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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

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RECIP. NAME RECIPIENT AFFILIATION Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, modifying TS 3/4.2.1, "Axial Flux Difference" & adding TS 6.9.1.7, "COLR" & associated bases to reflect implementation of COLR per recommendations in GL 88-16.

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FPL

P.O. Box 029100, Miami, FL, 33102-9100

APR 23 1993

L-93-092
10 CFR 50.36
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 Amendments
Implementation of Relaxed Axial Offset Control (RAOC) and
Core Operating Limits Report

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 3/4.2.1, Axial Flux Difference, and add Technical Specification 6.9.1.7, Core Operating Limits Report and their associated bases and definitions. The proposed revision to the Technical Specifications include (a) changing the Axial Flux Difference (AFD) control methodology in Technical Specification 3/4.2.1 from Constant Axial Offset Control (CAOC) to Relaxed Axial Offset Control, (b) relocating the AFD cycle-specific core operating limits from the Technical Specifications to the Core Operating Limits Report (COLR) and (c) incorporating editorial changes. The implementation of a Core Operating Limits Report is performed in accordance with the recommendations of Generic Letter 88-16.

A safety analysis of the amendments request is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazard pursuant to 10 CFR 50.92. 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. Attachments 4 and 5 provides the proposed Core Operating Limits Report for Turkey Point Units 3 and 4, respectively.

In accordance with 10 CFR 50.91 (b)(1), a copy of these proposed license amendments are 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,

T. F. Plunkett
Vice President
Turkey Point Nuclear Plant

TFP/RJT/rt
Attachments

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PDR

an FPL Group company

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L-93-092

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC
R. C. Butcher, Senior Resident Inspector, USNRC, Turkey Point
W. A. Passetti, Florida Department of Health and Rehabilitative
Services

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1914

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

That he is Vice President, Turkey Point Nuclear Plant, of Florida Power and Light Company, the Licensee herein;

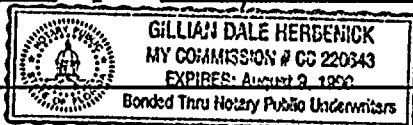
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



T. F. Plunkett

Subscribed and sworn to before me this

23 day of April, 1993.



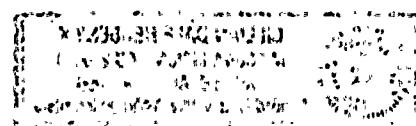


Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of
Dade, State of Florida

My Commission expires _____
Commission No. _____

T. F. Plunkett is personally known to me.



ATTACHMENT 1

SAFETY ANALYSIS

SAFETY ANALYSIS

Introduction

Generic Letter 88-16, dated October 4, 1988, was issued to encourage licensees to amend the Technical Specifications related to cycle-specific parameters. These Technical Specification changes will relocate cycle-specific parameter limits from the Technical Specifications to the Core Operating Limits Report (COLR). Presently, the parameter limits for Turkey Point Units 3 and 4 are calculated using NRC approved methodologies. These limits are evaluated for every reload cycle and may be revised by a license amendment as appropriate, to reflect changes to cycle-specific variables.

The generic letter provided guidance for relocation of certain cycle-dependent core operating limits from a licensee's Technical Specifications to the COLR. This would allow changes to the values of the core operating limits without prior NRC approval (i.e. license amendment), as long as an NRC approved methodology for the parameter limit calculation is followed.

The Axial Flux Difference (AFD or ΔI) requirements will be removed from the Technical Specifications as described above. The Constant Axial Offset Control (CAOC) methodology will be replaced by the Relaxed Axial Offset Control (RAOC) methodology which merely requires the AFD to be maintained within the allowed operations band as a function of power. This (allowed operating space) becomes the Technical Specifications. If the AFD limits are exceeded, the condition is alarmed, the AFD must be returned within 15 minutes or power must be reduced. The surveillance requirement, which is similar to other alarmed limits, discusses the verification frequency of AFD as a function of alarm status. Also, a Base Load operation option will be added to conform to the requirements of Specification 4.2.2.3.

