



SEPTEMBER 29, 1980  
L-86-393

Office of Nuclear Reactor Regulation  
Attention: Mr. Hugh L. Thompson, Jr., Director  
Division of PWR Licensing - A  
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  
Upgrade of Technical Specifications

In accordance with 10 CFR 50.90, Florida Power and Light Company submits herewith three (3) signed originals and forty copies of a request to amend Appendix A of Facility Operating Licenses DPR 31 and DPR 41.

This amendment is submitted to upgrade the current plant Technical Specifications to include, within limitations, the guidance of NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors. The upgrade of the plant Technical Specifications is the objective of the Turkey Point Plant Performance Enhancement Program Project 10.

The Technical Specifications provided in this revision will result in improved direction to plant operators by providing the Technical Specifications in a format consistent with current standards. In addition, overall plant safety and control of plant systems important to safety will be improved because this upgrade adds many operational and surveillance requirements from the Standard Technical Specifications that are not included in the current plant Technical Specifications. We believe the proposed revisions represent the best program for Turkey Point Units 3 and 4 considering the Technical Specification Revision Project development criteria, i.e. no hardware changes (based on the existing design and analytical basis) or other significant operating hardships.

Attachment I includes the proposed Technical Specification revisions. Not included with this submittal are the technical specifications for Fire Protection and the Electrical Power Systems. Deletion of the existing Fire Protection technical specifications will be done under a separate program consistent with NRC Generic Letter 86-10. Technical Specifications 3/4.8.1 through 3/4.8.3 (Electrical Power Systems) have been developed but are still under review and will be submitted at a later date.

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Attachment II is the Safety Evaluation for the proposed amendment. Appendix B to the Safety Evaluation includes the No Significant Hazards Evaluations that correspond to the individual revised Technical Specification subsections, and provides a basis for the conclusions reached in the Safety Evaluation.

There are significant format changes between the current and revised Technical Specifications. Attachment III is a cross reference between subsections in the current Technical Specifications and the revised Technical Specifications. It is provided to assist you in your review.

The attached revised Technical Specifications represent the plant design configuration as of July 31, 1986. Because the NRC review and approval process for this submittal will be substantial, we anticipate that changes to this submittal may be required prior to final NRC approval. We will work with Mr. D. G. McDonald, the NRC Project Manager for the Turkey Point Plant, to establish a program to incorporate any changes made during the NRC review process.

Current plant operating procedures are being revised to include the additional and more restrictive requirements of the revised Technical Specifications. Any proposed Technical Specification relaxations will be incorporated in plant procedures after NRC review and approval of the Technical Specifications. These procedure revisions, along with operator indoctrination and training, need to be considered in determining an implementation date for the approved revised Technical Specifications. At this time we believe implementation will take approximately 6 months after NRC approval. It should be recognized that the need may arise for emergency or exigent Technical Specification relief in the event that an unanticipated conflict or difficulty emerges during implementation.

In accordance with 10 CFR 50.91(a)(1), it has been determined that the proposed amendment does not involve any significant hazards considerations pursuant to 10 CFR 50.92. The No Significant Hazards Considerations determination is provided in Attachment II.

In accordance with 10 CFR 50.92(b)(1) a copy of the proposed amendment is being forwarded to the State Designee for the State of Florida.

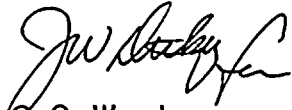
The proposed amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the Florida Power and Light Company Nuclear Review Board.



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In accordance with 10 CFR 170.12(c), FPL Check No. 2344 for the application fee of \$150.00 is enclosed.

Very truly yours,



C. O. Woody  
Group Vice President  
Nuclear Energy

COW/gp

Attachments:

Attachment I	Revised Technical Specifications
Attachment II	Safety Evaluation
Attachment III	Current/Revised Technical Specification Cross Reference

Enclosure

cc: Dr. J. Nelson Grace  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta Street, N.W., Suite 2900  
Atlanta, Georgia 30303

Mr. Alan Schubert  
Public Health Physicist  
Department of Health and Rehabilitative Services  
1323 Winewood Boulevard  
Tallahassee, Florida 32301

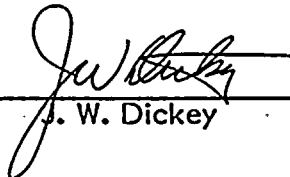
Harold F. Reis, Esquire

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

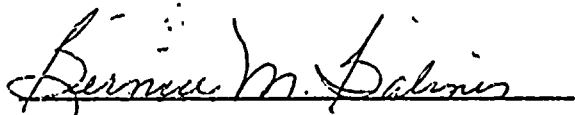
J. W. Dickey being first duly sworn, deposes and says:

That he is Vice President, Nuclear Operations 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.

  
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J. W. Dickey

Subscribed and sworn to before me this  
29 day of September, 1986.

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

My Commission expires:                       
NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP SEPT 18, 1989  
BONDED THRU GENERAL INS. UND.

