

# ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9308300163      DOC. DATE: 93/08/17      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  
AUTH. NAME      AUTHOR AFFILIATION  
PLUNKETT, T.F.      Florida Power & Light Co.      *See Reports*  
RECIP. NAME      RECIPIENT AFFILIATION  
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising  
License Conditions 3.G & 3.F respectively, to conform to std  
fire protection license proposed as stated in GL 86-10.

DISTRIBUTION CODE: A006D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 10 + 39  
TITLE: OR/Licensing Submittal: Fire Protection

## NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-2 LA	1 0	PD2-2 PD	1 1
	RAGHAVAN, L	2 2		
INTERNAL:	NRR/DSSA/SPLB	1 1	NUDOCS-ABSTRACT	1 1
	OC/LEDCEB	1 0	OGC/HDS3	1 0
	<u>REG-FILE</u> 01	1 1		
EXTERNAL:	NRC PDR	1 1	NSIC	1 1

## NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 11 ENCL 8





**FPL**

**AUG 17 1993**

L-93-192  
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  
Fire Protection Technical Specifications

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 revise License Conditions 3.G and 3.F respectively, to conform to the standard fire protection License Condition as stated in Generic Letter 86-10. In addition, the proposed amendments modify the Turkey Point Units 3 and 4 Technical Specifications (T.S.) to delete T.S. 3.3.3.4, 4.3.3.4.1, 4.3.3.4.2, Table 3.3-6, 3/4.7.8, Tables 3.7-4 and 3.7-5, 3/4.7.9, 6.2.2.f and the corresponding BASES, and to revise T. S. 6.5.1.6 in accordance with the recommendations contained in Generic Letter 88-12. The TABLE OF CONTENTS and appropriate page numbers would be revised to reflect the above changes.

FPL has determined that the proposed license amendments do not involve a significant hazards consideration 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 changes 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 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

TFP/TCG/RJT

Attachments

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point  
W. A. Passetti, Florida Dept. of Health and Rehabilitative Svc.

9308300163 930817  
PDR ADDCK 05000250  
P PDR

an FPL Group company

*Handwritten initials: A006*



STATE OF FLORIDA       )  
                              ) ss.  
COUNTY OF DADE       )

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

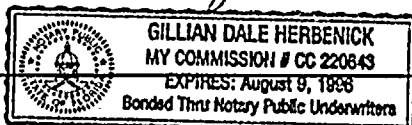
That he is Vice President, Turkey Point Nuclear Plant, of Florida Power and Light Company, the Licensee herein;

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  
T. F. Plunkett

Subscribed and sworn to before me this

16<sup>th</sup> day of August, 1993.



Gillian Dale Herbenick  
Gillian Dale Herbenick

Name of Notary Public (Type or Print)

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

My Commission expires 8/9/96  
Commission No. CC 220643

T. F. Plunkett is personally known to me.

ATTACHMENT 1

SAFETY ANALYSIS

9308300163

### SAFETY ANALYSES

#### **Description of Proposed License Amendments**

Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," issued April 24, 1986, requested that licensees incorporate the NRC approved Fire Protection Program in their Final Safety Analysis Reports (FSAR). The FSAR update would include the incorporation of the Fire Protection Program, including the fire hazards analysis and major commitments that form the basis for the Fire Protection Program. GL 86-10 also encouraged licensees to apply for an amendment to their operating licenses (1) to replace the current license conditions regarding fire protection with a new standard condition, and (2) to remove unnecessary fire protection Technical Specifications (T.S.). GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," issued August 2, 1988, provided additional guidance for the preparation of a license amendment request to implement GL 86-10.

The Turkey Point Plant Fire Protection Program Report was added to the FSAR by Revision 5 in July 1987.

The proposed amendments would revise License Condition 3.G of Facility Operating License DPR-31 and License Condition 3.F of Facility Operating License DPR-41 for Turkey Point Units 3 and 4, respectively, to conform to the standard fire protection license condition in GL 86-10.

