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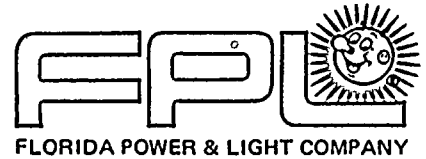
ACCESSION NBR: 8305100165 DOC. DATE: 83/05/05 NOTARIZED: YES DOCKET #
 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
 AUTH. NAME: URRIG, R.E. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Application to amend Licenses DPR-31 & DPR-41, deleting App
 B, ETS re terrestrial biological & physical monitoring
 programs, Request dtd 830210 re deletion of groundwater
 monitoring program withdrawn.

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May 5, 1983
L-83-284

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~~April 25, 1983~~

Office of Nuclear Reactor Regulation
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Darrell G. Eisenhut, Director

RE: Request for Deletion of the Turkey Point Plant
Appendix B, Environmental Technical Specifications
to Operating License Nos. DPR-31 and DPR-41

Dear Mr. Eisenhut:

Florida Power & Light Company respectfully requests the deletion of the Turkey Point Plant, Appendix B, Environmental Technical Specifications to Operating License Nos. DPR -31 and DPR-41 which addresses terrestrial biological and physical monitoring programs. The specifications for which deletion is requested are as follows:

<u>Section</u>	<u>Page</u>
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4.2.1 Revegetation of Cooling Canal Banks	4-3
4.2.2 Long-Term Monitoring	4-4

Attachment A is a detailed listing of the ETS sections for which deletion is requested with justification supporting the requests.

In correspondence to NRC of February 10 and February 16, 1983, deletion of aquatic chemical, thermal and biotic monitoring and surveillance programs (ETS Sections 3.0 and 4.1), the Groundwater Monitoring Program (ETS Section 4.1.1.2) and ETS Section 2.0 (Environmental Protection Limits) were requested. The aquatic thermal, chemical and biological deletions were granted by Amendments 93 and 87 to Operating Licenses DPR-31 and DPR-41, respectively, effective March 11, 1983. FPL reiterates its request for NRC action on deletion of the Environmental Protection Limits (ETS Section 2.0).

Aoo!

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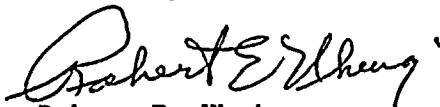
Mr. Darrell G. Eisenhut

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~~April 25, 1983~~

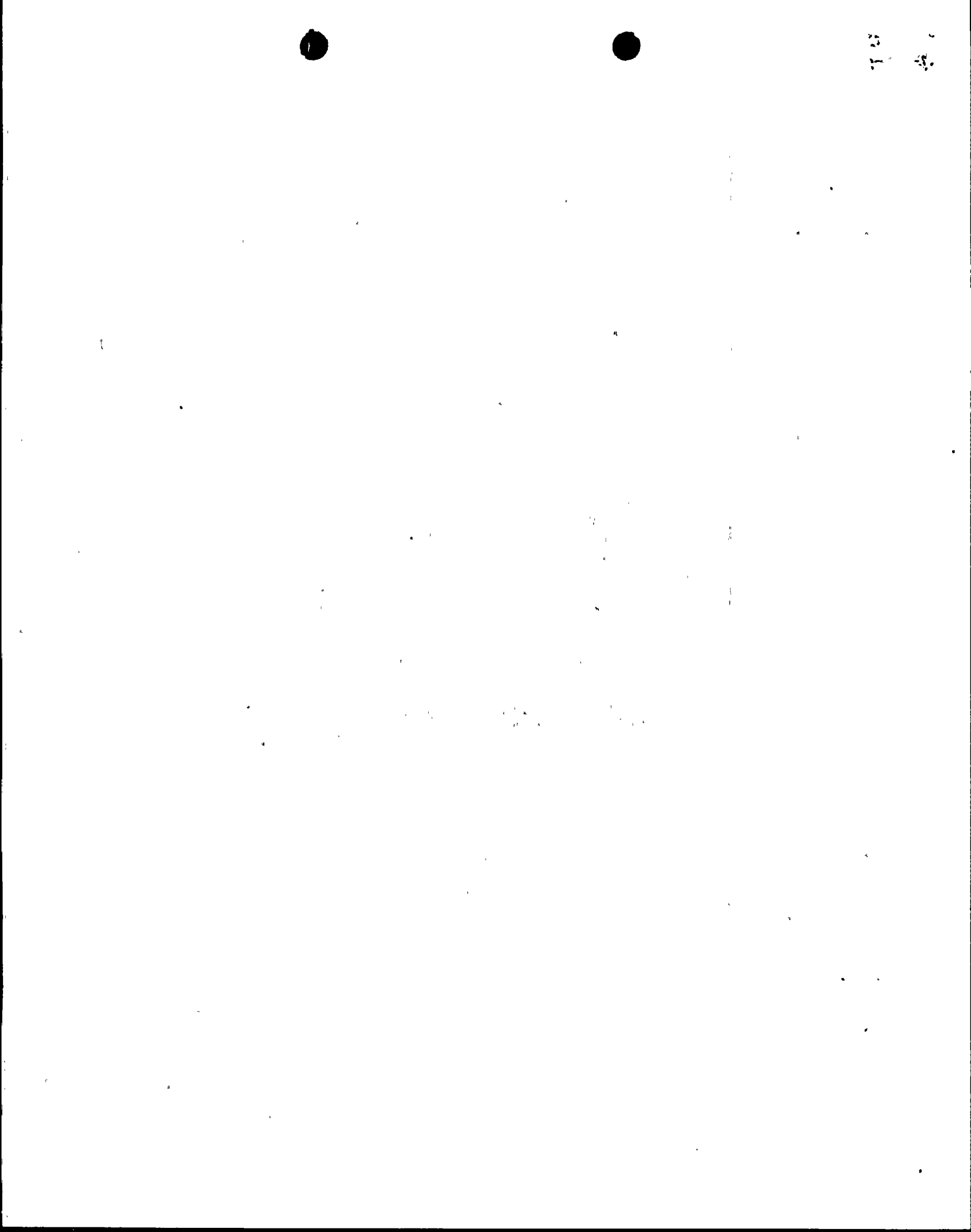
In regard to the Groundwater Monitoring Program, the February 10 request for deletion is being withdrawn pending finalization of a revised groundwater monitoring program which currently is being developed with the South Florida Water Management District. When the revised program is finalized, the request for deletion will be resubmitted to the NRC. Formal request for deletion of ETS Sections 1.0 (Definitions) and 5.0 (Administrative Control) will also be made at that time.

