

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9106040011 DOC.DATE: 91/05/28 NOTARIZED: YES DOCKET #  
 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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 BOHLKE,W.H. Florida Power & Light Co. *See Report*  
 RECIP.NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising  
 Tech Specs to remove outdated matl, incorporate  
 administrative clarifications & correct typos for  
 consistency w/NUREG-0452 re STS for Westinghouse PWRs.

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**FPL**

P.O. Box 14000, Juno Beach, FL 33408-0420

MAY 28 1991

L-91-142  
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 Nos. 50-250 and 50-251  
Proposed License Amendment  
Administrative Update - 1991

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) submits a request to amend Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Units 3 and 4, respectively.

The purpose of this amendment is to revise the Technical Specifications to achieve consistency throughout this document by (a) removing outdated material, (b) incorporating administrative clarifications, and (c) correcting typographical errors. Comparisons have been made with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Revision 4, and changes are requested to ensure consistency with this document.

FPL has determined that the proposed license amendment does not involve a significant hazard pursuant to 10 CFR 50.92. A description of the amendment request is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specification change is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specification changes.

In accordance with 10 CFR 50.91 (b) (1), a copy of this Proposed License 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 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/RJT/rjt

Attachments

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L-91-142

Page 2

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

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

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

That he is Vice President, Nuclear Engineering and Licensing, of Florida Power and Light Company, the Licensee herein;

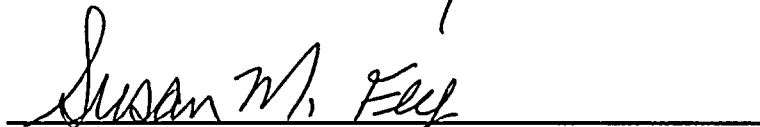
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



\_\_\_\_\_  
W. H. Bohlke

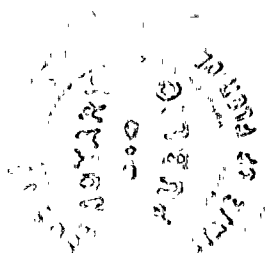
Subscribed and sworn to before me this

28<sup>th</sup> day of May, 1991.



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

My Commission expires: Notary Public, State of Florida  
My Comm. Exp. Feb. 18, 1995  
Bonded thru RICHARD Ins. Agency,



ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUEST

9106040011

### DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment revises the Turkey Point Units 3 and 4 Technical Specifications to achieve consistency throughout the Technical Specifications by (a) removing outdated material, (b) incorporating administrative clarifications, and (c) correcting typographical errors.

These changes represent an administrative update to the Turkey Point Units 3 and 4 Technical Specifications. Each of the proposed changes are discussed below:

#### TS 1.0 - Definitions

1) Item: Page 1-2

Action: TS 1.7 a.2), delete reference to Table 3.6-1

Discussion: TYPOGRAPHICAL ERROR - Table 3.6-1 does not exist in the Technical Specifications. Specification 3.6.4 meets the intention of the exception statement.

#### TS 2.0 - Safety Limits and Limiting Safety System Settings

1) Item: Page 2-10

Action: Table 2.2-1,  $K_6$  definition, delete the words "and  $K_6$ ", and move the portion of the definition " $= 0$  for  $T \leq T$ ," to the following line

Discussion: ADMINISTRATIVE CLARIFICATION - This expression was modified to ensure a consistent mathematical convention.

#### TS 3/4.1 - Reactivity Control Systems

1) Item: Page 3/4 1-23

Action: TS 4.1.3.3.2, delete the sentence "A CHANNEL CHECK CALIBRATION AND ANALOG CHANNEL OPERATIONAL TEST shall be performed per Table 4.1-1." Substitute the wording "OPERABILITY of the group step counter demand position indicator shall be verified in accordance with Table 4.1-1."



TS 3/4.1 - Reactivity Control Systems (Cont.)

Discussion: ADMINISTRATIVE CLARIFICATION - Table 4.1-1 establishes operability of the group step counter demand position indicator by performing a CHANNEL CHECK and an OPERATIONAL TEST. The demand position indicator system is a digital system and does not have channels to calibrate or perform an analog operational test. This change is consistent with the surveillance requirements of Table 4.1-1.

2) Item: Page 3/4 1-23

Action: TS 3.1.3.3, Footnote (\*\*) - change the reference from Special Test Exceptions Specification 3.10.4 to Special Test Exceptions Specification 3.10.5

Discussion: TYPOGRAPHICAL ERROR - Special Test Exceptions Specification 3.10.4 does not exist. Reference to Specification 3.10.4 was incorrect and more appropriately applies to Specification 3.10.5.

