency power consisting of one 4160 volt and two 480 volt AC load centers are required or the unit must immediately suspend all operations involving CORE ALTERATIONS, positive reactivity changes, or movement of irradiated fuel and within 8 hours depressurize and

vent the reactor coolant system through an opening 2.2 square inches or greater.

Pages 4.8-1 to 4.8-4

A typographical error in statement 4.8.1.d.4 has been corrected to reference the correct test.

A revised Table 4.8-1 has been added for determining the diesel generator testing frequency. This table contains the testing frequency similar to that recommended in Generic Letter 84-15. Depending on the diesel generator reliability, the new testing frequency could be considered a less or a more restrictive surveillance requirement. Additionally a new reporting requirement has been added that would require a 30 day report of all valid diesel generator failures.

A footnote has been proposed for statements 4.8.1.a.4, and 4.1.8.a.5 that would allow engine starts to be preceded by an engine pre-lubrication period and/or warmup procedure. This footnote applies to all surveillance engine starts with the exception of one test every 184 days which must be performed from normal conditions. An additional requirement has been proposed in the 8 hour load run test of the diesel defined in 4.8.1.d.5.a that requires a momentary load increase to 2850 kw. A clarification to the load reject test in statement 4.8.1.d.1.b has been proposed to specify the full load rejection requirement of 2500 kw. The upper limit on the voltage peak has been removed and a requirement to verify that the steady state diesel generator voltage returns to 4784 volts or less in two seconds or less has been proposed. Additionally, the tolerance on the voltage during the reject test in statement 4.8.1.d.1.a has been modified to propose the more restrictive peak voltage tolerance ± 420 volts and a more restrictive load rejection requirement of 380 kw. Lastly a proposed change to TS 4.8.1.d would allow the testing requirements of this surveillance to be performed on a refueling outage basis versus the current 18 month requirement.

Page 6-19

TS 6.9.3 has been revised to include the new standard technical specification reporting requirement added under TS 4.8.1.f. The reporting of non-valid test failures has been deleted from this requirement.

Pages B3.7-1 to B3.7-3

Appropriate changes have been made to include the basis for the LCO and action statements added to proposed TS 3.7.



Appropriate changes have been made to include the basis for the surveillance requirement changes proposed under TS 4.8.

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 10 CFR 50.92. 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.

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.

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

In addition to the changes discussed below, the existing electrical systems technical specifications have been reformatted to be consistent with the standard technical specifications (i.e. limiting conditions for operation, mode applicability and required actions are explicitly stated). These changes are administrative and are similar to example (i) above.



TS 3.7.1.1

The proposed limiting conditions for operation are more restrictive than the current requirements in that both start-up transformers are required to be OPERABLE. Current TS 3.7.1.a now requires that the associated start-up transformer be in service prior to either unit being started up from COLD SHUTDOWN. This change is an additional restriction and is similar to example (ii) above.

The action requirements for one start-up transformer inoperable are more restrictive than the current requirements in that power is reduced on the associated unit while the start-up transformer is out-of-service, and additional requirements are imposed on the other unit. The current TS requirements would permit the units to remain at power. In addition a requirement to demonstrate the operability of both diesel generators (if they have not been successfully tested within the past 24 hours) has been added. The current TS requires that the diesel be operable. These changes are additional restrictions, and are similar to example (ii) above.

The action requirements for one diesel generator inoperable are more restrictive than the current requirements in that they require the diesel generator to be returned to service within 72 hours (7 days if out of service for the performance of surveillance requirements). The current TS do not specify a limit, however, FPL has agreed to a 7 day administrative limit. In addition, specific time limits to verify that the engineered safety features of the remaining diesel generator are OPERABLE and to verify the OPERABILITY of the required start-up transformers and their associated circuits are specified. They are not specified in the current TS. These changes are additional restrictions and are similar to example (ii) above.

Requirements to notify the NRC within 12 hours and 1 hour of the one startup transformer and one diesel generator inoperable case and the two startup transformers inoperable case, respectively, have been added for those specific degraded conditions. The current TS have no similar requirements. These changes are additional restrictions, and are similar to example (ii) above.

