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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, revising surveillance requirement on battery chargers.

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JULY 2 1991

L-91-190
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: D.C. Sources - Battery Chargers

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to modify Turkey Point Units 3 and 4 Technical Specification Section 3/4.8.2, D.C. Sources. The purpose of this amendment is to revise the surveillance requirement on the battery chargers.

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 change.

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.

As a part of the Emergency Power System Enhancement Project, FPL procured eight new battery chargers. During the pre-operational testing phase performed in late June 1991, FPL determined that under low load conditions the battery chargers will not consistently share load within the Technical Specifications surveillance limit. An evaluation has concluded that the proposed revision of the surveillance method for battery chargers ensures FPL's ability to verify battery charger operability.

Please note that battery charger operability is required prior to Turkey Point Unit 3's entry into Mode 4, which is presently scheduled for September 3, 1991.

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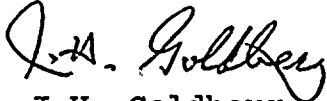
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Should there be any questions on this request, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J.H. Goldberg".

J.H. Goldberg
President
Nuclear Division

JHG/RJT/rjt

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

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

J. H. Goldberg being first duly sworn, deposes and says:

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

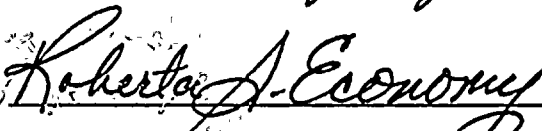
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



J. H. Goldberg

Subscribed and sworn to before me this

2 day of July, 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 June 1, 1993
Bonded Thru Troy Fain - Insurance Inc.

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ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUEST

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The proposed amendment revises the Turkey Point Technical Specifications to reflect results from the pre-operational testing of the new battery chargers which were installed as part of the Emergency Power System (EPS) Enhancement Project. During the pre-operational testing phase, FPL determined that under low load conditions the battery chargers will not consistently load share within 10% of their rating. The Turkey Point D.C. bus system consists of four (4) D.C. buses shared between two units. With one unit in Modes 5 or 6, one or more of the D.C. buses may have reduced load and the associated battery chargers may not be sharing the load within 10%.

The proposed amendment revises the surveillance requirement for the battery chargers. Technical Specification 4.8.2.1.a.2 will be modified as follows:

Present Technical Specification -

- 2) The total battery terminal voltage is greater than or equal to 129 volts on float charge and the battery charger(s) output voltage is ≥ 129 volts, and if two battery chargers are connected to the battery bank, the battery charger currents do not differ from each other by more than 10% of the battery charger rating.

Proposed Technical Specification -

- 2) The total battery terminal voltage is greater than or equal to 129 volts on float charge and the battery charger(s) output voltage is ≥ 129 volts, and
- 3) If two battery chargers are connected to the battery bank, verify each battery charger is supplying a minimum of 10 amperes, or demonstrate that the battery charger supplying less than 10 amperes will accept and supply the D.C. bus load independent of its associated battery charger.

Turkey Point Technical Specification 3.8.2.1 requires a minimum of one battery charger per bus supplied from a separate 480 volt Motor Control Center (MCC), but permits two battery chargers on each D.C. bus. Normal alignment consists of two battery chargers per D.C. bus.

Standard Technical Specifications require only that the D.C. voltage be verified to be greater than 129 volts and does not address enhanced configurations of more than one battery charger per D.C. bus. Since Turkey Point operates with two battery

chargers per D.C. bus, an additional surveillance requirement was added in Amendments 138 and 133 to verify that both battery chargers are operable. The method selected was verification that the battery chargers were sharing load within 10%. However, even though the load sharing may exceed the 10% load variation, each charger is still capable of providing the required design output current. Battery charger load sharing is not required for the safety related function of the chargers for Turkey Point and therefore, verification of charger current and voltage is a more appropriate determination of battery charger operability. The 10 ampere requirement represents the minimum current which can be readily observed to establish operability.

Under normal operating conditions, each battery charger is expected to supply loads in excess of 10 amperes. Consequently, verification of a battery charger's ability to supply a minimum of 10 amperes is expected to be the normal method of verifying battery charger operability. Testing which ensures the ability of one battery charger to supply the normal operating D.C. bus load upon loss of the associated battery charger has been performed.

Deleting the requirement for battery charger load sharing within 10% does not alter the capability to detect any battery charger failures which would prevent the performance of its safety related function.

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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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 in accordance with the proposed amendment would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not revise or alter the minimum equipment requirements nor any plant operating parameters. The revised surveillance requirement relating to the battery chargers during two chargers per D.C. bus operation, will ensure the ability to verify battery charger operability. Battery charger load sharing is not required for the safety related function of the chargers for Turkey Point and verification of charger current and voltage is a more appropriate determination of battery charger operability. Deleting the requirement for battery charger load sharing within 10% does not alter the capability to detect any battery charger failures which would prevent the performance of its safety related function. This change does not affect assumptions contained in plant safety analyses or the physical design of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed change does 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 proposed change does not involve the addition of any new type of equipment or create any new modes or changes in operation. Battery charger load sharing is not required for the safety related function of the chargers for Turkey Point and verification of charger current and voltage is a more appropriate determination of battery charger operability. Deleting the requirement for battery charger load sharing within 10% does not alter the capability to detect any battery charger failures which would prevent the performance of its safety related function.

The proposed change ensures the ability of the battery chargers to provide the appropriate charging capability and ensures that



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the operability requirements of TS 3.8.2.1 are met. This change does not affect any safety analysis assumptions, or physical modifications to the facility. Therefore, the proposed change does not create the possibility of a new or different kind of accident.

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

The proposed change presents a revised method to verify or demonstrate as appropriate, that the battery chargers are operating correctly. This method ensures the operability requirements of TS 3.8.2.1 are met, without compromising the safety margin defined in, and maintained by, the Technical Specifications. Therefore, the proposed amendment does not involve a significant reduction in the 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.