

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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  
 WILLIAMS, J.W. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 THOMPSON, H.L. Division of Licensing

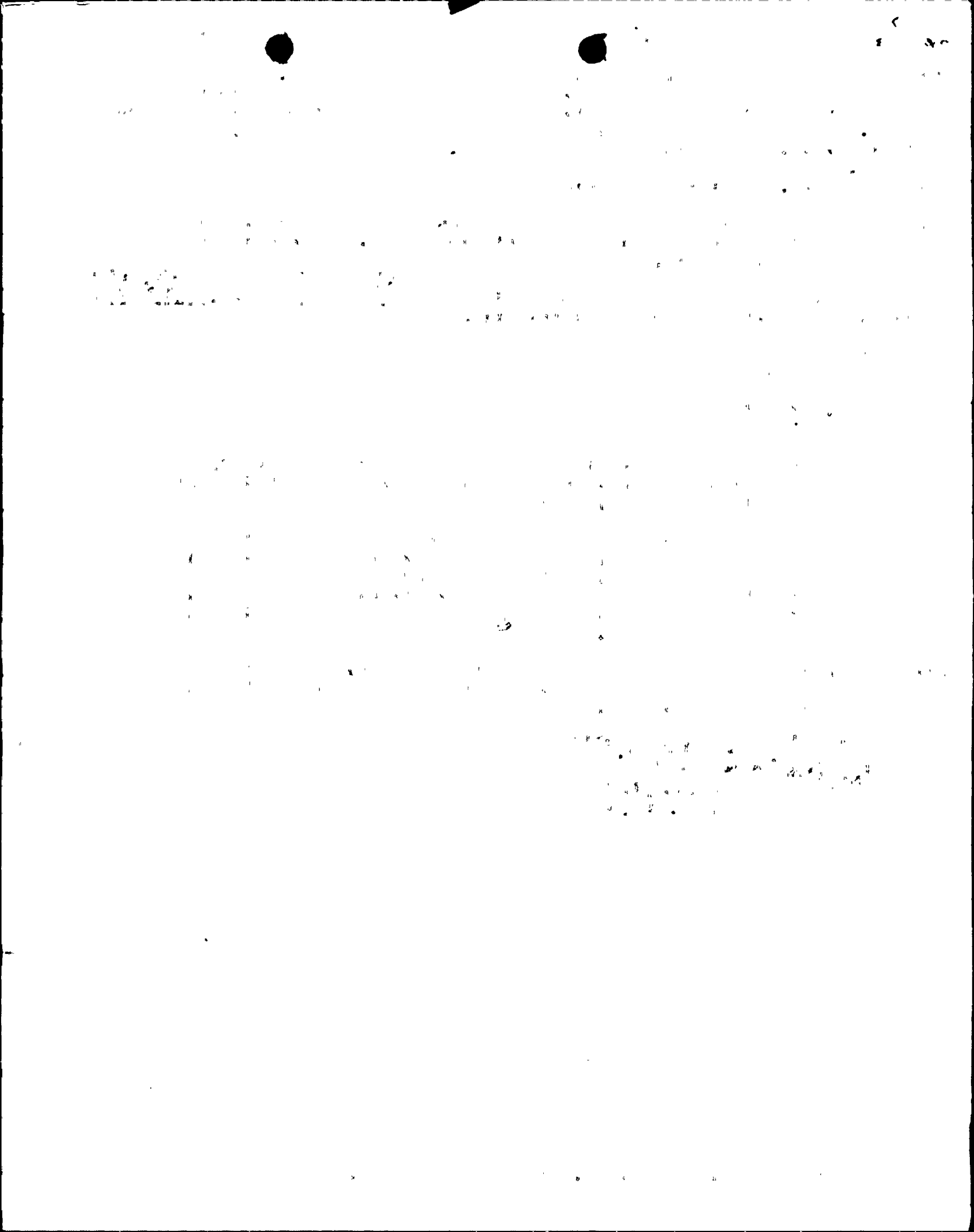
SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising  
 offsite organization & reportable events, per Generic Ltr  
 83-43. Fee paid.

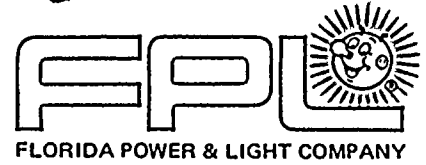
DISTRIBUTION CODE: *"see rept"* COPIES RECEIVED: LTR 3 ENCL 4 SIZE: 8+48  
 TITLE: OR Submittal: General Distribution

NOTES: 05000250  
 OL: 07/19/72 05000251  
 OL: 04/14/73

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	ELD/HDS4	1	0		NRR/DE/MTEB	1	1
	NRR/DL DIR	1	1		NRR/DL/ORAB	1	0
	NRR/DL/TSRG	1	1		NRR/DSI/METB	1	1
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EXTERNAL:	24X	1	1		EG&G BRUSKE, S	1	1
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	NSIC 05	1	1				

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AUG 20 1985

L-85-314

Office of Nuclear Reactor Regulation  
Attention: Mr. Hugh L. Thompson, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Thompson:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendment  
Organization and Event Reporting

In accordance with 10 CFR 50.90, Florida Power & Light Company submits herewith three signed originals and forty copies of a request to amend Appendix A of Facility Operating License DPR-31 and 41.

