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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
AUTH.NAME AUTHOR AFFILIATION
PLUNKETT,T.F. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to licenses DPR-31 & DPR-41 revising surveillance requirement 4.6.1.2a & associated bases to conform w/NUREG 1431,Standard TS,Westinghouse Plants,Rev 0.

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FPL

OCT 0 4 1993

L-93-241
10 CFR 50.90
10 CFR 50 Appendix J

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Containment Leakage, Surveillance Requirements

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 the Surveillance Requirement 4.6.1.2a and the associated Bases to conform with NUREG 1431, Standard Technical Specifications, Westinghouse Plants, Revision 0, dated September 1992. This proposed license amendment involves an administrative change to the surveillance frequency for the performance of Type A Tests which determine the Overall Containment Leakage Rate.

FPL has determined that the proposed license amendment does 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 consideration 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 Nuclear Review Board.

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FPL requests that this proposed license amendment be reviewed and issued by the end of June, 1994, so that this request will be in effect for the next Turkey Point Unit 4 outage which is scheduled to be performed in the Fall of 1994. FPL intends to request an exemption from certain requirements of 10 CFR 50 Appendix J for the Type A Test interval that would allow FPL to perform the Type A Test every third refueling outage. A Type A test is currently scheduled for the Fall 1994 refueling outage.

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

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

TFP\RG\OIH

Attachments

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

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, 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 4 day of OCTOBER, 1993.

Cheryl A. Kelly
Name of Notary Public (Type or Print)
NOTARY PUBLIC, in and for the County of Dade, State of Florida

My Commission expires
Commission No.

CHERYL A. KELLY
MY COMMISSION # CC 223781
EXPIRES: September 27, 1996
Bonded Thru Notary Public Underwriters

T. F. Plunkett is personally known to me.

ATTACHMENT 1

SAFETY ANALYSIS

SAFETY ANALYSIS

Description of Proposed License Amendment

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to revise Surveillance Requirement 4.6.1.2a, to conform with NUREG 1431, Standard Technical Specifications, Westinghouse Plants, Revision 0, dated September, 1992. NUREG 1431, as approved by the NRC, provides the basis for this submittal. This Technical Specification change request involves an administrative change to the surveillance requirement for the performance of Type A Tests which determine the Overall Integrated Containment Leakage Rate.

The current surveillance frequency found in Turkey Point Technical Specifications is based on the schedule set forth in 10 CFR 50 Appendix J. Specifically, Turkey Point Technical Specification 4.6.1.2a requires that "Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 ± 10 month intervals during shutdown at a pressure not less than Pa, 49.9 psig, during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection." This test frequency does not provide for longer fuel cycle lengths and longer refueling outages in which major plant modifications are implemented.

The wording of the surveillance frequency found in the Standard Technical Specifications for Westinghouse Plants (NUREG 1431) provides flexibility in the test frequency. The Standard Technical Specifications allow for changes in test frequencies by means of an NRC approved exemption request to 10 CFR 50 Appendix J. This Technical Specification amendment will prevent unnecessary Technical Specification change requests from being processed when the fuel cycle does not match the 40 ± 10 month frequency as presently required in the Turkey Point Technical Specifications.

Proposed Technical Specification Change

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

1. Surveillance Requirement 4.6.1.2a : Revise the surveillance requirement to read,

   "Type A test shall be performed in accordance with 10 CFR 50 Appendix J, as modified by approved exemptions."

   Justification: The proposed change is administrative in nature in that the proposed change will adopt the guidance

provided in NUREG 1431, Standard Technical Specifications, Westinghouse Plants, dated September 1992, for the performance of Type A tests in accordance with 10 CFR 50 Appendix J, as modified by approved exemptions. Any exemptions to the requirements of 10 CFR 50 Appendix J require prior NRC approval. This guidance and wording was approved and issued by the NRC Office of Nuclear Reactor Regulation. NUREG 1431 was developed based on the criteria in the interim Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated February 6, 1987. The proposed Technical Specification change does 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 analysis.

2. Bases Section 3/4.6 : Revise the Bases section to include approved exemptions to Appendix J by adding the words "as modified by approved exemptions."

