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AUTH. NAME AUTHOR AFFILIATION
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, revising
 TS 3/4.4.9.1 to remove schedule for withdrawal of RV matl
 surveillance specimens, GL 91-01.

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FPL

OCT 20 1994

L-94-243
10 CFR §50.90
10 CFR §50.92
10 CFR 50 Appendix H

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
Removal of the Schedule for the Withdrawal of Reactor
Vessel Material Specimens from Technical Specifications
(Generic Letter 91-01)

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 Turkey Point Units 3 and 4 Technical Specification (TS) 3/4.4.9.1.

These amendments will remove from the Turkey Point Units 3 and 4 TS the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to 10 CFR Part 50. These proposed license amendments are consistent with the guidance provided to licensees by NRC Generic Letter 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications."

Additionally, these amendments propose to correct a typographical error in the TS BASES and to revise the reference in the TS BASES to the American Society for Testing and Materials (ASTM) standard by which the fracture toughness properties of the ferritic materials in the reactor vessels are determined.

FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR §50.92. A Safety Analysis in support of the proposed license amendments addressing the proposed changes is included in Attachment 1. In accordance with 10 CFR §50.92, Attachment 2 is FPL's Determination of No Significant Hazards Consideration for the proposed license amendments. Attachment 3 provides the proposed revised Technical Specifications changes.

These proposed license amendments have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

A copy of these proposed license amendments is being forwarded to the state designee for the State of Florida in accordance with 10 CFR §50.91(b)(1).

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Should you have any questions about this submittal, please contact us.

Very truly yours,



T. F. Plunkett
Vice President
Turkey Point Plant

TFP/EJW/RJT

Attachments

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC
T. P. Johnson, Sr. 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 Plant, of Florida Power and Light Company, the Licensee herein;

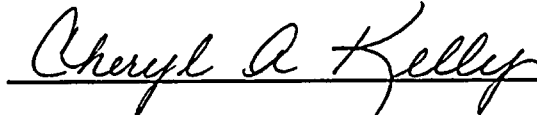
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.



T. F. Plunkett

Subscribed and sworn to before me this

20 day of OCT, 1994.



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

NRC Generic Letter (GL) 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications", encouraged licensees to adopt the line-item Technical Specification (TS) improvement by proposing changes to their TS that are consistent with the guidance of that generic letter. The following Safety Analysis addresses the implementation of the line-item improvement to the Turkey Point Units 3 and 4 TS.

In addition to the implementation of the line-item improvements of GL 91-01, FPL proposes to correct typographical errors in the TS BASES and to revise the reference in the TS BASES to the American Society for Testing and Materials (ASTM) standard by which the fracture toughness properties of the ferritic materials in the Turkey Point Units 3 and 4 reactor vessels are determined.

Background

The LIMITING CONDITIONS FOR OPERATION (LCO) of TS 3/4.4.9.1, "Pressure/ Temperature Limits," for the Reactor Coolant System (RCS) include operating limits on pressure and temperature that are defined in figures that provide an acceptable region for operation during heatup, cooldown, criticality, and inservice leak and hydrostatic testing. An associated SURVEILLANCE REQUIREMENT (SR) addresses the frequency of verifying that unit operation is within the specified limits during these operating conditions. In addition, TS SR 4.4.9.1.2 includes the requirement that reactor vessel material surveillance specimens be removed and examined to determine changes in material properties, as required by Title 10, Code of Federal Regulations Part 50, Appendix H (10 CFR Part 50, Appendix H), and in accordance with the schedule in TS Table 4.4-5.

The NRC staff has approved a request to remove the specimen withdrawal schedule from the TS for the Joseph M. Farley Nuclear Plant. The TS change was requested because Section II.B.3 of Appendix H to 10 CFR Part 50 requires the submittal to, and approval by, the NRC of a proposed withdrawal schedule for material specimens before implementation. Hence, the placement of this schedule in the TS, it was concluded, duplicates the controls on changes to this schedule that have been established in 10 CFR 50 Appendix H. The NRC staff concluded that, because this duplication is unnecessary, the removal of this TS schedule as a line-item Technical Specification improvement is consistent with the Commission Policy Statement on Technical Specifications Improvements.