This amendment is submitted to reflect changes in the off-site organization and to revise event reporting in accordance with Generic Letter 83-43, which implements the reporting requirements of 10 CFR 50, Sections 50.72 and 50.73.

The proposed amendment is described in Attachment 1 and shown on the accompanying Technical Specification pages.

In accordance with 10 CFR 50.91(a)(1), we have determined that this amendment does not involve any significant hazards considerations pursuant to 10 CFR 50.91(c). A discussion of our evaluation is provided in Attachment 2.

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

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PDR

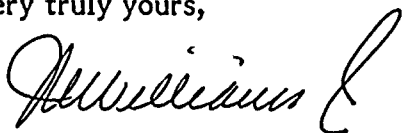
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Office of Reactor Regulation  
Attention: Mr. Hugh L. Thompson  
Page 2

The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power & Light Company Nuclear Review Board.

Very truly yours,



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

JWW/SAV:dkw

Attachment

cc: Mr. J. Nelson Grace, Region II  
Harold R. Reis, Esquire

Lyle Jerrett, Administration  
Radiological Health Services  
Dept. of Health & Rehabilitative Services  
1323 Winewood Boulevard  
Tallahassee, FL 32301

PNE-LI-85-314



STATE OF FLORIDA     )  
                              )  
COUNTY OF DADE     )     ss.

J. W. Williams, Jr., being first duly sworn, deposes and says:

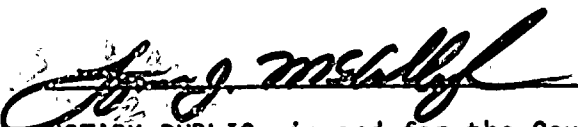
That he is Group Vice President of Florida Power & Light Company, the licensee herein;

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.

  
\_\_\_\_\_  
J. W. Williams, Jr.

Subscribed and sworn to before me this

20 day of AUGUST, 1985

  
\_\_\_\_\_  
NOTARY PUBLIC, in and for the County of  
Dade, State of Florida.

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. FEB 14, 1980  
BONDED THRU GENERAL INS. UND.

My commission expires: 2-14-80

8508280711

## ATTACHMENT 1

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendment  
Organization and Event Reporting

### DESCRIPTION OF REVISIONS AND DISCUSSION

#### Pages i, ii, iii, vi

The Table of Contents and List of Figures are revised to be consistent with the changes discussed below.

#### Page 1-3

The definition of REPORTABLE EVENT is added to the Table of Contents in accordance with Generic Letter 83-43.

#### Page 3.1-5

The requirement to submit a reportable occurrence report for primary coolant specific activity is deleted. Although Generic Letter 83-43 suggests that this be changed to a Special Report, Revision 5 (DRAFT) of Standard Technical Specifications (STS) for Westinghouse Pressurized Water Reactors deletes all reporting requirements for this specification, and we have taken this to be more current staff guidance on this item. If the high specific activity lasts longer than the time allowed in Specification 3.1.4.1, a shutdown would be required, and a report per 10 CFR 50.73 would be submitted with full details of the event. The records of high activity for shorter periods would be available on site for review.

#### Page 3.2-7

The requirement to submit an abnormal occurrence report to the NRC for power tilt is revised to require a Special Report. This is consistent with Generic Letter 83-43.

#### Page 3.14-1 through 3.14-5

The reports required for inoperable fire detection instrumentation, fire suppression water systems, spray and/or sprinkler systems, and fire barrier penetrations are changed from reportable occurrences to special reports in accordance with commitments to the NRC staff. It had previously been determined that these should have been special reports per specification 6.9.3.c, therefore, the Generic Letter 8-43 changes to delete references to reportable occurrences did not apply to these items. The requirement to submit a prompt reportable occurrence if the fire suppression system was inoperable beyond the requirements of other associated specifications is deleted. The requirement to provide a backup fire suppression system provides the safety function. If this requirement is not met, a report pursuant to 10 CFR 50.73 would be required. This deletion is consistent with Revision 5 (DRAFT) of the STS. Also deleted are



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the requirements for a control point guardhouse sprinkler system and the Unit 3 and 4, 4160 volt switch gear room louver sprays.

The guardhouse has been removed and the louver openings were walled up by PCM 83-141 and 83-142. In addition, the term "fire zone boundary" is changed to "fire rated area boundary" to be consistent with 10 CFR 50.48 evaluations and reports, Pages 3.14-4 and 3.14-5 were reformatted and included in this submittal to improve the quality and effective use of our Technical Specifications.

Page 4.2-6 and Table 4.2-3

The prompt reportable occurrence report required for steam generator inspections which fall into Category C-3 is changed to a Special Report. This is consistent with Revision 5 (DRAFT) of the STS.

Page 4.11-1

The 24-hour report with written followup for reactivity anomalies is changed to a Special Report in accordance with Generic Letter 83-43.