TS 3/4.3 - Instrumentation

1) Item: Page 3/4 3-15

Action: Table 3.3-2, 1.f., Steam Generator Pressure-- Low, substitute the words "generator" and "generators" for the words "line" and "lines", respectively

Discussion: ADMINISTRATIVE CLARIFICATION - The Steam Generator Low Pressure System actuation signal is monitored with one channel per steam generator. The CHANNELS TO TRIP and the MINIMUM CHANNELS OPERABLE are established based upon the operability of this one channel per steam generator. Substitution of the word "generator(s)" for the word "line(s)" is made to ensure a consistent interpretation of the operability criteria based upon the total number of channels per steam generator. This change is consistent with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Revision 4.



TS 3/4.3 - Instrumentation (Cont.)

2) Item: Page 3/4 3-18

Action: Table 3.3-2, functional unit 4.d., Steam Line Flow - High, insert the wording "in any two steam lines" under the columns CHANNELS TO TRIP and MINIMUM CHANNELS OPERABLE. For the Steam Generator Pressure - Low, substitute the word "generators" for the word "lines" under the column headings CHANNELS TO TRIP and MINIMUM CHANNELS OPERABLE.

Discussion: ADMINISTRATIVE CLARIFICATION -The Steam Line High Flow system protection is based upon the presence of 2 channels per steam line. A review of NUREG-0452, confirms the logic for the CHANNELS TO TRIP is based upon the operability of 1 channel per steam line in any two steam lines. The addition of the wording "in any two steam lines", ensures consistency with this NUREG.

The Steam Generator Low Pressure system protection is based upon the presence of 1 channel per steam generator. Substituting the word "generators" for the word "lines" is used to ensure consistent terminology between the column heading TOTAL NO. OF CHANNELS and the columns identified as CHANNELS TO TRIP and MINIMUM CHANNELS OPERABLE.

3) Item: Page 3/4 3-26

Action: Table 3.3-3, change the letter "f" in 4.f. to the letter "d"

Discussion: TYPOGRAPHICAL ERROR - A review of NUREG-0452, confirms that no information was unintentionally deleted and that this change is simply a typographical correction.



TS 3/4.3 - Instrumentation (Cont.)

4) Item: Page 3/4 3-36

Action: Table 3.3-4, insert the word MINIMUM in the heading CHANNELS OPERABLE, and add the word "for" between the words "27" and "MODES" in Functional Unit 1.a., Containment Atmosphere Radioactivity - High

Discussion: TYPOGRAPHICAL ERROR - Inserting the word "MINIMUM" in the column heading CHANNELS OPERABLE, ensures a consistency with ACTION statements 27 and 28 of Table 3.3-4. The addition of the word "for", provides a clarification of the applicability of ACTION statement 27 for Modes 5 and 6.

5) Item: Page 3/4 3-43

Action: Table 3.3-5, insert the word "quadrant" after the word "core" under the column MINIMUM CHANNELS OPERABLE for Instrument 14, In Core Thermocouples (Core Exit Thermocouples)

Discussion: TYPOGRAPHICAL ERROR - The addition of the word "quadrant" is requested to ensure consistency with the definition for the TOTAL NO. OF CHANNELS for instrument 14. This wording is identical to the wording in Table 3.3-10 of NUREG-0452, Rev. 4, Standard Technical Specifications for Westinghouse Pressurized Water Reactors.

6) Item: Page 3/4 3-48 and 3/4 3-49

Action: Table 3.3-6, under the column heading TOTAL NUMBER OF INSTRUMENTS - add the asterisk to the expression "(x/y)" so that the heading reads "(x/y)\*" for the HEAT, FLAME and SMOKE instruments. Under TABLE NOTATIONS, delete the expression "(x/y)" and center the location of the asterisk.



TS 3/4.3 - Instrumentation (Cont.)

- Discussion:       TYPOGRAPHICAL ERROR - The definition for (x/y) is identical for the three types of instruments (heat, flame, and smoke) and was never intended to be distinguished as any different. Adding the asterisk for each instrument, ensures the correct and identical definition for each type of fire detection instrument.
- 7)   Item:       Page 3/4 3-53
- Action:       Table 4.3.5, delete the asterisk ("\*") footnote, which states that the "Channel calibration frequency shall be at least once per 18 months", since the definition for "R" as defined in Table 1.1 is identical.
- Discussion:       ADMINISTRATIVE CLARIFICATION - Deleting the asterisk footnote, while maintaining the notation "R", reduces redundancy, while maintaining consistency within the Technical Specifications.
- 8)   Item:       Page 3/4 3-53
- Action:       Table 4.3.5, TABLE NOTATIONS (1), second line, substitute the word "measured" for the word "measures"
- Discussion:       TYPOGRAPHICAL ERROR - Syntactical change
- 9)   Item:       Page 3/4 3-53
- Action:       TABLE NOTATIONS (2) - change the reference standards certifier name of "National Bureau of Standards (NBS)" to "National Institute of Standards and Technology (NIST)"
- Discussion:       ADMINISTRATIVE CLARIFICATION - This clarification reflects a change in the title of a government agency.

