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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

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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, modifying
 License Condition K to extend effectiveness of license
 conditions to 911231.

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JANUARY 3 1991

L-90-394
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket No. 50-250 and 50-251
Proposed License Amendments
Integrated Schedule

In accordance with 10 CFR 50.90, Florida Power & Light Company (FPL) requests that Facility Operating Licenses DPR-31 and DPR-41 be amended to modify license condition K for Turkey Point Units 3 and 4, respectively, to extend the effectiveness of the license conditions to December 31, 1991. These conditions are now effective to December 31, 1990, subject to renewal by FPL.

FPL has determined that the proposed amendments do not involve a significant hazards consideration pursuant to 10 CFR 50.92. The proposed modified license conditions are shown in Attachment 1. A description of the amendments request is provided in Attachment 2. Attachment 3 provides the basis for a no significant hazards determination in support of the license condition changes.

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

The proposed amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions on this request, please contact us.

Very truly yours,

W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/TCG/RJT/lef

Attachments

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
Mr. Jacob Daniel Nash, Florida Department of Health and
Rehabilitative Services

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an FPL Group company

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

W. H. Bohlke being first duly sworn, deposes and says:


That he is Vice President, Nuclear Engineering and Licensing 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.



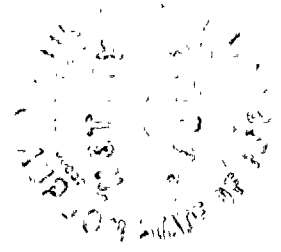
W. H. Bohlke

Subscribed and sworn to before me this
3rd day of January, 1991.



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

My Commission expires _____
Notary Public, State of Florida
My Commission Expires Dec. 26, 1993
Bonded thru PICHARD Ins. Agency





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ATTACHMENT 1

PROPOSED LICENSE AMENDMENT

Marked-up DPR-31/DPR-41
License Condition K

- (iv) Written procedures should be provided to include instructions to require that the channel head area, including the nozzles, be inspected and confirmed to be free of all loose materials, equipment, and tools prior to removing the cover plate from the inflatable plug seal.
- (v) Prior to closing up the reactor coolant system and starting the RCS pumps, any loose debris, including the abrasive grits, in the channel head, RCS hot leg, and cold leg should be cleaned up.
- (vi) Prior to resumption of power operation, the licensee should submit for NRC review and acceptance a report which will include an analysis of the possible effects of any foreign material which has entered the primary coolant system and has not been retrieved. The report should include all work on the decontamination and steam generator repair.
- (i) Sixty days prior to the movement of the used steam generator lower assemblies from the containment, the procedures for the move, associated QA requirements, and a description of the equipment to be used shall be provided to the NRC (3.2.6.).
- (j) Before storage or shipment of the used steam generator lower assemblies, the seal welds must be coated with a heavy bodied varnish such as glyptol (3.2.6).
- (k) If credit for the unplugged configuration of the repaired steam generators is to be taken, a new ECCS analysis using the approved model will be required (3.3.1).

J. Guard Training and Qualification Plan

DELETED

K. Integrated Schedule

- 1. The Plan for Integrated Scheduling of Plant Modifications for Turkey Point Units 3 & 4 (the Plan), submitted on December 19, 1986, is approved.

- a. The Plan shall be followed by the licensee from and after the effective date of this amendment.
 - b. Changes to dates for completion of items identified in Schedule B do not require a licensee amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures. **1991**
2. This license **condition** shall be effective until December 31, **1990**, subject to renewal upon application by the licensee.
- L. The license shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provision of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Turkey Point Plant, Units 3 and 4, Security Plan," with revisions submitted through April 13, 1988; "Turkey Point Plant, Units 3 and 4, Training and Qualification Plan," with revisions submitted through December 18, 1986; and "Turkey Point Plant, Units 3 and 4, Safeguards Contingency Plan," with revisions through July 15, 1985. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
- IV. FPL shall proceed with implementation of the recommendations set forth in paragraphs 7b and c of the "Summary and Conclusions" section of the "Final Environmental Statement Related to Operation of Turkey Point, Florida Power and Light Company, Docket Nos. 50-250 and 50-251," issued July 1972 by the AEC Directorate of Licensing. No later than thirty (30) days from the date of issuance of this license, FPL shall submit to the AEC, for review and approval, its plan for the implementation of such recommendations.
- V. This license is effective as of the date of issuance, and shall expire at midnight April 27, 2007.



- (vi) Prior to resumption of power operation, the licensee should submit for NRC review and acceptance a report which will include an analysis of the possible effects of any foreign material which has entered the primary coolant system and has not been retrieved. The report should include all work on the decontamination and steam generator repair.
- (i) Sixty days prior to the movement of the used steam generator lower assemblies from the containment, the procedures for the move, associated QA requirements, and a description of the equipment to be used shall be provided to the NRC (3.2.6).
- (j) Before storage or shipment of the used steam generator lower assemblies, the seal welds must be coated with a heavy bodied varnish such as glyptol (3.2.6).
- (k) If credit for the unplugged configuration of the repaired steam generators is to be taken, a new ECCS analysis using the approved model will be required (3.3.1).