Discussion

The Turkey Point Units 3 and 4 TS include LCOs that establish pressure and temperature limits for the RCS. Turkey Point Units 3 and 4 TS

3/4.4.9.1, "Pressure/Temperature Limits," contains a LIMITING CONDITION FOR OPERATION for the RCS that limits the rate of change in temperature and pressure to values consistent with the fracture toughness requirements of Appendix G of the 1983 Edition of Section III of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code and the additional requirements of Appendix G to 10 CFR Part 50. The limits are defined by Turkey Point Units 3 and 4 TS Figures 3.4-2, 3.4-3, and 3.4-4 and provide an acceptable range of operating temperatures and pressures for heatup, cooldown, criticality, and inservice leak and hydrostatic testing. The current limits in these TS figures are valid up to 20 Effective Full-Power Years (EFPY) of operation. Changes in the values of these limits are necessary because the fracture toughness properties of ferritic materials in the reactor vessel change as a function of the reactor operating time (neutron fluence).

A program for reactor vessel material surveillance ensures the availability of data to update the inservice operating pressure and temperature limits. This program assists in fulfilling the requirements of Appendix H to 10 CFR Part 50 to prevent brittle fracture of the reactor vessel.

For the above reasons, the Turkey Point Units 3 and 4 TS includes SR 4.4.9.1.2, which requires the removal and examination of reactor vessel material irradiation surveillance specimens to determine changes in material properties in accordance with the schedule in TS Table 4.4-5 and the requirements of 10 CFR Part 50, Appendix H. The results of these examinations are used to update TS Figures 3.4-2, 3.4-3, and 3.4-4.

The SURVEILLANCE REQUIREMENTS of TS 3/4.4.9.1 (i.e., SR 4.4.9.1.2, and associated TS Table 4.4-5, REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - WITHDRAWAL SCHEDULE), which are associated with these limits, specify the withdrawal schedule for the reactor vessel material specimens.

The BASES Section for this TS provides a detailed description of the basis for this LCO and the associated SURVEILLANCE REQUIREMENTS. The BASES state that the heatup and cooldown curves are recalculated when data from the surveillance specimens indicate a change in material properties that exceeds the limiting value of those properties that were used to develop the existing pressure and temperature limits. Finally, the TS BASES Section includes a table of the initial values of reactor vessel material properties and includes figures showing the effects of neutron fluence on the material characteristics and the predicted shifts in material characteristics.

The current Turkey Point Units 3 and 4 TS BASES provide background information on the use of the data obtained from material specimens. This background information clearly defines the purpose and relationship of this information to the requirements included in the regulations and the ASME Code. Therefore, the removal of the schedule for specimen withdrawal from the TS will not result in any loss of clarity related to regulatory requirements of Appendix H to 10 CFR

Part 50.

In accordance with the guidance provided by the NRC in GL 91-01, the reference to the reactor vessel material surveillance specimens removal table, along with TS Table 4.4-5 providing the schedule for the withdrawal of reactor vessel material surveillance specimens, may be removed from this surveillance requirement. For Turkey Point Units 3 and 4, SR 4.4.9.1.2, also specifies that the results of the reactor vessel material irradiation surveillance specimen examinations shall be used to update the TS figures for the pressure and temperature operating limits. This requirement of SR 4.4.9.1.2 is proposed to be retained.

Additionally, the BASES Section of this TS include a reference to the surveillance specimen withdrawal schedule, TS Table 4.4-5. That reference in the TS BASES is also being revised to reflect the removal of this TS table.

To obtain a readily available copy of the NRC-approved version of the specimen withdrawal schedule, FPL commits to incorporate and maintain the schedule for material specimen withdrawal in the Turkey Point Units 3 and 4 Updated Final Safety Analysis Report (UFSAR).

In addition to the implementation of the line-item improvements proposed in GL 91-01, FPL proposes to correct typographical errors in the TS BASES and to revise the reference in the TS BASES to the ASTM standard by which the fracture toughness properties of the ferritic materials in the reactor vessels are determined.