   Justification: The Bases section provides information on how the surveillance interval was developed. The addition of "as modified by approved exemptions" to 10 CFR 50 Appendix J is administrative in nature and provides consistency with the Surveillance Requirement 4.6.1.2a.

ATTACHMENT 2

Determination of No significant Hazards Considerations

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendment

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to revise Surveillance Requirement 4.6.1.2a, to conform with NUREG 1431, Standard Technical Specifications, Westinghouse Plants, Revision 0, dated September, 1992. NUREG 1431, as approved by the NRC, provides the basis for this submittal. This Technical Specification change request involves an administrative change to the surveillance requirement for the performance of Type A Tests which determine the Overall Integrated Containment Leakage Rate.

The current surveillance frequency found in Turkey Point Technical Specifications is based on the schedule set forth in 10 CFR 50 Appendix J. Specifically, Turkey Point Technical Specification 4.6.1.2a requires that "Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40 ± 10 month intervals during shutdown at a pressure not less than Pa, 49.9 psig, during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection." This test frequency does not provide for longer fuel cycle lengths and longer refueling outages in which major plant modifications are implemented.

The wording of the surveillance frequency found in the Standard Technical Specifications for Westinghouse Plants (NUREG 1431) provides flexibility in the test frequency. The Standard Technical Specifications allow for changes in test frequencies by means of an NRC approved exemption request to 10 CFR 50 Appendix J. This Technical Specification amendment will prevent unnecessary Technical Specification change requests from being processed when the fuel cycle does not match the 40 ± 10 month frequency as presently required in the Turkey Point Technical Specifications.

Introduction

The Nuclear Regulatory Commission has approved standards for determining whether a significant hazards consideration exists (10 CFR 50.92 (c)). A proposed amendment to an operating license for a 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 a possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a reduction in a margin of safety.

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 proposed license change is administrative in nature in that the proposed change will adopt the guidance and wording provided in NUREG 1431, Standard Technical Specifications, Westinghouse Plants, dated September, 1992, for the performance of Type A tests in accordance with 10 CFR 50 Appendix J. This guidance was approved and issued by the NRC Office of Nuclear Reactor Regulation. NUREG 1431 was developed based on the criteria in the interim Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated February 6, 1987. Specifically, the proposed change removes the schedular requirements of 40 ± 10 months for the performance interval for Type A test from the surveillance requirement and would require the test interval to be in accordance with 10 CFR 50 Appendix J and any approved exemptions. The proposed Technical Specification change does 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 analysis. 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 proposed license change is administrative in nature in that the proposed change will adopt the guidance and wording provided in NUREG 1431, Standard Technical Specifications, Westinghouse Plants, dated September, 1992, for the performance of Type A tests in accordance with 10 CFR 50 Appendix J. This guidance and wording was approved and issued by the NRC Office of Nuclear Reactor Regulation. NUREG 1431 was developed based on the criteria in the interim Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated February 6, 1987. Specifically, the proposed change removes the schedular requirements of 40 ± 10 months for the performance interval for Type A test from the surveillance requirement and would require the test interval to be in accordance with 10 CFR 50 Appendix J and any approved exemptions. The proposed Technical Specification change

does 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. Therefore, the possibility of a new or different kind of an 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 proposed license change is administrative in nature in that the proposed change will adopt the guidance and wording provided in NUREG 1431, Standard Technical Specifications, Westinghouse Plants, dated September, 1992, for the performance of Type A tests in accordance with 10 CFR 50 Appendix J. This guidance and wording was approved and issued by the NRC Office of Nuclear Reactor Regulation. NUREG 1431 was developed based on the criteria in the interim Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated February 6, 1987. Specifically, the proposed change removes the schedular requirements of 40 $\pm$ 10 months for the performance interval for Type A test from the surveillance requirement and would require the test interval to be in accordance with 10 CFR 50 Appendix J and any approved exemptions. 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; or (2) create a possibility of a new or different kind of accident from any previously evaluated; or (3) involve a reduction in a margin of safety; and therefore, the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92.