Pages 4.15-1 through 4.15-4

This change revises the test interval for hose hydrostatic tests from 3 years to 1 year to be consistent with 10 CFR 50 Appendix R test requirements for outside hose stations.

Pages 6-1, 6-5, 6-6, Figure 6.2-1, Figure 6.2-2, and Table 6.2-1

Specification 6.4.2 is deleted. The required training program for the Fire Brigade is described in 10 CFR 50 Appendix R and duplication in the specification is not necessary. This specification is not in Revision 4 or Revision 5 (DRAFT) of the STS. The other pages are provided for reformatting and page renumbering purposes.

The Off-Site Organization for Facility Management and Technical Support and the Plant Organization Chart are revised to reflect the current structure.

Pages 6-7, 6-8, 6-9 and 6-10

Specification 6.5.1.6.e, 6.5.1.7.c, and 6.5.1.8 are revised to change the titles to be consistent with the organization shown in Figure 6.2-1. Specification 6.5.1.6. is revised in accordance with Generic Letter 83-43 to add the requirement for the Plant Nuclear Safety Committee to review Reportable Events.

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Specification 6.5.2.2 is revised to show the current members of the Company Nuclear Review Board (CNRB), and Specification 6.5.2.3 is revised to adopt the STS wording concerning participation of alternate members.

Page 6-11

Specification 6.5.2.7.g is revised to require CNRB review of Reportable Events in accordance with Generic Letter 83-43.

Pages 6-12, 6-13, 6-14, and 6-15

Specification 6.6 is revised in accordance with Generic Letter 83-43 to address Reportable Event actions. Also revised are titles to be consistent with the organization shown in Figure 6.2-1. Pages are renumbered as necessary.

Pages 6-16, and 6-17

Specification 6.9.2, Reportable Occurrences, is deleted in accordance with Generic Letter 83-43.

Pages 6-18 through 6-22

Special Reports are added to Specification 6.9.3 to be consistent with the proposed specifications discussed above. In addition, pages are renumbered.

Pages 6-23 through 6-27

The record retention requirement for Reportable Events is revised in accordance with Generic Letter 83-43. Page numbers are revised as required.

Pages B3.14-1 and B4.2-13

Bases for fire suppression water system and steam generator inspection results are added.

## ATTACHMENT 2

Turkey Point Units 3 and 4  
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Organizational Event Reporting

### NO SIGNIFICANT HAZARDS DETERMINATION

The changes in this proposed license amendment fall into several groups for significant hazards determination purposes as follows:

1. Changes in accordance with Generic Letter 83-43

These Changes have been identified in the previous attachment. Unless otherwise stated in that attachment, they are consistent with the Generic Letter. These are changes to make the technical specification conform to changes in the regulations (10 CFR 50.72 and 10 CFR 50.73), where the technical specification change results in minor if any changes to facility operations clearly in keeping with the regulations. These changes are similar to example vii of Example of Amendments That Are Considered Not Likely To Involve Significant Hazards Considerations, as published in the Federal Register April 6, 1983.

2. Changes to reflect current FPL organization

These Changes are also identified in the previous attachment. These changes are purely administrative changes to technical specification to reflect changes in position titles and organizational structures. Operation of the facility in accordance with the proposed amendment would not:

- a) Involve a significant increase in the probability or consequences of an accident previously evaluated, because the accident analyses are not affected by these changes to the organization structure.
- b) Create the possibility of a new or different kind of accident from any accident previously evaluated because the method of operating the plant is not affected.
- c) Involve a significant reduction in the margin of safety because these title and organizational changes do not reduce the current margin of safety.

3. Changes of reporting requirements

Several of these changes are made to require Special Reports instead of reportable occurrences. These changes are in accordance with Generic Letter 83-43 and the no significant hazard discussion is provided above. Other changes delete reports that were previously listed as reportable occurrences. For these items, the guidance of the Revision 5 (DRAFT) of

the Standard Technical Specification for Westinghouse Pressurized Water Reactors was used. These deletions involve no significant hazards considerations, because operation of the units in accordance with the proposed amendment would not:

- a) Involve a significant increase in the probability or consequences of an accident previously evaluated because the reports themselves do not affect the accident analysis.
- b) Create the possibility of a new or different kind of accident from any accident previously evaluated because the reports themselves do not affect the method of operation of the plant.
- c) Involve a significant reduction in a margin of safety, because the safety margin of the plant is not affected by the reports.

4. Fire Protection modifications

The revision of Specification 4.15.4.a.4. regarding hose hydrostatic testing to change the test frequency from three years to one year is a change that constitutes an additional control not presently included in the Technical Specifications and is, therefore, similar to example ii of the examples of Amendments That Are Considered Not Likely to Involve Significant Hazards Considerations.

The deletion of Specification 6.4.2 concerning the training of the fire brigade is an administrative change because this requirement exists in 10 CFR 50, Appendix R and does not need to be duplicated in the Technical Specifications. Because it is purely an administrative change it is similar to example i of the Examples of Amendments.