TS 3/4.3 - Instrumentation (Cont.)

10) Item: Page 3/4 3-56

Action: Table 3.3-8, 4.d. editorial change, move the values under the three columns over several spaces to line-up with the values in Table 3.3-8.

Discussion: TYPOGRAPHICAL ERROR - Strictly editorial

11) Item: Pages 3/4 3-59 and 3-61

Action: Table 4.3-6, delete footnote "(6)" on Page 3/4 3-61 and substitute "R" for "(6)" under the column heading CHANNEL CALIBRATION for Instrument 4.a., 4.d., and 4.e. on Page 3/4 3-59.

Discussion: ADMINISTRATIVE CLARIFICATION - This change reduces the redundancy, since the definition for "R" as provided in Table 1.1 is identical to the definition for "(6)" as defined in Table 4.3.6.

12) Item: Page 3/4 3-60

Action: TABLE NOTATIONS (3) - change the reference standards certifier name of "National Bureau of Standards (NBS)" to "National Institute of Standards and Technology (NIST)"

Discussion: ADMINISTRATIVE CLARIFICATION - This clarification reflects a change in the title of a government agency.

TS 3/4.4 - Reactor Coolant System

1) Item: Page 3/4 4-22

Action: Table 3.4-1, Unit 3 valve should read "3-876A", as opposed to "3-876-A". Reactor Coolant System Pressure Isolation Valves MOV3-750 and MOV3-751 are incorrectly listed as valves in the Loop A hot leg to RHR. These valves are actually located in the Loop C hot leg to the RHR. Revise Table 3.4-1, to reflect the correct location of MOV3-750 and MOV3-751.





TS 3/4.4 - Reactor Coolant System (Cont.)

Discussion: ADMINISTRATION CLARIFICATION - This change is requested to ensure accuracy with the plant configuration. For each unit, the RCS pressure isolation valve is located on at least one hot leg to the RHR. TS 3.4.6.2 e. states that RCS leakage shall be limited to a maximum of 5 GPM from any Reactor Coolant System Pressure Isolation valve. This change identifies the actual loop the Unit 3 MOV valves in the hot leg to the RHR are located, without compromising the system protection.

2) Item: Page 3/4 4-28

Action: Table 4.4-4, substitute the word "AND" for the word "ANY" in the column heading "TYPE OF MEASUREMENT ANY ANALYSIS".

Discussion: TYPOGRAPHICAL ERROR - Correction to ensure accuracy and consistency with NUREG-0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors, Rev. 4.

TS 3/4.6 - Containment Systems

1) Item: Page 3/4 6-10

Action: TS 4.6.1.6.3, fifth line down change the reference from Technical Specification "4.6.1.2.1", to "4.6.1.2", deleting the last number ".1"

Discussion: TYPOGRAPHICAL ERROR - TS 4.6.1.2.1. does not exist in the Technical Specifications. Eliminating the ".1", at the end of this specification, ensures that the intent of this cross-reference is maintained.

2) Item: Page 3/4 6-15

Action: TS 4.6.3 b.2), insert a period between "6" and "a" in the expression "criteria of position C.6a"

Discussion: TYPOGRAPHICAL ERROR



TS 3/4.7 - Plant Systems

1) Item: Page 3/4 7-33

Action: TS 3.7.9, relocate the wording "fire barrier penetration seals" from an example of "fire rated assemblies" to an example of "all sealing devices in fire rated assembly penetrations"

Discussion: ADMINISTRATION CLARIFICATION - TS 4.7.9.1 states that at least once per 18 months the required fire rated assemblies and penetration sealing devices shall be verified OPERABLE. The surveillance requirement differentiates the extent of the inspection based upon the category of the equipment (i.e., fire rated assemblies versus penetration sealing devices). By substituting the wording "fire barrier penetration seals" as an example of sealing devices in fire rated assembly penetrations, the SURVEILLANCE REQUIREMENTS are consistent with the intent of specification 3.7.9.