Proposed Technical Specifications Changes

To implement the line-item Technical Specification improvements of NRC GL 91-01, FPL proposes to amend the Turkey Point Units 3 and 4 Technical Specifications as detailed below:

1. TS INDEX, LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS (page viii): Delete the reference to TABLE 4.4-5 REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - WITHDRAWAL SCHEDULE

Justification: In accordance with GL 91-01, the table referenced in the index to the TS may be removed; accordingly, the reference to TS Table 4.4-5 in the index may also be removed upon implementation of the GL 91-01 line-item Technical Specification improvements.

2. TS 4.4.9.1.2 (page 3/4 4-30): Delete the wording "in accordance with the schedule in Table 4.4-5".

Justification: In accordance with GL 91-01, the TS Table 4.4-5 may be removed from the TS; additionally, it is proper and correct to remove all references to Table 4.4-5 from the TS. In accordance with GL 91-01, the surveillance requirement which

specifies that the results of these examinations shall be used to update the TS figures for the pressure and temperature operating limits is retained.

3. TS Table 4.4-5, REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - WITHDRAWAL SCHEDULE (page 3/4 4-34): Relocate TS Table 4.4-5 to the Turkey Point Updated Final Safety Analysis Report (UFSAR).

Justification: To implement the line-item improvements of GL 91-01, this table is proposed to be removed. Also, as required to implement this line-item improvement, FPL commits to incorporate and maintain the NRC-approved version of the specimen withdrawal schedule in the Turkey Point Units 3 and 4 UFSAR.

4. TS BASES 3.4.4.9 PRESSURE/TEMPERATURE LIMITS (page B 3/4 4-8 and B 3/4 4-9): Change the reference from "ASTM E 185-73" to "the version of the ASTM E 185 standard required by 10 CFR 50 Appendix H."

Justification: The ASTM standard, ASTM E 185-73, referenced in the Turkey Point Units 3 and 4 TS BASES is an outdated standard. Title 10 CFR 50 Appendix H states that the surveillance capsule withdrawal program must meet the requirements of the edition of ASTM E 185 that is current on the issue date of the ASME Code to which the reactor vessel was purchased. Title 10 CFR 50 Appendix H, II.B.1, further states "(f)or each capsule withdrawal after July 26, 1983, the test procedures and reporting requirements must meet the requirements of ASTM E 185-82 to the extent practical for the configuration of the specimens in the capsule."

The requirement that reactor vessel material surveillance specimens are to be removed and examined, in accordance with a specific edition of ASTM standard ASTM E 185 to determine changes in material properties, is required and defined in 10 CFR Part 50, Appendix H. Therefore, the specific reference in the TS BASES Section duplicates the requirements established in Title 10, Code of Federal Regulations. The control and requirements for the edition of ASTM E 185 to be used in establishing the test procedures and reporting requirements for the capsule specimens is sufficiently controlled by adherence to the Code of Federal Regulations.

5. TS BASES 3/4.4.9 PRESSURE/TEMPERATURE LIMITS (page B 3/4 4-9): Typographical error, change "tempera" to "tempera-"

Justification: This proposed change is intended to correct a typographic omission in that the hyphen is missing from a word intended to be hyphenated.

6. TS BASES 3/4.4.9 PRESSURE/TEMPERATURE LIMITS (page B 3/4 4-9):
Delete the reference to TS Table 4.4-5.

Justification: Since, in accordance with GL 91-01, the TS Table 4.4-5 may be removed from the TS, it is proper and correct to remove all references to that table from the TS BASES.

7. TS BASES 3/4.4.9 PRESSURE/TEMPERATURE LIMITS (page B 3/4 4-15):
Delete the reference to TS Figure 3.4-5.

Justification: The proposed change is intended to correct a typographical error in that Figure 3.4-5 does not exist in the Turkey Point Technical Specifications. The heatup and cooldown curves referred to in the TS BASES Section are actually TS Figure 3.4-2, 3.4-3 and 3.4-4.

10 CFR 50.36 Applicability

On July 22, 1993 (58 FR 39132), the Commission published a Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors, which establishes a specific set of objective criteria as guidance for determining which regulatory requirements and operating restrictions should be included in Technical Specifications. The policy statement identified four criteria to be used to define which of the current Technical Specification requirements should be retained or included in Technical Specifications and which LCOs could be relocated to licensee-controlled documents. Each of these criteria will be addressed below:

Criterion 1

Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

In accordance with the NRC policy statement, this criterion is intended to ensure that Technical Specifications control those instruments specifically installed to detect excessive reactor coolant system leakage. In addition, this criterion ensures that adequate instrumentation is installed to detect significant abnormal degradation of the reactor coolant pressure boundary so as to allow operator actions to either correct the condition or to shut down the plant safely.