Power Distribution Control Methodologies

The following discussion briefly describes the current and proposed methodology for axial power distribution control for Turkey Point Units 3 and 4.

1. Constant Axial Offset Control (CAOC)

Axial Power Distribution Control at the Turkey Point Units 3 and 4 is currently achieved by Constant Axial Offset Control (CAOC). This methodology is described in reference 1. This method assures that the peaking factors and the Departure from Nucleate Boiling Ratio (DNBR) limit remain bound by the accident analysis limits. The CAOC strategy documented in the

reference 1 topical report maintains the axial power distribution within a $\pm 5\%$ AFD band around a measured target value during normal plant operation (including power change maneuvers). By controlling the axial power distribution, the possible skewing of the axial xenon distribution is limited, thus minimizing xenon oscillations and their effects on the power distribution.

2. Relaxed Axial Offset Control (RAOC)

The development of the Relaxed Axial Offset Control (RAOC) methodology is documented in reference 2. This strategy was developed to provide wider control bands and more operating flexibility than with CAOC. The RAOC methodology provides wider control bands at reduced power by utilizing core margin efficiently. The RAOC methodology improves plant availability and operating flexibility by increasing the AFD operating envelope. This flexibility provides the following benefits:

- a. Allows the operator to minimize and/or smooth the boron system duty relative to CAOC.
- b. Reduces control rod motion and hence operator action required to maintain conformance with power distribution control Technical Specifications.
- c. Increases the ability to return to power after a plant trip.

Discussion

The proposed revision to the Technical Specifications changes the AFD control methodology from CAOC to RAOC and relocates the AFD cycle-specific core operating limits from the Technical Specifications to the COLR. RAOC is the methodology developed for Westinghouse plants which allows AFD operation over a fixed wide range in AFD between 100% and 50% power with no limits below 50%. In contrast with the CAOC methodology, RAOC does not include penalty points accumulation (i.e. one penalty point for every minute that AFD is outside the target band above 50% power and one half penalty point for every minute AFD is outside the target band below 50% but above 15% power).

The proposed changes to the Technical Specifications consist of the following:

1. The AFD requirements are modified to conform with those of RAOC.
2. The AFD Technical Specification is modified to note that

cycle-specific limits are contained in the COLR.

3. The AFD for Base Load operation is included to be consistent with Specification 4.2.2.3.
4. The BASES Section of the Technical Specifications for AFD surveillance is changed to reflect the new RAOC methodology.
5. Consistent with Generic Letter 88-16, a COLR subsection is added to the Administrative Controls Section of the Technical Specifications which specifies the timetable of the COLR submittal. The actual COLR report will be required to be submitted to the NRC within 30 days after plant startup or parameter limit revision to allow continued trending of cycle-specific parameters.
6. Minor editorial changes to the INDEX and Section 1.0, DEFINITIONS.

Proposed Technical Specifications Changes

FPL proposes to change the following Technical Specifications in support of the proposed amendments:

1. Technical Specifications INDEX - DEFINITIONS (pg. ii): add the following section titles to the INDEX and revise the page numbers as appropriate.

- 1.37 Digital Channel Operational Test
- 1.38 Core Operating Limits Report

Justification: This proposed change is editorial in nature and is revised to ensure consistency within Turkey Point's Technical Specifications. Reference to Section 1.37 was inadvertently left off of the INDEX for the DEFINITIONS. The proposed amendments do not involve any changes to the DEFINITION of Digital Channel Operational Test.

2. Technical Specifications INDEX - LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS (pg. v): delete the title "FIGURE 3.2-1 AXIAL FLUX DIFFERENCE LIMITS AS A FUNCTION OF RATED THERMAL POWER" and the corresponding page number.

Justification: This proposed change is editorial in nature and is made to ensure consistency with the recommendations of Generic Letter (GL) 88-16. GL 88-16 was issued specifically to encourage licensees to amend the Technical Specifications related to cycle specific parameters. These Technical Specification changes will relocate cycle-specific parameter

limits (i.e., Axial Flux Difference Limits) from the Technical Specifications to the Core Operating Limits Report (COLR).