The proposed change to extend the action time limit to reach HOT STANDBY from 6 hours as currently allowed in TS 3.0.1 to 12 hours does not involve a significant hazards consideration because this change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. The proposed TS asks for an additional 6 hours to allow for a more orderly shutdown of two units. The additional time would reduce the likelihood for transients to be introduced on the system power grid by allowing a slower more controlled power addition/replacement operation. Since a more gradual organized power reduction would be facilitated

by the 6 hour extension of the shutdown time frame and the likelihood of an accident being initiated during the additional 6 hours is remote, the change would not involve a significant increase in the probability of or the consequences of an accident previously evaluated.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new modes of operation nor involves a physical modification to the plant.

(3) involve a significant reduction in the margin of safety because the increased time is facilitating a more orderly power reduction on the grid and thus reducing the likelihood of a system load rejection and resulting unit scram and transient.

The proposed change to relax the requirement to demonstrate operability of the remaining diesel generator upon loss of a diesel generator through the performance of a test that includes the synchronizing and running of the diesel generator does not involve a significant hazards consideration because this change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. This change is consistent with the discussions contained in I.E. Information Notice 84-69 and Supplement 1, whereby the diesel generators are to be kept independent of disturbances on the non-vital and offsite power systems that can affect emergency power availability. The ability of the diesel generator to start, synchronize and load will still be demonstrated in accordance with the frequency specified in Table 4.8-1. Since the relaxation of this requirement could reduce the likelihood of the loss of a diesel generator that was synchronized simultaneous to the loss of offsite power by reducing the number of times the diesel was in this configuration, the change would not involve a significant increase in the probability of or consequences of an accident previously evaluated.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change keeps the diesel generator(s) independent of disturbances on non-vital and offsite power systems that can affect emergency power availability. Additionally, this change does not involve a physical modification to the plant.

(3) involve a significant reduction in the margin of safety as this relaxation allows the diesel generator(s) to be kept independent of the non-vital and offsite power systems but, will still be demonstrated operable by verification of the diesel generator(s)'s ability to start in accordance with the frequency described in Table 4.8-1.

The proposed change to relax the requirement to shutdown a unit when a startup transformer and diesel generator are inoperable and when two startup transformers are inoperable does not involve a significant hazards consideration because this change would not:

(1) Involve a significant increase in the probability of or consequences of an accident previously evaluated. The proposed ACTION statements allow the operator to recover offsite power or redundant onsite AC power capabilities while maintaining the unit in a stable condition. By not requiring a complete unit shutdown, the plant avoids a condition requiring natural circulation and avoids intentionally relying on engineered safety features for non-accident conditions. By reducing THERMAL POWER to $\leq 30\%$ RATED POWER, the decay heat load and initial conditions assumed in the accident analyses are more conservative and thus do not involve a significant increase in the consequences of accidents previously analyzed.

Because the proposed changes would maintain the plant in a stable initial condition that has been considered in the accident analysis, the change would not involve a significant increase in the probability of or consequences of an accident previously analyzed.

(2) Create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new mode of plant operation nor involve a physical modification to the plant.

(3) Involve a reduction in a margin of safety because the revision allows time to recover a source of offsite power to the unit(s) while maintaining the unit(s) in a stable condition. Maintaining the unit(s) in a stable condition would allow time to make repairs and avoid a natural circulation cooldown condition with reliance on engineered safety features performing in non-accident conditions. In the unlikely event that a startup transformer and a diesel generator are inoperable or both startup transformers are inoperable, operational consideration to reduce THERMAL POWER to $\leq 30\%$ RATED POWER and maintain stable plant conditions while re-establishing off-site and/or on-site emergency power capabilities to vital busses does not involve a significant increase in a margin of safety.

TS 3.7.1.2

The proposed changes are more restrictive in that a new LCO has been established for operation in MODES 5 and 6 where previously no restrictions on a unit operating in these modes existed. These restrictions ensure that at least one coolant loop has a source of onsite AC power available and that overpressure conditions can be relieved as discussed in the revised bases. These new restrictions



are consistent with the design basis and do not affect previous assumptions for loss of offsite power and emergency power or the margin of safety since the proposed changes do not introduce new modes of plant operation nor involve a physical change to the plant. Thus, these changes do not pose a significant hazards consideration.