The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the Updated Final Safety Analysis Report (UFSAR), the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). Since the proposed change

is not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary, this criterion is not applicable.

Criterion 2

A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

In accordance with the NRC policy statement, the purpose of this criterion is to capture those process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation. As long as these variables are maintained within the established values, risk to the public safety is presumed to be acceptably low. This criterion also includes active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits) needed to preclude unanalyzed accidents and transients.

The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the Updated Final Safety Analysis Report (UFSAR), the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). Since the proposed changes are not process variables, design features, or operating restrictions that are initial conditions of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, this criterion is not applicable.

Criterion 3

A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

In accordance with the NRC policy statement, the purpose of this criterion is to capture into the Technical Specifications only those structures, systems, and components that are part of the primary success path of the safety sequence analysis. Also captured by this criteria are those support and actuation systems that are necessary for items in the primary success path to successfully function. The primary success path for a particular mode of operation does not include backup and diverse equipment (e.g., rod withdrawal block which is a backup to the average power range monitor high flux trip in the startup mode, safety valves which are backup to low temperature overpressure relief valves during cold shutdown).

The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the Updated Final Safety Analysis Report (UFSAR), the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). Since the proposed changes are not structures, systems, or components that are part of the primary success path and which function or actuate to mitigate a Design Basis Accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, this criterion is not applicable.

Criterion 4

A structure, system, or component which operating experience or probabilistic safety assessment has been shown to be significant to public health and safety.

In accordance with the NRC policy statement, the purpose of this criterion is to ensure that licensees retain in their Technical Specifications LCOs, ACTION statements and SURVEILLANCE REQUIREMENTS for the following systems (as applicable), which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion:

- o Reactor Core Isolation Cooling/Isolation Condenser,
- o Residual Heat Removal,
- o Standby Liquid Control, and
- o Recirculation Pump Trip.

The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the Updated Final Safety Analysis Report (UFSAR), the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). Since the proposed changes are not structures, systems, or components which operating experience or probabilistic safety assessment have been shown to be significant to public health and safety, this criterion is not applicable.

Summary

The removal from the TS of the schedule for the withdrawal of reactor vessel material surveillance specimens will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of Appendix H to 10 CFR Part 50. In addition, to ensure that the surveillance specimens are withdrawn at the proper time, SR 4.4.9.1.2 indicates that the specimens shall be removed and examined to determine changes in their material properties, as required by Appendix H to 10 CFR Part 50. In accordance with GL 91-01, FPL commits to incorporate and maintain the NRC-approved version of the specimen withdrawal schedule in the Turkey Point Units 3 and 4 Updated Final Safety Analysis Report.

The typographical corrections in the TS BASES and the revision to the reference to ASTM E 185 are consistent with the guidance for implementing administrative corrections to the TS to ensure that references in the TS BASES are proper and correct.

Based upon a review of the four criterion from the NRC's Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (58 FR 39132), FPL has concluded that the relocation of TS Table 4.4-5 to the Turkey Point Updated Final Safety Analysis Report is acceptable.

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendments

These proposed amendments will remove from the Turkey Point Units 3 and 4 Technical Specifications (TS) the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). These proposed license amendments are consistent with the guidance provided to licensees by NRC Generic Letter (GL) 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." Additionally, these amendments propose to correct typographical errors in the TS BASES and to revise the reference in the TS BASES to the American Society for Testing and Materials (ASTM) standard by which the fracture toughness properties of the ferritic materials in the reactor vessels are determined.

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 amendment.

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 proposed license amendments do not involve a change in the probability or consequences of accidents previously evaluated since no physical changes to the plant, their operation, nor their procedures are involved. The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the Updated Final Safety Analysis Report (UFSAR), the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). These proposed license amendments are consistent with the guidance provided to licensees by NRC Generic Letter (GL) 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." The TS BASES are also revised to

remove references to the table being removed from the TS. In accordance with GL 91-01, FPL commits to maintain, the NRC-approved version of the specimen withdrawal schedule in the Turkey Point Units 3 and 4 UFSAR.