3. Technical Specifications INDEX - ADMINISTRATIVE CONTROLS (pg. xxiii): insert the title "Core Operating Limits Report" and the corresponding page number.

Justification: This proposed change is editorial in nature and is made to ensure consistency with the recommendations of Generic Letter 88-16, which states that new administrative reporting requirements shall be added to the existing reporting requirements of the Technical Specifications.

4. Technical Specification 1.38: add the DEFINITION "CORE OPERATING LIMITS REPORTS" as provided in INSERT 1 of Attachment 3

Justification: The proposed change adds the definition of "CORE OPERATING LIMITS REPORT" to be consistent with the recommendations of Generic Letter 88-16.

5. Technical Specification Table 1.1 and 1.2: revise the page numbers

Justification: This proposed change is editorial in nature and is made to ensure consistency within Turkey Point's Technical Specifications. Specifically by adding the DEFINITION for CORE OPERATING LIMITS REPORT the numerical sequence of page numbers are altered.

6. Technical Specification 3.2.1: revise the LIMITING CONDITION FOR OPERATION (LCO) for the Technical Specification on Axial Flux Difference (AFD) to conform to (a) the Relaxed Axial Offset Control (RAOC) Methodology and (b) to be consistent with Specification 4.2.2.3 for Base Load operation. This revision also includes increasing the power level from 15% to 50% in the APPLICABILITY section of the LCO.

Justification: This proposed change is performed in accordance with the NRC approved methodology of WCAP-10216-P-A, "Relaxation of Constant Axial Offset Control F_0 Surveillance Technical Specification". In contrast with the present AFD methodology of Constant Axial Offset Control (CAOC) as specified in the Technical Specifications, RAOC does not include penalty points accumulation (i.e. one penalty point for every minute that AFD is outside the target band above 50% power and one half penalty point for every minute AFD is outside the target band below 50% but above 15% power). By eliminating the penalty point accumulation time, ACTION b. of T.S. 3.2.1. and footnote # is deleted.

In Insert 2, LCO 3.2.1 b., ACTION b. of T.S. 3.2.1 and footnote ** are added to be consistent with the SURVEILLANCE REQUIREMENTS of Specification 4.2.2.3, Base Load.

Footnote *** in Insert 2, is relocated from SURVEILLANCE REQUIREMENT 4.2.1.2 (first sentence), since without the conditions for a penalty deviation this requirement is no longer considered a SURVEILLANCE REQUIREMENT.

7. Technical Specification 4.2.1.1: revise the SURVEILLANCE REQUIREMENT 4.2.1.1 to conform to the Relaxed Axial Offset Control Methodology. This revision involves increasing the power level from 15% to 50%.

Justification: The proposed change is performed in accordance with the NRC-approved methodology of WCAP-10216-P-A, "Relaxation of Constant Axial Offset Control F₀ Surveillance Technical Specification". The increase in power level from 15% to 50% corresponds to the end point specified in the (revised RAOC) Axial Flux Difference Limits curve, which is proposed to be included in the COLR.

8. Technical Specification 4.2.1.2: delete SURVEILLANCE REQUIREMENT 4.2.1.2 to conform to the Relaxed Axial Offset Control Methodology.

Justification: In contrast with the present AFD methodology of Constant Axial Offset Control (CAOC) as specified in the Technical Specifications, RAOC does not include penalty points accumulation (i.e. one penalty point for every minute that AFD is outside the target band above 50% power and one half penalty point for every minute AFD is outside the target band below 50% but above 15% power). By eliminating the penalty points accumulation time, the SURVEILLANCE REQUIREMENT 4.2.1.2 is deleted. The first sentence of T.S. 4.2.1.2 is relocated to the footnote ***.

