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 VARGA,S.A. Operating Reactors Branch 1

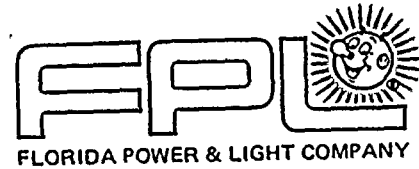
SUBJECT: Forwards response to 850416 request for addl info on 850128
 & 0302 applications to amend Licenses DPR-31 & DPR-41,
 changing Tech Specs re containment sys.

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Office of Nuclear Reactor Regulation
Attention: Mr. Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Varga:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Containment Integrity,
Request for Additional Information
NRC TAC Nos. 56806 and 56807

Attached is Florida Power and Light Company's response to your April 16, 1985 request for additional information regarding our January 28, 1985, and March 2, 1985 submittals in which we proposed revisions to the Turkey Point Units 3 and 4 Technical Specifications related to containment systems.

If you have any questions regarding this response, please call us.

Very truly yours,

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

Attachment

JWW/TCG/eab

Foot

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FPL Response to Request for Additional Information

Proposed Amendment to Appendix A of Facility Operating License DPR 31/41

Turkey Point Nuclear Plant, Units 3 and 4

Docket Nos. 50-250/251

FPL's proposed containment integrity license amendment revises the Turkey Point Plant Technical Specifications (TS) to allow breaching of containment integrity of an operating unit to perform required surveillance or other testing under administrative controls. It was submitted to meet a commitment made to NRC Inspector C. M. Hosey which was documented in IE Inspection Report 50-250/84-27 and 50-251/84-28.

In the same amendment FPL revised certain other sections of the TS which were difficult to interpret or where required actions were not clearly defined. In doing so FPL utilized NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors (WSTS), Revision 5 (Draft), for guidance. It was not our intent in the proposed amendment to upgrade to the WSTS. It is our understanding that, unless specific deficiencies are identified, existing plant technical specifications are considered to be adequate, and need not be upgraded to the latest version of the WSTS solely for consistency with that document.

FPL does have an ongoing program to revise the TS for Turkey Point to incorporate the philosophy and intent of the WSTS. Comments made in the April 16, 1985 request for additional information regarding the WSTS will be considered when upgraded TS are submitted.

The following information is provided; in response to your April 16, 1985 request for additional information, to support the proposed changes to the TS concerning containment systems:

NRC Question

1. TS page 1-2, Section 1.5, definition of Containment Integrity:
The proposed definition is based on the definition appearing in the Westinghouse Standard Technical Specifications (WSTS), Section 1.7. Discuss why reference to sealing the equipment hatch and reference to the operability of the sealing mechanisms associated with the penetrations were omitted in the proposed changes to the TS.

FPL Response

The current TS definition for containment integrity states in part that "the equipment hatch is properly closed". FPL retained that wording in the proposed TS. TS 4.4.2 (Local Penetration Tests) requires that the equipment access opening be leak tested (pressure applied between gaskets) annually and after each use.

Reference to the operability of the sealing mechanisms associated with the containment penetrations is not in the current TS, and therefore was not included in the proposed TS. The operability of sealing mechanisms is demonstrated by performance of the tests required by Section 4.4 of the current TS.

NRC Question

2. TS page 3.3-1 Section 3.3.1 Containment Integrity:
Discuss and justify the conditions under which the exception statement may be invoked.

FPL Response

The exception statement in the proposed amendment will allow required surveillance and other testing to be performed under administrative controls.

The following are the conditions under which the exception statement will be invoked:

- a) Prior to breaching containment integrity, an approved procedure or on the spot change (OTSC) shall be available covering the necessary valve manipulations and the requirement to open them.
- b) As a minimum, the procedure shall require a person stationed at the valves being manipulated for the duration of the test or surveillance. This person shall also have direct communication (e.g. radio) with the control room. This step will assure that in case of an accident, the valves in question will be placed in their accident required position.
- c) Once the valves in question are returned to the original position (e.g., closed and locked) independent verification shall be performed to verify proper line-up.
- d) The procedure shall require, by either a caution note or sign-off, that R-14 (Plant Vent Monitor) be continuously monitored while breaching containment integrity. This will ensure prompt action to return the valves to the original position should a release occur while performing the required surveillance or testing.

NRC Question

3. TS page 3.3-1, Section 3.3.3 Containment Isolation Valves:
This section is misleading; rather than address containment isolation valves in a broad context, it narrowly focuses on the isolation times of valves that receive Phase A containment isolation, Phase B containment isolation or containment ventilation isolation signals, and uses isolation time as the only criterion for valve operability. Remote manual, local manual and check valves are not addressed, and the need to exercise administrative control over non-automatic valves to provide assurance of containment integrity is absent. This section should identify, with the

aid of a Table, all valves provided to satisfy GDC 54-57 (including the valves associated with the secondary system penetrations), all valves included in the Type C test program, appropriate closure times for power operated valves and justification for any necessary exceptions to accommodate related technical specifications.

FPL Response

The wording in the proposed TS is unchanged from that in the current TS. This section was revised, using the WSTS as guidance, to clearly specify what actions are to be taken when the current TS is not met, and the applicable modes of operation. Containment isolation valves are required to be operable in accordance with the Turkey Point Plant Pump and Valve Test Program.

NRC Question

4. TS page 3.3-2, Section 3.3.4 Containment Air Locks:
Provide a basis for the proposed statement, "Each containment air lock shall be operable with both doors closed except during the performance of surveillance and/or testing requirements then at least one air lock door shall be closed." Also it is not clear how a door will be kept closed if the inner door is the defective door.

FPL Response

The proposed statement was added to reflect operability requirements for the containment air lock during the performance of surveillance or other testing (e.g. LLRT), and is no less restrictive than the TS for normal transit entry and exit. Action statements were provided to ensure that one door is properly closed if either door is declared inoperable, and to specify the requirements to be met for continued operation in this configuration. If the limiting condition for operation in TS 3.3.4 and applicable action statements cannot be met then the actions required by proposed TS 3.0.1. will be taken.

NRC Question

5. The proposed change to the TS uses a format similar to Revision 5 of the WSTS, but the proposed changes do not include provisions for surveillance requirements, or leak testing. Propose comparable technical specifications which address surveillance requirements and leak testing requirements.

FPL Response

FPL considers the provision for surveillance and leak testing contained in TS 4.4, Containment Tests, in the current TS to be adequate. The provisions for surveillance and leak testing included in the WSTS will be considered when upgraded TS for Turkey Point are submitted.