The current Turkey Point Units 3 and 4 TS BASES provide background information on the use of the data obtained from material specimens. This background information clearly defines the purpose and relationship of this information to the requirements included in the regulations and the ASME Code. Therefore, the removal of the schedule for specimen withdrawal from the TS will not result in any relaxation of the regulatory requirements of Appendix H to 10 CFR Part 50 and do not involve an increase in the probability or consequences of an accident previously evaluated.

The typographical corrections in the TS BASES and the revision to the reference to ASTM E-185 are consistent with the guidance for implementing administrative corrections to the TS to ensure that references in the TS BASES are proper and correct.

In summary, operation of the facility in accordance with the proposed amendment would not involve an increase in the probability or consequences of an accident previously evaluated.

- (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 proposed license amendments do not create the possibility of a new or different kind of accident from any accident previously evaluated since no physical changes to the plant, their operation, nor procedures are involved. The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the UFSAR, the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). These proposed license amendments are consistent with the guidance provided to licensees by NRC GL 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." The TS Bases are also revised to remove references to the table being removed from the TS.

The removal from the TS of the schedule for the withdrawal of reactor vessel material surveillance specimens will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of Appendix H to 10 CFR Part 50. In addition, to ensure that the surveillance specimens are withdrawn at the proper time, Surveillance Requirement 4.4.9.1.2 indicates that the specimens shall be removed and examined to

determine changes in their material properties, as required by Appendix H. In accordance with GL 91-01, FPL commits to maintain, the NRC-approved version of the specimen withdrawal schedule in the Turkey Point Units 3 and 4 UFSAR.

The typographical corrections in the TS BASES and the revision to the reference to ASTM E-185 are consistent with the guidance for implementing administrative corrections to the TS to ensure that references in the TS BASES are proper and correct.

The current Turkey Point Units 3 and 4 TS BASES provide background information on the use of the data obtained from material specimens. This background information clearly defines the purpose and relationship of this information to the requirements included in the regulations and the ASME Code. Therefore, the removal of the schedule for specimen withdrawal from the TS will not result in any relaxation of the regulatory requirements of Appendix H to 10 CFR Part 50 and would 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 a margin of safety.

The proposed license amendments do not involve physical changes to the plant, their operation, nor their procedures. The proposed license amendments do not create the possibility of a new or different kind of accident from any accident previously evaluated since no physical changes to the plant, their operation, nor their procedures are involved. The proposed changes are administrative in nature and involve the activity of relocating, from the Turkey Point Units 3 and 4 Technical Specifications (TS) to the UFSAR, the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule, by way of a license amendment to modify the TS, duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). These proposed license amendments are consistent with the guidance provided to licensees by NRC GL 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." The TS Bases are also revised to remove references to the table being removed from the TS.

The removal from the TS of the schedule for the withdrawal of reactor vessel material surveillance specimens will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of Appendix H to 10 CFR Part 50. In addition, to ensure that the surveillance specimens are withdrawn at the proper time, Surveillance Requirement 4.4.9.1.2 indicates that the specimens shall be removed and examined to determine changes in their material properties, as required by

Appendix H. In accordance with GL 91-01, FPL commits to maintain the NRC-approved version of the specimen withdrawal schedule in the Turkey Point Units 3 and 4 UFSAR.

The typographical corrections in the TS BASES and the revision to the reference to ASTM E-185 are consistent with the guidance for implementing administrative corrections to the TS to ensure that references in the TS BASES are proper and correct.

The current Turkey Point Units 3 and 4 TS BASES provide background information on the use of the data obtained from material specimens. This background information clearly defines the purpose and relationship of this information to the requirements included in the regulations and the ASME Code. Therefore, the removal of the schedule for specimen withdrawal from the TS will not result in any relaxation of the regulatory requirements of Appendix H to 10 CFR Part 50 and would not involve a reduction in a margin of safety.

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; therefore, the proposed changes do not involve a significant hazards consideration as defined in 10 CFR §50.92.