The proposed amendments would also relocate the LIMITING CONDITION FOR OPERATION (LCO) and SURVEILLANCE REQUIREMENTS associated with fire detection systems, fire suppression systems, fire rated assemblies, and the administrative controls that address fire brigade staffing from the Turkey Point Units 3 and 4 Technical Specifications (T.S.) in accordance with GL 88-12. Specifically, T.S. 3.3.3.4, 4.3.3.4.1, 4.3.3.4.2, Table 3.3-6, 3/4.7.8, Tables 3.7-4 and 3.7-5, 3/4.7.9, 6.2.2.f and the corresponding BASES section would be deleted. All operational conditions, remedial actions and test requirements presently in the Technical Specifications for these systems, as well as the fire brigade requirements, would be controlled through the Fire Protection Program and associated procedures. Appendix 9.6A (Fire Protection Program Report) of the FSAR, would discuss how these relocated requirements will be controlled. T.S. 6.5.1.6 would be revised to give the Plant Nuclear Safety Committee (PNSC) the responsibility for the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board (CNRB). Oversight of the Fire Protection Program by the CNRB is currently required by T.S. 6.5.2.8 e and 6.5.2.8 f. The TABLE OF CONTENTS and appropriate page numbers would be revised to reflect the above changes.





### Proposed Technical Specification Changes

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

1. License Conditions 3.G of Facility Operating License DPR-31 and 3.F of Facility Operating License DPR-41: revise in accordance with the guidance provided in Section F of Generic Letter 86-10.

Justification: The proposed license changes are administrative in nature in that they revise the current fire protection License Conditions to conform with the standard fire protection License Condition in Section F of GL 86-10. The standard fire protection license condition requiring compliance with the Fire Protection Program as described in the FSAR would ensure uniform enforcement of fire protection requirements by the NRC. Since the Fire Protection Program described in the FSAR is not being changed, the safe operation of the plant is not affected.

2. TABLE OF CONTENTS: Revise the TABLE OF CONTENTS to reflect the deletion of Technical Specifications 3.3.3.4, 4.3.3.4.1, 4.3.3.4.2, Table 3.3-6, 3/4.7.8, Tables 3.7-4 and 3.7-5, 3/4.7.9, and BASES Section 3/4.7.8 and 3/4.7.9.

Justification: The TABLE OF CONTENTS for the Turkey Point Unit 3 and 4 Technical Specifications are revised to reflect the above proposed changes.

3. Technical Specifications 3/4.3.4, Fire Detection Instrumentation: Delete T.S. 3.3.3.4, 4.3.3.4.1, 4.3.3.4.2, and Table 3.3-6.

Justification: The requirements of these specifications are being moved in their entirety to plant procedures. This change is administrative in nature in that no requirements are being altered. Provisions for review of future changes to these requirements are covered by the change to Technical Specification 6.5.1.6.

4. Technical Specification Pages 3/4 3-50 through 3/4 3-61: Renumber the pages to support the deletion of T.S. 3/4.3.4

Justification: This change is administrative in nature in that no requirements are being altered.

5. Technical Specification 3/4.7.8, Fire Suppression Systems: Delete T.S. 3/4.7.8 (including T.S. 3/4.7.8.1, 3/4.7.8.2, 3/4.7.8.3, Table 3.7-4, T.S. 3/4.7.8.4, and Table 3.7-5).

Justification: The requirements of these specifications are being moved in their entirety to plant procedures. This change is administrative in nature in that no requirements are being altered. Provisions for review of future changes to these requirements are covered by the change to Technical Specification 6.5.1.6.

6. Technical Specification 3/4.7.9, Fire Rated Assemblies: Delete T.S. 3/4.7.9.

Justification: The requirements of this specification are being moved in their entirety to plant procedures. This change is administrative in nature in that no requirements are being altered. Provisions for review of future changes to these requirements are covered by the change to Technical Specification 6.5.1.6.

7. Technical Specification 6.2.2 f, Plant Staff: Delete T.S. 6.2.2 f, and delete the wording "and Fire Brigade" from the associated footnote.

Justification: The requirements of this specification are being moved in their entirety to plant procedures. This change is administrative in nature in that no requirements are being altered. Provisions for review of future changes to these requirements are covered by the change to Technical Specification 6.5.1.6.

8. Technical Specification 6.5.1.6, Plant Nuclear Safety Committee (PNSC) Responsibilities: Add the following new T.S. requirement 6.5.1.6 l to read:

1. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Company Nuclear Review Board.

Justification: This change reinforces the importance of the Fire Protection Program on plant safety and assures a multi-discipline review by the PNSC of proposed changes to those requirements that are being removed from the Technical Specifications. This requirement ensures administrative controls on the Fire Protection Program similar to those on other programs that are implemented by license condition, e.g., the Emergency Plan.

9. Technical Specification BASES 3/4.3.3.4, 3/4.7.8 and 3/4.7.9: Delete these BASES sections.

Justification: The BASES for Section 3.0 and 4.0 of the Turkey Point Unit 3 and 4 Technical Specifications are revised to reflect the above proposed changes.



ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS DETERMINATION



DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

**Description of Proposed License Amendments**

Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," issued April 24, 1986, requested that licensees incorporate the NRC approved Fire Protection Program in their Final Safety Analysis Reports (FSAR). The FSAR update would include the incorporation of the Fire Protection Program, including the fire hazards analysis and major commitments that form the basis for the Fire Protection Program. GL 86-10 also encouraged licensees to apply for an amendment to their operating licenses (1) to replace the current license conditions regarding fire protection with a new standard condition, and (2) to remove unnecessary fire protection Technical Specifications (T.S.). GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," issued August 2, 1988, provided additional guidance for the preparation of a license amendment request to implement GL 86-10.

The Turkey Point Plant Fire Protection Program Report was added to the FSAR by Revision 5 in July 1987.

The proposed amendments would revise License Condition 3.G of Facility Operating License DPR-31 and License Condition 3.F of Facility Operating License DPR-41 for Turkey Point Units 3 and 4, respectively, to conform to the standard fire protection license condition in GL 86-10.

The proposed amendments would also relocate the LIMITING CONDITIONS FOR OPERATION (LCO) and SURVEILLANCE REQUIREMENTS associated with fire detection systems, fire suppression systems, fire rated assemblies, and the administrative controls that address fire brigade staffing from the Turkey Point Units 3 and 4 Technical Specifications (T.S.) in accordance with GL 88-12. Specifically, T.S. 3.3.3.4, 4.3.3.4.1, 4.3.3.4.2, Table 3.3-6, 3/4.7.8, Tables 3.7-4 and 3.7-5, 3/4.7.9, 6.2.2.f and the corresponding BASES sections would be deleted. All operational conditions, remedial actions and test requirements presently in the Technical Specifications for these systems, as well as the fire brigade requirements, would be controlled through the Fire Protection Program and associated procedures. Appendix 9.6A (Fire Protection Program Report) of the FSAR, would discuss how these relocated requirements will be controlled. T.S. 6.5.1.6 would be revised to give the Plant Nuclear Safety Committee (PNSC) the responsibility for the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Company Nuclear Review Board (CNRB). Oversight of the Fire Protection Program by the CNRB is currently required by T.S. 6.5.2.8 e and 6.5.2.8 f. The TABLE OF CONTENTS and appropriate page numbers would be revised to reflect the above changes.



## Introduction

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 59.92(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 amendments.

## Discussion

- (1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes being proposed are administrative in nature in that they revise the current fire protection license condition to conform to the standard fire protection license condition in GL 86-10, relocate Technical Specification requirements associated with fire detection systems, fire suppression systems, fire rated assemblies, and the administrative controls that address fire brigade staffing from the Technical Specifications to the Fire Protection Program and associated procedures without altering them, and gives additional responsibility for Fire Protection Program review to the Plant Nuclear Safety Committee. These changes are in accordance with the recommendations contained in Generic Letters 86-10 and 88-12. No change is being made to existing requirements or commitments. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do they affect any assumptions or conditions in any of the accident analyses. Since the accident analyses remain bounding, their radiological consequences are not adversely affected.

Therefore, the probability or consequences of an accident previously evaluated are not affected.

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

The changes being proposed are administrative in nature in that they revise the current fire protection license condition to conform to the standard fire protection license condition in GL 86-10, relocate Technical Specification requirements associated with fire detection systems, fire suppression systems, fire rated assemblies, and the administrative controls that address fire brigade staffing from the Technical Specifications to the Fire





Protection Program and associated procedures without altering them, and gives additional responsibility for Fire Protection Program review to the Plant Nuclear Safety Committee. These changes are in accordance with the recommendations contained in Generic Letters 86-10 and 88-12. No change is being made to existing requirements or commitments. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident.

Therefore, the possibility of a new or different kind of accident from any accident previously evaluated would not be created.

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

The changes being proposed are administrative in nature in that they revise the current fire protection license condition to conform to the standard fire protection license condition in GL 86-10, relocate Technical Specification requirements associated with fire detection systems, fire suppression systems, fire rated assemblies, and the administrative controls that address fire brigade staffing from the Technical Specification to the Fire Protection Program and associated procedures without altering them, and give additional responsibility for Fire Protection Program review to the Plant Nuclear Safety Committee. These changes are in accordance with the recommendations contained in Generic Letters 86-10 and 88-12. No change is being made to existing requirements or commitments.

Therefore, a significant reduction in a margin of safety would not be involved.

#### Summary

Based on the above discussion, 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 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.