TS 3.7.2.1

The proposed changes are primarily administrative or more restrictive in nature. The LCO and action statements for the D.C. system that had been included in TS 3.7 have been removed and placed in their own TS. The previous LCO requirement and the action statement for the batteries, although reworded, remains primarily unchanged. The time allowance to reach HOT STANDBY has been extended to 12 hours due to the dual unit shutdown requirement of this action statement. (This change has been discussed under TS 3.7.1 above.) The proposed LCO for the battery chargers has been made more restrictive to now require a selected five of the six safety related battery chargers to be operable. The action statement has been revised to be more restrictive in that it places operability restrictions on the fifth battery charger. The time allowance to reach HOT STANDBY has again been extended to 12 hours due to the dual unit shutdown requirement. (See justification provided under TS 3.7.1 above.) These changes are consistent with the design basis and do not effect previous assumptions for the loss of D.C. power or the margin of safety since the proposed changes do not introduce new modes of plant operation nor involve physical changes to the plant. Thus, these changes do not pose a significant hazards consideration.

TS 3.7.2.2

The proposed changes are more restrictive in that a new LCO has been established for operation in MODES 5 and 6 where previously no restrictions on a unit operating in these modes existed. These changes are consistent with the design basis and do not effect previous assumptions for loss of D.C. power or the margin of safety since the proposed changes do not introduce new modes of plant operation nor involve physical changes to the plant. Thus, these changes do not pose a significant hazards consideration.

TS 3.7.3.1

The proposed changes are primarily either administrative (i.e., the LCO and action statements for the 4160 volt buses and 480 volt load centers and motor control centers that had been previously included in TS 3.7 have been separated and included into the new TS 3.7.3) or more restrictive (i.e., the new LCO requires both energized

trains of AC from the associated unit and the opposite unit, an action statement on a de-energized train of AC power from the opposite unit has been proposed, a new action statement on the normal and alternate power supply to MCC D and 3A (normal power supply only) has been proposed). These proposed changes are consistent with the design basis and do not effect previous assumptions for onsite power distribution or the margin of safety since the proposed changes do not introduce new modes of plant operation nor involve physical changes to the plant. Thus, these changes do not pose a significant hazards consideration.

The proposed change to relax the immediate shutdown requirement if a train of associated unit's AC power or MCC 3A and D is de-energized does not involve a significant hazards consideration because this change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. The proposed action statement allows 8 hours to recover the inoperable train or MCC D (if MCC D is de-energized for reasons other than periodic refueling outage maintenance). The additional time provided by this TS has the advantage of maintaining the plant in a stable condition while repairs are made. If repairs cannot be made within 8 hours, the additional time to prepare for the shutdown would provide for a more organized procedure. The 8 hour time period is consistent with industry practice in that it is the time period allowed by the standard TS. In addition, the proposed action statement would allow 24 hours to recover MCC D if de-energized due to periodic refueling outage maintenance. This action is consistent with action statements for equipment powered by MCC D. Since the proposed change would allow additional time to prepare to shutdown the unit, provide sufficient time for desired maintenance, and the likelihood of an accident being initiated during the additional 24 hours is remote, the change would not involve a significant increase in the probability of or the consequences of an accident previously evaluated.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change does not introduce any new modes of operation or involve physical modifications to the plant.

(3) involve a significant reduction in the margin of safety because the revision allows time to recover the affected bus while preparing for an organized shutdown. Maintaining the plant in a stable condition would allow time to make repairs and avoid a transient cooldown condition.



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TS 3.7.3.2

The proposed changes are more restrictive in that a new LCO has been established for operation in MODES 5 and 6 where previously no restrictions on a unit operating in these modes existed. These changes are consistent with the design basis and do not effect previous assumptions for onsite power distribution or the margin of safety since the proposed changes do not introduce new modes of plant operation nor involve physical changes to the plant. Thus, these changes do not pose a significant hazards consideration.

TS 4.8.1

These changes are primarily administrative (i.e., correct a typographical error in statement 4.8.1.d.4., add an additional reporting requirement for a failed diesel generator surveillance test) or more restrictive (i.e., add the requirement to test the diesel with a momentary load of 2850 kw, increase the load in the load rejection test to 380 kw). The change of the diesel inspection requirement in surveillance 4.8.1.c.1 from the Unit 3 outage to the Unit 4 outage is an administrative change. This surveillance was performed during the dual unit outage in the Fall 1988 and to maintain the similar surveillance schedule that currently exists, the next surveillance and following surveillance would coincide with the Unit 4 refueling outage. These changes are consistent with the design basis and do not effect the previous assumptions of offsite power availability or the margin of safety since the proposed changes do not introduce new modes of operation nor involve physical changes to the plant. Thus, these changes do not pose a significant hazards consideration.