I. Guard Training and Qualification Plan

DELETED

J. IAEA Safeguards

DELETED

K. Integrated Schedule

1. The Plan for Integrated Scheduling of Plant Modifications for Turkey Point Units 3 & 4 (the Plan), submitted on December 19, 1986, is approved.
 - a. The Plan shall be followed by the licensee from and after the effective date of this amendment.
 - b. Changes to dates for completion of items identified in Schedule B do not require a licensee amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedures.
2. This license condition shall be effective until December 31, 1990, subject to renewal upon application by the licensee.

1991

1991

Attachment 2

Description of Amendment Request:

Amendments 126 and 120 to Facility Operating License Nos. DPR-31 for Turkey Point Unit 3 and DPR-41 for Turkey Point Unit 4, added a license condition which required implementation of Florida Power & Light Company's (FPL) Plan for the Integrated Scheduling of Plant Modifications for Turkey Point Units 3 and 4 (the Plan). The Plan describes the responsibilities of FPL and the Nuclear Regulatory Commission (NRC); provides a summary description of the FPL Integrated Schedule Program; describes the Integrated Schedules; describes the mechanisms for changing the Integrated Schedules; describes the periodic reporting requirements; and describes the mechanism for changing the Plan.

The Integrated Schedule program enables FPL to effectively manage implementation of modifications which are required or proposed by the NRC, as well as other measures which are identified by FPL, to ensure the continued safe, prudent, reliable, and economic operation of the Turkey Point Plant.

This program was developed to coordinate and schedule all necessary work at the Turkey Point Plant, whether mandated by NRC or identified by FPL and others. The program objectives are to: (1) conform to regulatory requirements; (2) provide sufficient lead times for modifications; (3) minimize changes for operators; (4) assure training requirements are fulfilled; (5) effectively manage financial and human resources; and (6) specify the framework for changes to developed schedules.

The program reflects that fiscal and manpower resources are finite and that a limit on the onsite manpower is necessary. The program integrates all planned work at Turkey Point over a nominal five year period to ensure that individual tasks are effectively scheduled and coordinated. It provides a means for new requirements to be accommodated taking into account schedule and resource constraints.

The present license conditions are effective until December 31, 1990, subject to renewal by FPL. FPL would like to extend their effectiveness to December 31, 1991.

ATTACHMENT 3

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The standard used to arrive at a determination that a request for amendment involves no significant hazards consideration are included in the Commission's regulation, 10 CFR 50.92, which states that no significant hazards considerations are involved if the 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. Each standard is discussed as follows:

- (1) 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.

The proposed amendments would provide for the continued implementation of an administrative program to provide for scheduling changes and notification of scheduling changes, and does not affect in any way the design or operation of the plant. The program would continue to enhance plant safety by more effectively controlling the number and scheduling of plant modifications, thereby ensuring that issues required for safe operation of the plant receive priority and are completed in a timely manner.

The use of an Integrated Schedule is consistent with the NRC guidance in Generic Letter 83-20 dated May 9, 1983 and Generic Letter 85-07 dated May 2, 1985.

The administrative changes do not affect assumptions contained in plant safety analyses, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

- (2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The NRC has previously approved the use of an Integrated Schedule at Turkey Point Plant. Additionally, the use of an Integrated Schedule is consistent with the NRC guidance in Generic Letter 83-02 dated May 9, 1983 and Generic Letter 85-07 dated May 2, 1985.

A new or different kind of accident is not created since the proposed amendments would provide for the continued implementation of an administrative program to provide for scheduling changes and notification of scheduling changes, and do not affect in any way the design or operation of the plant. The program would continue to enhance plant safety by more effectively controlling the number and scheduling of plant modifications, thereby ensuring that issues required for safe operation of the plant receive priority and are completed in a timely manner.

Since the proposed amendments will not affect the existing design nor result in any changes to the operational limitations of this plant, the proposed amendments do not create the possibility of a new or different kind of accident from any accident previously evaluated

- (3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The proposed amendments would provide for the continued implementation of an administrative program to provide for scheduling changes and notification of scheduling changes, and do not affect in any way the design or operation of the plant. The program would continue to enhance plant safety by more effectively controlling the number and scheduling of plant modifications, thereby ensuring that issues required for safe operation of the plant receive priority and are completed in a timely manner.

The use of an Integrated Schedule is consistent with the NRC guidance in Generic Letter 83-20 dated May 9, 1983 and Generic Letter 85-07 dated May 2, 1985.

The changes being proposed do not relate to or modify the safety margins defined in and maintained by the Technical Specifications. Therefore, the proposed changes would not involve any reduction in a margin of safety.

Based on the above, we have determined that the amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (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; and therefore does not involve a significant hazards consideration.