Sincerely,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU:ADB:saj

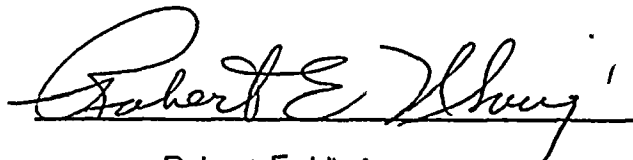


STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

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

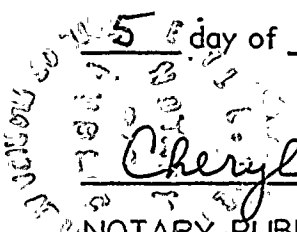
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.



Robert E. Uhrig

Subscribed and sworn to before me this

5 day of May, 1983.


Cheryl L. Fredrick

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

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1983
Bonded thru Maynard Bonding Agency

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U.S. DEPT. OF AGRICULTURE
WASHINGTON, D.C.

ATTACHMENT A

4.2 Terrestrial Environment

4.2.1 Revegetation of the Cooling Banks

4.2.1.1 This program shall analyze soils of the berms for pH, chloride content and selected nutrients. Soil samples shall be taken at points (1) just above the canal water level, (2) halfway between the water and the top of the soil bank, and (3) from the top of the banks. Tests to determine erosion rates in both the wet and dry season shall also be performed. Simultaneously, a biological study shall be conducted to identify the number and species of fauna, as practicable, associated with these banks, as compared to baseline data. The survey shall include both species that are permanent residents (e.g., amphibians, reptiles) and transient users (e.g., birds) of the habitat.

4.2.1.2 An experimental program shall be conducted to revegetate the canal berms using native and/or commercially useful species that will colonize the spoil banks. The rate of this revegetation effort shall be compared with the natural rate of revegetation that occurs on other berms of the system.

4.2.1.3 Reporting Requirements

Results of the studies in paragraph 4.2.1. shall be included in the Annual Environmental Monitoring Report. The requirements under 4.2.1.2 shall be fulfilled and summarized in a summary report to be submitted to the NRC when the study has been completed.

The experimental revegetation program of 4.2.1.2 has been previously completed and deleted.

4.2 through JUSTIFICATION FOR DELETION

4.2.1.3

Eight years of studies are adequate to define the limiting nutrients for the area and conclude that upland species of both plants and animals will continue to invade the canal system and that elevated topography and increased shoreline are the primary factors influencing species shifts. Erosion rate studies on the cooling canal berms have not resulted in any information of particular concern. Further monitoring will only give more support to the conclusions already drawn. Deletion for these sections is requested.

4.2.2 Long-Term Monitoring

Objective

To obtain information which will help to evaluate the long-term impact of the cooling canals.



Specifications

In conjunction with the work described in paragraph 4.2.1, long-term monitoring shall include:

- 4.2.2.1 Annual color infrared aerial photographs will be made of the site at a scale of 1:24,000.
- 4.2.2.2 Surveillance of canal banks to document changes in edaphic and floristic conditions, especially reinvasion by native flora such as red mangrove.

4.2.2.1 &
4.2.2.2

JUSTIFICATION FOR DELETION

Annual color infrared aerial photographs taken for the past eight years have shown only limited vegetational changes. Photographic analysis has indicated that natural phenomena such as freezes and fires have had a far greater effect on major vegetational changes than any effects from power plant and cooling system operation. Deletion of these sections is requested.

(Edaphic explanations are covered in 4.2.1.1 of this document)

Recolonization by upland trees and shrubs is occurring primarily along the western (upland) boundaries of the system, while salt-grass and buttonwood tend to dominate the eastern berms. Australian Pine have spread on any high ground and seems to prefer a loose, open substrate. Deletion of this monitoring requirement is requested.

A vegetation control program has been in progress for the past 3 years. The program is designed to eliminate tall woody species which impede airflow over the cooling canal system and inhibit evaporative cooling. This necessary ongoing control program severely limits the usefulness of data collected to demonstrate recolonization patterns.

- 4.2.2.3 Annual sampling of selected soil and flora west and south of the canal system to determine the impact of the canal system on the surrounding vegetation.

4.2.2.3 JUSTIFICATION FOR DELETION

Examination of the numbers of species observed for the first time each year since initiation of the program have shown that there have been no major changes in the species list since the change that occurred between December 1976 and December 1977, following the freeze of January 1977.

Results continue to indicate primary impacts are a result of agents such as freezes and extended dry periods and not cooling canal system induced effects. Deletion of this monitoring requirement is requested.

11-11-66

