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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  
 WOODY,C.O. Florida Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
 GRACE,J.N. Region 2, Ofc of the Director

SUBJECT: Provides justification for 880129 request for discretionary enforcement from requirements of Tech Spec 3.0.1.

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L-88-54

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta St., N.W., Suite 2900  
Atlanta, GA 30323

Dear Dr. Grace:

Re: Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251  
Request for Discretionary Enforcement

On January 29, 1988, Florida Power & Light Company (FPL) requested a 24 hour discretionary enforcement from the requirements of Technical Specification (TS) 3.0.1. Following detailed discussions with the NRC Staff, our request was granted and a written justification was requested to document the technical basis for the application of discretionary enforcement. The purpose of this letter is to comply with this request as well as to provide the circumstances which brought this issue to our immediate attention.

On January 27, 1988, a Management on Shift (MOS) observer noted that certain procedure requirements did not seem to be consistent with the Turkey Point TS. The MOS observations were reviewed the next day and an action item was assigned to address the concern. In the course of resolving the concern, a review of instrument surveillance procedures for TS compliance was initiated. This review identified instances where the surveillance procedures for instrument channels would allow the channel to be left in a slightly nonconservative setting. Although the setpoints for these channels were set as close as possible to the TS values, the procedures did allow for a tolerance around the specified value which would allow the channel to be left slightly on the nonconservative side of the TS required value. Our preliminary investigation has determined that one or more of these procedure errors resulted from an incorrect determination that the TS value was a nominal value which allowed application of a tolerance band. Because of the possibility of nonconservative settings, the actual setpoints of the affected channels were reviewed.

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On January 29, 1988 it was preliminarily determined, based on these reviews, that during the last surveillance, four of nine channels of the low low steam generator (SG) level were left slightly below the TS setpoint of greater than or equal to 15%. Because two of these channels affected one SG, the minimum channels operable requirements of TS 3.5.1, Tables 3.5.1 and 3.5.2 could not be met. Because no other action statement is provided for this condition, TS 3.0.1 was entered, necessitating the unit to be in hot standby (mode 3) within 7 hours. At this time, the NRC was contacted regarding the application of discretionary enforcement for the situation.

Justification For Continued Full Power Operation Not to Exceed 24 Hours

FPL determined that a 24 hour extension of TS 3.0.1. is acceptable based on the following reasons:

- 1) Each SG has three level transmitters that feed the reactor protection system and auxiliary feedwater (AFW) initiation logics. The reactor trip and AFW automatic initiation logics for SG low low level is any two out of three channels indicating low low level on one out of three SGs.

The data from the last surveillance showed that three channels were set at 14.975% and one channel was set at 14.95%. The as found settings of two channels on the 4B SG at 14.95% and one channel on the 4A SG at 14.925% fall within the allowable values (greater than or equal to 14%) provided by our NSSS vendor for the proposed upgrade TS. The current TS trip setpoint for SG low low level is greater than or equal to 15%.

- 2) The power range flux - low setting (less than or equal to 25% power) which provides protection during reactor startup can be manually bypassed when two out of four power range channels reach the P-10 setpoint (10% of rated thermal power). During a unit shutdown, three out of four power range channels reaching the P-10 setpoint automatically reinstates the trip function and enables the P-6 permissive to re-energize the source range channels. During normal power operation the power range flux - high setting (109% power, actual setpoint of 108% power) provides the reactor trip protective function on overpower condition. The P-10 permissive does not provide any protective functions during normal power operation.

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One channel (N-42) of the power range P-10 setpoint was indicated to be set slightly higher than the TS limit (10% rated thermal power). The as found value of 10.5% falls within the allowable values provided by our NSSS vendor for the proposed upgrade TS.

- 3) Our current TS do not provide any action statements for this condition. The TS upgrade project submittal for Turkey Point provides action statements that require the setpoint to be readjusted if it exceeds the trip setpoint but is within the "allowable value", thus not requiring the channel to be declared inoperable. These action statements are consistent with the standard technical specifications.

The "allowable value" is a nominal allowance for setpoint drift between calibrations and has been used in several plant specific standard technical specifications.

Based on the above, it is FPL's determination that the 24 hour extension of TS 3.0.1. is justified since the procedures acceptance criteria and the as found values fall within the "allowable value" which our NSSS vendor has determined to be bounded by calculations used in the Turkey Point safety analysis.

Besides the SG level channels and the P-10 setpoint discussed above, three other instruments had surveillance procedures which could have allowed nonconservative settings. Each of these instruments was reviewed to identify the as found condition of the channels. All of these were found to be in compliance with the TS settings.

The following corrective actions were taken:

- The setpoints of the affected channels were rechecked, calibrated and the as found values recorded. This action was completed within 24 hours of entering TS 3.0.1.
- Instructions have been provided to the Instrumentation and Control (I&C) Department to ensure notification of the I&C supervisor prior to any maintenance on the affected instruments.
- The affected procedures which allowed the nonconservative setpoints are being revised to ensure that the acceptance criteria falls within the limits provided in the current TS.

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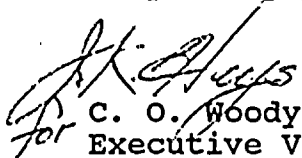
The results of the verification are shown in the attachment.  
The attachment consists of a matrix showing the following:

- 1) Affected Instruments
- 2) Current TS Values
- 3) Precaution, Limitation, and Setpoint Values
- 4) Surveillance procedure acceptance criteria
- 5) NSSS Vendor "Allowable Value"
- 6) As Found Data
- 7) As Left Data

This letter has been reviewed by the Plant Nuclear Safety Committee.

Should you or your staff have any questions on this information, please contact us.

Very truly yours,

  
for C. O. Woody  
Executive Vice President

COW/PLP/JA/gp

Attachments

cc: Document Control Desk, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

PLP/001/MOS

# ATTACHMENT

## INSTRUMENTS SUBJECT TO NONCONSERVATIVE TOLERANCES

<u>Instrument</u>		<u>T.S. Value</u>	<u>PLS</u>	<u>Procedure</u>	<u>NSSS "Allowable Value"</u>	<u>As Found</u>	<u>As Left</u>
S/G Lo-Lo Level	A S/G #474	≥15%	15%	15% ± .25%	≥14%	15.025	15.175
"	B S/G #484	"	"	"	"	14.950	15.175
"	C S/G #494	"	"	"	"	15.000	15.200
"	A S/G #475	"	"	"	"	15.000	15.175
"	B S/G #485	"	"	"	"	14.950	15.175
"	C S/G #495	"	"	"	"	15.025	15.200
"	A S/G #476	"	"	"	"	14.925	15.175
"	B S/G #486	"	"	"	"	15.075	15.200
"	C S/G #496	"	"	"	"	15.050	15.200
Turbine Trip (Auto Stop Oil Pressure)		<45 psig	45 psig	44-46 psig	≥40 psig	45 dec*	45 dec*
Power Range Neutron Flux- Low		≤25%	25%	24-26%	≤26%	≤25%	≤25%
Power Range Neutron Flux Interlock - P-8		≤45%	45%	44-46%	≤46%	≤45%	≤45%
Low Setpoint Neutron Flux Interlock - P-10 N-42		10%	10%	9-11%	≥9%, <11%	10.5%	10%

\* The turbine trip is set to trip at 45 psig and decreasing. The as found value is conservative with respect to the current TS value.