9. Technical Specification 4.2.1.3 and 4.2.1.4: change the Technical Specification numbering sequence to be consistent with the removal of T.S. 4.2.1.2, and in T.S. 4.2.1.4 change the reference to T.S. 4.2.1.3 to 4.2.1.2, since the specification number referenced would be resequenced.

Justification: The proposed change is editorial in nature and is revised to be consistent with the Technical Specifications.

10. Technical Specification Figure 3.2-1: Delete figure 3.2.1 from Technical Specifications and insert the equivalent RAOC figure in the CORE OPERATING LIMITS REPORT (COLR).

Justification: This proposed change is consistent with the recommendations of Generic Letter 88-16, since the Axial Flux Difference Limits as a function of Rated Thermal Power are cycle-specific parameter limits developed using NRC-approved methods. This curve will be included in the unit-specific COLR.

11. Technical Specification POWER DISTRIBUTION LIMITS BASES: revise the BASES to (a) conform to the RAOC Methodology and (b) be consistent with Specification 4.2.2.3 for Base Load operation. The revised wording is included in Insert 4.

Justification: The wording in the BASES is revised to reflect the proposed changes to the Technical Specifications as addressed in this submittal. Specifically the change from CAOC to RAOC AFD methodology and the conditions for Base Load operation as specified in T.S. 4.2.2.3.

12. Technical Specification Figure B 3/4 2-1: Delete the figure for "Typical Indicated Axial Flux Difference versus Thermal Power" from Technical Specifications and insert the equivalent RAOC figure in the CORE OPERATING LIMITS REPORT (COLR).

Justification: This proposed change is consistent with the recommendations of Generic Letter 88-16, since the Axial Flux Difference Limits as a function of Rated Thermal Power are cycle-specific parameter limits developed using NRC approved methods. This curve will be included in the unit-specific COLR.

13. Technical Specification 6.9.1.7: add a Technical Specification Administrative Controls requirement for the "CORE OPERATING LIMITS REPORT"

Justification: The proposed change adds the Technical Specification requirement of the "CORE OPERATING LIMITS REPORT" to be consistent with the recommendations of Generic Letter 88-16. Consistent with GL 88-16, the NRC-approved methodology is specified. The actual COLR report will be required to be submitted to the NRC within 30 days after plant startup or parameter limit revision to allow continued trending of cycle-specific parameters.

Safety Analysis Review

The current method of controlling reactor physics parameters to assure conformance with 10 CFR 50.36 is to specify the values determined to be within the acceptance criteria using an NRC-approved calculational methodology. As previously discussed, the methodology for calculating the RAOC AFD limits has been reviewed and approved by the NRC (reference 2).

1. Loss of Coolant Accident (LOCA) and LOCA-Related Evaluations

The change from CAOC to RAOC methodology has been evaluated by Westinghouse for Turkey Point Unit 3 Cycle 13 and Unit 4 Cycle 14 operation for impact upon the LOCA analyses. The LOCA and LOCA-related accident analyses remain valid for the RAOC implementation and their effect on the safety analysis limits. RAOC does not affect the normal plant operating parameters, the safeguards system actuation, the accident mitigation capabilities important to LOCA, the assumptions used in the LOCA-related accidents, or create conditions more limiting than those assumed in these analyses.

2. Non-LOCA Related Evaluations

The effect on the non-LOCA events of a change from CAOC to RAOC is to increase the number of power shapes that must be considered when developing the Overtemperature ΔT and Overpower ΔT reactor trip setpoints. The overtemperature ΔT reactor trip function is designed to ensure plant operation within the DNBR design basis and hot-leg boiling limits. A compensating term which is a function of AFD, $f(\Delta I)$, is also factored into the overtemperature ΔT reactor trip setting to offset the effect of adverse core power distribution. The overpower ΔT reactor trip setpoint is designed to ensure plant operation within the fuel centerline temperature design basis. The RAOC strategy does not require any modifications to these reactor trip setpoints.

