ATTACHMENT I

PROPOSED LICENSE AMENDMENT

AMENDMENT NO. FACILITY OPERATING LICENSE NO. DPR-31

DOCKET NO. 50-250

Revise Appendix A as follows:

Remove Pages	Insert Pages
4.7-1	4.7-1
4.7-2	4.7-2

4.7 EMERGENCY CONTAINMENT FILTER SYSTEM, POST ACCIDENT CONTAINMENT VENT SYSTEM, AND CONTROL ROOM VENTILATION SYSTEM.

Applicability: Applies to the Emergency Containment Filter System, the Post Accident Containment Vent System, and the Control Room Ventilation System.

Objectives: To verify that these systems and their components will be able to perform their design functions.

In the event that painting, fire, or chemical release occurs such that the filters are exposed to the effluents of these events, the system will be tested to verify its performance or design features.

Specification: 1. EMERGENCY CONTAINMENT FILTER SYSTEM

1. Operating Tests

System tests shall be performed once per operating cycle or once per 18 months*, whichever comes first. The tests shall consist of pressure drop and flow measurements across all filter banks in the plenum. Less than 6" of water pressure drop at design flow (37,500 cfm ± 10%) across the combined HEPA filter and charcoal adsorbers shall constitute acceptable performance. Visual inspection shall include search for any foreign material and gasket deterioration of the HEPA filters and charcoal adsorbers.

* The surveillence period may be extended for Unit 3 until the refueling outage for Cycle 11.

Once per operating cycle, each unit of the Emergency Containment Filtering System shall be tested to demonstrate automatic initiation upon receipt of a Safety Injection signal. Each unit of the Emergency Containment Filtering System shall be operated monthly for at least 15 minutes on a staggered basis to demonstrate operability.

2. Performance Tests

a. A visual inspection shall be made before each in-place air flow distribution test, DOP test or halogenated leak test. At least once per 18 months* or after every 720 hours of system operation, in-place DOP and halogenated hydrocarbon tests at design flow (37,500 cfm ± 10%) and carbon analysis for each Emergency Containment Filter plenum shall be performed. In addition, carbon analysis and in-place DOP, and halogenated hydrocarbon tests at design flow (37,500 cfm ± 10%) shall be performed after (1) any structural maintenance on system housings, which might have affected filter bank efficiency, (2) after complete or partial replacement of a filter bank, or (3) after operational exposure of the filters to effluents from painting, fire, or chemical release. Removal of ≥ 99% DOP and ≥ 99% halogenated hydrocarbon shall constitute acceptable performance. Fans shall operate at design flow (37,500 cfm ± 10%). The charcoal surveillance specimen from one of the emergency containment filters shall show > 99.9% removal efficiency for elemental iodine. Samples will be taken in accordance with position C.6.b of Regulatory Guide 1.52. Carbon analysis will be performed in accordance with ANSI N510-1975. Analysis shall verify the above removal efficency for elemental iodine within 45 days after removal of the sample. Failing this, the charcoal shall be replaced with charcoal which meets or exceeds the criteria of position C.6.a of Regulatory Guide 1.52 (Revision 2).

b. An air distribution test shall be performed at design flow (37,500 cfm ± 10%) at least once after maintenance affecting flow distribution.

c. Flow rate should be verified following maintenance to HEPA or charcoal housing, or following painting or chemical release in its ventilation zone while the system is operating, or once each 18 months.

* The surveillence period may be extended for Unit 3 until the refueling outage for Cycle 11.