TS 3/4.9 - Refueling Operations

1) Item: Page 3/4 9-12

Action: TS 3.9.11, Delete the asterisk footnote, which reads "During spent fuel rerack operation, the water level may be lowered to a level justified by an engineering safety evaluation. There will be no movement of fuel assemblies with water level lower than 56' - 10" elevation during rerack operation." Also delete the asterisk in the second line of TS 3.9.11. Change all double asterisk notations to a single asterisk notation.

Discussion: ADMINISTRATION CLARIFICATION - This footnote is no longer applicable, since both Turkey Point Units 3 and 4 spent fuel pools have been reracked with two region high-density spent fuel storage racks.

TS 3/4.9 - Refueling Operations (Cont.)

2) Item: Page 3/4 9-13

Action: Substitute the Technical Specification number "4.9.12.3" for the number "4.8.12.3"

Discussion: TYPOGRAPHICAL ERROR - The number "8" was inadvertently substituted for the number "9", in the specification number.

3) Item: Page 3/4 9-13

Action: TS 3.9.12, Delete the asterisk footnote, which reads "The spent fuel cask can be moved into the Unit 4 spent fuel pit after a minimum decay of 1000 hours until the new two-region high density spent fuel racks are installed." Also delete the asterisk in TS 3.9.12 1).

Discussion: ADMINISTRATIVE CLARIFICATION - This footnote is no longer applicable, since both Turkey Point Units 3 and 4 spent fuel pools have been reracked with two-region high density spent fuel storage racks.

4) Item: Page 3/4 9-15

Action: TS 3/4.9.14, Spent Fuel Storage, is modified to reflect the fact that Turkey Point Units 3 and 4 spent fuel pools have been reracked with two-region high density spent fuel storage racks. The following changes are requested:

(a) Delete the wording in TS 3.9.14 a., which reads "Fuel Assemblies containing more than 4.1 weight percent of U-235 shall not be placed in the single region spent fuel storage racks. After installation of the two region high density spent fuel racks,..."

(b) Delete TS 3.9.14 d.,

(c) Substitute in ACTION statement a., the wording "either condition a or c", for the wording "any of conditions a, c or d" and,



TS 3/4.9 - Refueling Operations (Cont.)

- (d) Delete the asterisk footnote, which reads "These requirements are applicable only after installation of the new two-region high density spent fuel racks". Also delete the asterisk in TS 3.9.14 c.

Discussion: ADMINISTRATIVE CLARIFICATION - These changes are no longer applicable, since both Turkey Point Units 3 and 4 spent fuel pools have been reracked with two-region high density spent fuel storage racks.

5) Item: Page 3/4 9-15

Action: TS 3.9.14 a., substitute the wording "not exceed" for the word "be"

Discussion: ADMINISTRATIVE CLARIFICATION - The intention of this specification is to establish an upper-limit on the fuel assembly enrichment in the spent fuel pool. The insertion of this wording ensures a consistent interpretation for the LCO for the spent fuel storage racks and does not change the actual enrichment limit.

TS 3/4.11 - Radioactive Effluents

1) Item: Page 3/4.11-15

Action: TS 4.11.2.5, substitute the reference to "Table 3.3-8 of Specification 3.3.3.7" to "Table 3.3-8 of Specification 3.3.3.6". Also in the asterisk footnote, change the reference from "Table 3.3-9" to "Table 3.3-8".

Discussion: ADMINISTRATIVE CLARIFICATION - Corrections made to ensure compliance with the appropriate specifications. Both TS 3.3.3.7 and Table 3.3-9 do not exist in the Technical Specifications. TS 3/4.11.2.5 applies to the GAS DECAY TANK SYSTEM, while TS 3.3.3.6 applies to "Radioactive Gaseous Effluent Monitoring Instrumentation", and therefore the correct cross-reference is TS 3.3.3.6.

TS 3/4.11 - Radioactive Effluents (Cont.)

The asterisk footnote provided on Pg. 3/4 11-15, addresses the inoperability of the continuous monitoring capability for concentrations of hydrogen and oxygen. ACTION statement 49, in Table 3.3-8, clearly addresses this condition.

TS 3/4.12 - Radiological Environmental Monitoring

1) Item: Page 3/4 12-2

Action: TS 3.12.1, ACTION statement c, substitute the wording "broad leaf" for the wording "fresh leafy"

Discussion: ADMINISTRATIVE CLARIFICATION - The correct terminology is "broad leaf", as used in Table 3.12-1 and the associated TABLE NOTATION (11). This substitution ensures consistency within the reporting requirements.