The proposed change to relax the requirement to always demonstrate each diesel generator operable by performance of a cold fast start, to allow for performance of a cold fast start only at least once per 184 days and all other starts to be preceded by warmup procedures, does not involve a significant hazards consideration because this change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. Generic Letter 84-15 requested Licensees to reduce the number of cold fast start surveillance tests from normal conditions for diesel generators. It is felt that a reduction in diesel generator cold start testing would improve diesel generator reliability. The proposed change would enhance diesel generator reliability by eliminating excessive cold fast start testing which can lead to premature diesel engine failures. Since the proposed change would serve to enhance the diesel generator reliability and overall plant safety, there would be no significant increase in either the probability or consequences of a previously evaluated accident.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new mode of plant operation nor involves a physical modification to the plant.

(3) involve a significant reduction in a margin of safety because the reduced cold fast start testing frequency provides increased diesel generator reliability by eliminating excessive testing that could lead to premature failures.

The proposed clarification to replace the peak voltage requirement immediately following full diesel generator load rejection test with a peak steady state voltage reading taken 2 seconds following the full load rejection does not involve a significant hazards consideration because this change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. The purpose of the subject surveillance is to verify the proper operation of the voltage regulator and overspeed circuits during a full load rejection. Since the ability to measure instantaneous maximum transient voltage is dependent on the mechanical response of the measurement devices and not necessary reflective of actual regulator performance, the ability of the diesel generator to return to a steady state condition in a defined time period is a more accurate and useful measurement of the diesel generator's ability to properly regulate voltage during the performance of a full load rejection test. Since this change does not affect plant conditions or equipment prior to or during an accident, the proposed revision does not involve a significant increase in the probability of or consequences of an accident previously evaluated.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new modes of plant operation nor involves a physical modification to the plant.

(3) involve a significant reduction in the margin of safety because the diesel generator's ability to regulate voltage following a full load rejection test continues to be monitored and verified to be within established allowable tolerances.

The proposed change to allow the determination of the testing frequency via the revised Table 4.8-1 does not involve a significant hazards consideration because this change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. This revised table is also in agreement with the recommendation provided in Generic Letter 84-15. The proposed change is intended to increase the assurance of the operability of the diesel generators by requiring surveillance requirements based on the reliability of

the diesel and thus would not pose a significant increase in either the probability of or consequences of previously evaluated accidents.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new modes of operation nor involves a physical modification to the plant.

(3) involve a significant reduction in a margin of safety because the proposed change would increase the assurance of the operability of a diesel.

The proposed change to relax the diesel generator surveillance test frequency from every 18 months \pm 25% to a unit's refueling outage does not involve a significant hazards consideration because the change would not:

(1) involve a significant increase in the probability of or consequences of an accident previously evaluated. The current 18 month diesel generator surveillance test frequency is designed to be consistent with the refueling cycle. Thus, the proposed surveillance test frequency is not a relaxation if a unit does not deviate from its refueling schedule by plus or minus 25 %. However, if the unit has an extended operational period, the need to perform the current 18 month diesel generator surveillance would force the unit into an off-normal testing configuration. Because Turkey Point's AC power system design is non-standard and shares common equipment, very specific test configurations are required. Both units need to be taken off-line and one placed in at least HOT STANDBY and the other unit placed in at least COLD SHUTDOWN in order to complete the diesel generator surveillance requirements. This testing configuration is best accommodated in a refueling outage configuration since one unit is already in COLD SHUTDOWN. FPL believes it is unnecessary to subject both units to the additional transient condition when the test requirement can be satisfied by a required unit's near term refueling outage. This would reduce the potential for a plant upset and safety system challenge as a result of two near term plant transients, one to perform the surveillance requirement followed in the near term by a startup and second shutdown for the refueling outage. Because the proposed change would reduce transient plant conditions and still place both units in their normal test configurations, this change would not involve a significant increase in the probability of or consequences of an accident previously evaluated.

(2) create the possibility of a new or different kind of accident from any previously analyzed because the proposed change introduces no new modes of plant operation nor involves a physical modification to the plant.



(3) involve a significant increase in a margin of safety because the number of transient plant conditions will be reduced and the normal test configuration still established.

TS 6.9.3

This proposed change is administrative in that it adds the new standard technical specification reporting requirements established by TS 4.8.1.f to the current list of required special reports. The reporting of non-valid test failures has been deleted for this requirement.