A Westinghouse evaluation of the non-LOCA events determined that the change from CAOC to RAOC control strategy does not result in a change to any of the safety analysis initial assumptions including core physics and core limits data. The evaluation concluded that the implementation of the RAOC strategy does not adversely affect the results of the non-LOCA analyses and that the conclusions made in the UFSAR (reference 3) remain valid.

3. Containment Integrity Evaluations

The implementation of RAOC does not adversely affect the short and long term LOCA mass and energy releases and/or the main steamline break mass and energy release containment analyses. RAOC does not affect the normal plant operating parameters, system actuation, accident mitigating capabilities or assumptions important to the containment analyses, or create conditions more limiting than those assumed in these analyses. Therefore, the conclusions presented in the UFSAR remain valid with respect to the containment integrity.

4. Radiological Evaluation

The transition to the RAOC methodology would not affect the radiological consequences or the post-LOCA hydrogen production. Since the inputs to the radiation dose analysis do not change, the doses remain within previously acceptable limits as defined by 10 CFR 100. Therefore, the consequences to the public resulting from any accident previously evaluated in the UFSAR have not increased.

5. Mechanical Components and System Evaluation

The implementation of RAOC does not directly or indirectly involve mechanical component hardware considerations. Direct effects as well as indirect effects on equipment important to safety have been considered. Indirect effects include activities which involve non-safety related equipment which may affect equipment important to safety. Component hardware considerations may include overall component integrity, subcomponent integrity and the adequacy of component supports during all plant conditions. A Westinghouse evaluation determined that the implementation of RAOC does not alter the design, material, construction standards, function or method of performance of equipment important to safety. Also, RAOC implementation does not affect the integrity of a plant auxiliary fluid system or the ability of the system to perform its intended safety function.

The removal of cycle dependent variables from the Technical Specifications has no impact upon plant operation or safety. No safety-related equipment, safety function, or plant operations will be altered as a result of implementing the COLR. Since the applicable UFSAR limits will be maintained and the Technical Specifications will continue to require operation within the core operating limits calculated using NRC approved methodologies, the implementation of the COLR is administrative in nature as described in Generic Letter 88-16. Appropriate actions to be taken if AFD limits are violated will remain in the Technical Specifications.

Any changes to the COLR will be made in accordance with the provisions in 10 CFR 50.59. From cycle to cycle, the COLR will be revised such that the appropriate AFD limits for the applicable cycle will apply. The COLR for Turkey Point Unit 3 Cycle 13 and Unit 4 Cycle 14 is presented in Attachments 4 and 5, respectively. The RAOC AFD limits for Unit 3 Cycle 13 were generated assuming a cycle exposure greater than 6,000 Megawatt-days/Metric-Ton Uranium (MWD/MTU).

L-93-092
Attachment 1
Page 9 of 9

References

1. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," Westinghouse Electric Corporation, dated September 1974.
2. WCAP-10216-P-A, "Relaxation of Constant Axial Offset Control F_0 Surveillance Technical Specification," Westinghouse Electric Corporation, dated June 1983.
3. Florida Power & Light Company Turkey Point Plant Units 3 & 4, Updated Final Safety Analysis Report.

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendments

The proposed revision to the Technical Specifications changes the Axial Flux Difference (AFD) control methodology from Constant Axial Offset Control (CAOC) to Relaxed Axial Offset Control (RAOC) and relocates the AFD cycle-specific core operating limits from the Technical Specifications to the Core Operating Limits Report (COLR). RAOC is the methodology developed for Westinghouse plants which allows AFD operation over a fixed wide range in AFD between 100% and 50% power with no limits below 50%. In contrast with the CAOC methodology, RAOC does not include penalty points accumulation (i.e. one penalty point for every minute that AFD is outside the target band above 50% power and one half penalty point for every minute AFD is outside the target band below 50% but above 15% power).