Bases for Section 3.0 and 4.0

1) Item: Page B 3/4 9-4

Action: Delete footnote "\*" and the corresponding asterisk in the text

Discussion: ADMINISTRATIVE CLARIFICATION - This footnote is no longer required, since the actual configuration of the Turkey Point Units 3 and 4 spent fuel pool is the two region high density spent fuel racks. As a result, the statement which referenced this footnote is governed by Technical Specifications.





TS 5.0 - Design Features

1) Item: Page 5-5

Action: TS 5.6.1, Criticality, is modified to reflect the fact that the Turkey Point Units 3 and 4 spent fuel pool was reracked with two-region high density spent fuel storage racks. The following changes are requested:

- (a) Delete TS 5.6.1.1 a. and 5.6.1.1 d.,
- (b) TS 5.6.1.1 c., delete the first sentence which reads "A nominal 13.7 inch center-to-center distance between fuel assemblies placed in the single-region storage racks.", and
- (c) TS 5.6.1.1 e., delete the beginning of the first sentence which reads "After installation of the two-region high density spent fuel storage racks,...".

Discussion: ADMINISTRATIVE CLARIFICATION - These Technical Specifications can be deleted, since both Turkey Point Units 3 and 4 spent fuel pools have been reracked with two-region high density spent fuel storage racks and the reference to the "single region spent fuel storage racks" is no longer applicable.

2) Item: Page 5-6

Action: TS 5.6.1.3, delete the asterisk footnote, which reads "During rack installation, it will be necessary to temporarily store Region I fuel in the Region II spent fuel racks. Administrative controls will be utilized to maintain a checkerboard storage configuration, i.e., alternate cell occupation, in the Region II racks." Also, delete the asterisk in the second line of TS 5.6.1.3.

Discussion: ADMINISTRATIVE CLARIFICATION - This footnote can be deleted, since both Turkey Point Units 3 and 4 spent fuel pools have been reracked with two-region high density spent fuel storage racks. Reference to the "temporary storage of Region I fuel in the Region II spent fuel racks" is no longer applicable.



TS 5.0 - Design Features (Cont.)

3) Item: Page 5-6

Action: TS 5.6.3, delete the statement "... 621\*\* fuel assemblies in one region storage racks or..". Also, delete footnote "\*\*\*".

Discussion: ADMINISTRATIVE CLARIFICATION - The statement and footnote can be deleted, since both Turkey Point Units 3 and 4 spent fuel pools have been reracked with two-region high density spent fuel storage racks and the reference to the maximum number of fuel assemblies in one region storage racks is no longer applicable.

TS 6.2 - Organization

1) Item: Page 6-1

Action: TS 6.2.1 a., third line, change the wording from "intermediate levels to an including" to the wording "intermediate levels to, and including". ( A comma is added between the words "to" and "and".)

Discussion: TYPOGRAPHICAL CLARIFICATION - This change clarifies the intention of the lines of authority, responsibility and communication.

2) Item: Page 6-7

Action: TS 6.5.1.7 b., third line, insert "-", between the words "Manager" and "Nuclear", such that the wording reads "Plant Manager - Nuclear"

Discussion: TYPOGRAPHICAL ERROR - This correction is made to ensure a consistence within Technical Specification 6.0.



TS 6.2 - Organization (Cont.)

- 3) Item: Page 6-14 and 6-15
- Action: TS 6.8.4, move the title "c. Secondary Water Chemistry" from the top of Page 6-15 to the bottom of Page 6-14.
- Discussion: TYPOGRAPHICAL ERROR - Move the title to maintain consistence with the implied intention. This change parallels NUREG 0452, Rev. 4, Standard Technical Specifications for Westinghouse Pressurized Water Reactors.
- 4) Item: Page 6-17
- Action: Add an asterisk to the heading "ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT". In the fourth paragraph, second line, add an additional asterisk to the asterisk after the words "two legible maps".
- Discussion: TYPOGRAPHICAL ERROR - This change is to ensure consistency between the footnotes and the statements associated with the asterisks.
- 5) Item: Page 6-22
- Action: Change the page heading "RECORD RETENTION" to read "RADIATION PROTECTION PROGRAM".
- Discussion: TYPOGRAPHICAL ERROR - This change is consistent with Technical Specification conventions and the section name on the bottom of Page 6-21.

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION





DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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 a 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. FPL has determined that 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.

The changes being proposed are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, 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) create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed are administrative in nature and will not lead to material procedure changes or to physical modifications to the facility. Therefore, the proposed changes do not create the possibility of a new or different kind of accident.

- (3) involve a significant reduction in a margin of safety.

The changes being proposed are administrative in nature and 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, FPL has determined that the proposed amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the probability 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 as defined in 10 CFR 50.92.