ATTACHMENT 2

PROPOSED LICENSE AMENDMENT
EMERGENCY CONTAINMENT FILTER SYSTEM
SURVEILLANCE REQUIREMENTS

Purpose, Description, and Basis For Emergency

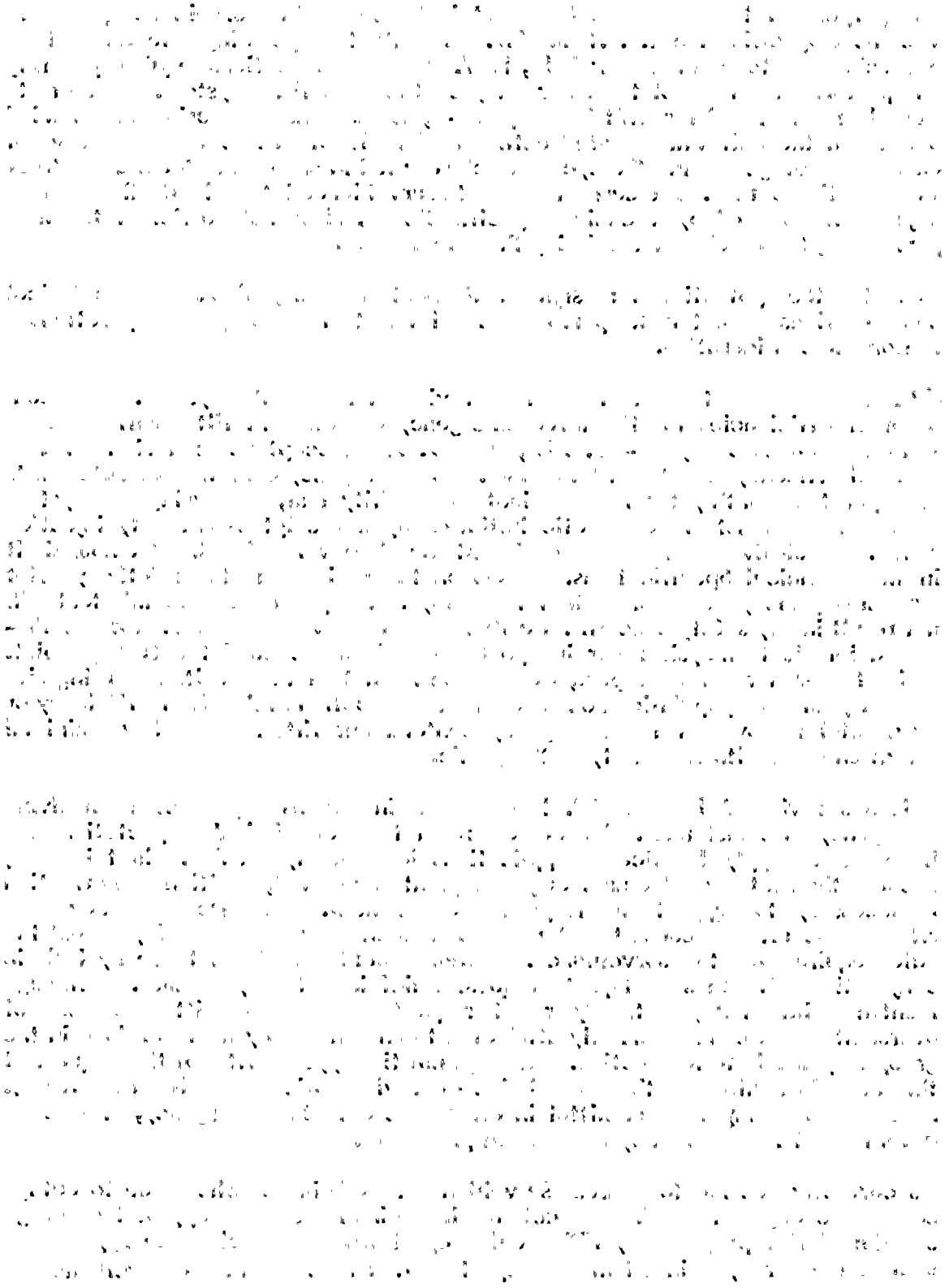
The purpose of this amendment request is to extend the surveillance period in Technical Specification 4.7.1.1 and 4.7.1.2.a until the upcoming refueling outage now scheduled to begin on March 15, 1987. These specifications require operating and performance tests of the emergency containment filter system. These tests were last performed for Unit 3 on April 4-5, 1985. This was during an extended outage on the unit which lasted until mid July 1985. There were also several unplanned outages during the cycle, which resulted in changes to the start date of the refueling outage. The current 18 month surveillance interval with the interval adjustment allowed by Technical Specification 4.0.1 is not sufficient to allow performing the required tests during the refueling outage.