The proposed changes to the Technical Specifications consist of the following:

1. The AFD requirements are modified to conform with those of RAOC.
2. The AFD Technical Specification is modified to note that cycle-specific limits are contained in the Core Operating Limits Report (COLR).
3. The AFD for Base Load operation is included to be consistent with Specification 4.2.2.3.
4. The BASES Section of the Technical Specifications for AFD surveillance is changed to reflect the new RAOC methodology.
5. Consistent with Generic Letter 88-16, a COLR subsection is added to the Administrative Controls Section of the Technical Specifications which specifies the timetable of the COLR submittal. The actual COLR report will be required to be submitted to the NRC within 30 days after plant startup or parameter limit revision to allow continued trending of cycle-specific parameters.
6. Minor editorial changes to the INDEX and Section 1.0, DEFINITIONS to be consistent with the format of the Technical Specifications.

Introduction

The Nuclear Regulatory 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. Each standard is discussed below for the proposed license amendments.

Discussion

- (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 removal of cycle-specific Axial Flux Difference (AFD) limits from the Turkey Point Units 3 and 4 Technical Specifications is administrative in nature and has no impact on the probability or consequences of any Design Bases Event (DBE) occurrences which was previously evaluated. The determination of the AFD (RAOC) limits will be performed using methodology approved by the NRC and poses no significant increase in the probability or consequences of any accident previously evaluated.

No new performance requirements are being imposed on any system or component in order to support implementation of RAOC. The AFD limits associated with RAOC assure that the limiting safety analysis inputs (F_0 , limiting axial power shape) are not exceeded. Since the results of the LOCA and Non-LOCA analyses remain applicable, the inputs to the radiation dose analysis do not change. Therefore, the consequences to the public resulting from an accident previously evaluated in the UFSAR is not increased.

The AFD (RAOC) limits will be generated every cycle to ensure proper compliance with the UFSAR. The generation of the AFD (RAOC) limits will be performed in accordance with 10 CFR 50.59, which ensures that the reload will not involve an increase in the probability of occurrences or consequences of an accident previously evaluated.

The editorial changes proposed are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the facility, nor do they affect Technical Specifications that

preserve safety analysis assumptions. Therefore, these 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 removal of the AFD from the Technical Specifications is administrative in nature and has no impact, nor does it contribute in any way to the possibility of a new or different kind of accident from any accident previously evaluated.

The use of RAOC rather than CAOC for power distribution control has been approved by the NRC. No new accident scenarios, failure mechanisms or limiting single failure events are introduced as a result of the implementation of RAOC. The institution of RAOC will have no adverse effect and does not challenge the performance of any other safety related system.

The determination of the AFD (RAOC) limits will be performed using NRC-approved methodology and are submitted to the NRC as a revision to the COLR to allow the Staff to trend the AFD limits. The Technical Specifications will continue to require operation within the required core operating limits and appropriate actions will be taken if the AFD limits are exceeded. Therefore, the proposed amendment does not in any way create the possibility of a new or different kind of accident from any accident previously evaluated.

The editorial changes proposed are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the facility, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, these proposed changes 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 the margin of safety.

The margin of safety is not affected by the removal of the AFD limits from the Technical Specifications. The RAOC methodology for power distribution controls has been approved by the NRC and does not constitute a significant reduction in the margin of safety.

The supporting Technical Specification values are defined by the accident analyses which are performed to conservatively bound the operating conditions defined by the Technical Specifications. Performance of analyses and evaluations for the transition to RAOC have confirmed that the operating envelope defined by the Technical Specifications continues to be bounded by the analytical basis, which in no case exceeds the acceptance limits. Therefore, the margin of safety provided in the analyses in accordance with the acceptance limits is maintained and not reduced.

The development of the limits for future reloads will continue to conform to those methods described in NRC approved documentation. In addition, each future reload will involve a 10 CFR 50.59 review to assure that operation of the units within the cycle specific limits will not involve a reduction in a margin of safety. Therefore, the proposed amendment does not significantly reduce the margin of safety.

The proposed editorial changes are administrative in nature and do not relate to or modify the safety margins defined in, and or maintained by, the Technical Specifications.

Summary

Based on the above discussion, FPL has determined that the proposed amendments do 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 the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.