Due to the potential for significant neutron dose, ALARA radiological considerations do not make performance of this test during power operations a reasonable consideration.

FPL has reviewed the results of the previous tests of the system. Charcoal absorber efficiencies for the three emergency containment filter units were as follows: 3A - 99.996%, 3B - 99.999%, 3C - 99.999% (acceptance criteria is >99.9% removal efficency for elemental iodine). The emergency containment filter units are operated monthly for the 15 minute operability test, and during ESF system testing to demonstrate automatic initiation upon receipt of a safety injection signal. Cumulative run times for each unit would be well below the 720 hour limit in the Technical Specifications. Based on the review and the relatively brief extension period, we consider that the delay in the peformance of this test will not result in any safety concerns. Further, we have reviewed a draft state-of-the-art radiological analysis regarding post LOCA iodine control for Turkey Point. While this is not a final report, we are confident that the results regarding site boundary and low population zone show that a reduction in the filter efficiency or even total removal of the emergency containment filters would have minimal effect on the health and safety of the public.

FPL has reviewed 10 CFR 50.91(a)(5) regarding license applications involving emergency circumstances. We are aware of the Commission's expectations for licensees to apply for license applications in a timely fashion. In this case, because the shutdown of a nuclear power plant is involved, additional information is necessary to support the requested amendment. As discussed above the situation occurred because the start of the refueling outage was delayed past the date required for the surveillance. Action should have been taken by FPL in conjunction with these delays to request relief in a timely manner. Although identified internally, a timely relief request was not submitted because of oversight which can be partially attributed to an abnormally high workload in the group responsible to take action. Although not timely, submittal of this request at this time does allow for the Commission to provide notice under 10 CFR 91(a)(5). FPL did not delay this submittal in order to create the emergency, or to take advantage of the emergency amendment procedure.

As corrective action to address surveillance scheduling conflicts due to outage schedule changes, the following action will be instituted. A copy of the outage schedule letter prepared by FPL Fuels Department and Nuclear Energy will be sent to the Turkey Point Plant QC Department. The scheduling of surveillances is



addressed in Administrative Procedure 0190.16, Scheduling and Surveillance of Periodic Tests and Checks Required by Technical Specifications, and 0-OSP-200.1, Schedule of Plant Checks and Surveillances. The QC Department, which is responsible for monitoring surveillance schedule dates, will notify the responsible department of the refueling date change. The responsible department would then have ample time to prepare for the surveillance, or to request timely extension of the surveillance period.

On September 30, 1986 FPL submitted a request to upgrade the Turkey Point Plant Technical Specifications. The proposed surveillance period for testing the emergency containment filter system is once per each cycle to be performed during the refueling. This surveillance period would preclude changes to the Technical Specifications due to a change in the outage schedule.

Basis for No Significant Hazards Consideration Determination

The commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for the facility involves no significant hazards consideration if 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, 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.

Operation of Turkey Point Unit 3 in accordance with the proposed amendments would not:

(1) & (2)
Involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident from any previously evaluated because this change does not involve a change in the operation or the physical design of the emergency containment filter system.

(3) Involve a significant reduction in a margin of safety

A one month deferral of the surveillance testing would not significantly increase the risk of unavailability of the system based on the long operating history of these components. When the actual contribution to safety of the filters is considered in light of the recent draft analysis the reduction in the margin of safety associated with the delayed surveillance is negligible.

Based on the above discussion, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety.

Therefore, operation of the facility in accordance with the proposed amendment would pose no threat to the public health and safety, and would not involve a significant hazards consideration.