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

SUBJECT: Revs to 940719 proposed license amends to Licenses DPR-31 & DPR-41,revising TS 3/4.7.1.1 & associated bases,addressing max allowable reactor thermal power operation w/inoperable MSSVs,per NUREG-1431.

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FPL

OCT 20 1994

L-94-223
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
Operation at Reduced Power Levels with Inoperable MSSVs
(TAC No. M89935/M89934)

By letter L-94-176, dated July 19, 1994, Florida Power and Light (FPL) Company requested that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 be amended to revise Turkey Point Units 3 and 4 Technical Specification (TS) 3/4.7.1.1 and its associated BASES, which address maximum allowable reactor thermal power operation with inoperable main steam safety valves (MSSVs).

In response to a recent conversation with the staff, the revisions to the proposed license amendment (PLA) submitted by L-94-176 are attached and are consistent with the guidelines of NUREG-1431, "Standards Technical Specifications - Westinghouse Plants."

FPL has concluded that the proposed change to the Technical Specifications does not alter the original conclusion rendered in L-94-176 that no significant hazards consideration exists pursuant to 10 CFR §50.92.

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 are provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications changes.

In accordance with 10 CFR §50.91(b)(1), a copy of these proposed license amendments is being forwarded to the State Designee for the state of Florida.

The proposed amendments have been approved 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 250154

T. F. Plunkett
Vice President
Turkey Point Plant

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TFP/RJT/rt

Attachments

cc: S. D. Ebneter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point
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.

Cheryl A Kelly

Name of Notary Public (Type or Print)

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

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

My Commission expires
Commission No.

T. F. Plunkett is personally known to me.

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

DESCRIPTION OF AMENDMENTS REQUEST

Introduction

By letter dated January 20, 1994, Westinghouse issued Nuclear Safety Advisory Letter (NSAL) 94-001 which notified FPL of a deficiency in the basis of the Turkey Point Technical Specification (TS) 3/4.7.1.1, which allows the plant to operate at reduced power levels with a specified number of main steam safety valves (MSSVs) inoperable. Turkey Point's Technical Specification 3/4.7.1.1 is not based on a detailed analysis, but rather on the assumption that the maximum power level at which the plant is allowed to operate is a linear function of the available MSSV relief capacity. The linear function is identified in the BASES Section for TS 3/4.7.1.1 and is used to calculate the maximum allowable power level specified in TS Table 3.7-1. Under certain conditions and with typical conservative safety analysis assumptions, a Loss of Load/Turbine Trip transient from reduced power conditions may result in overpressurization of the main steam system when operated in accordance with the current Turkey Point TS 3/4.7.1.1. Consequently, the linear function assumption is not valid for all postulated cases. Instead, Westinghouse has developed an algorithm to calculate the allowed reduced power conditions. Based on the evaluation presented in NSAL 94-001, FPL proposes to amend Turkey Point Units 3 and 4 Technical Specification 3/4.7.1.1 and its associated BASES, which address maximum allowable reactor thermal power operation with inoperable main steam safety valves (MSSVs).

Discussion

The Loss of Load/Turbine Trip (LOL/TT) event (Loss of External Electrical Load) is analyzed in Chapter 14.1.10 of the Turkey Point Updated Final Safety Analysis Report (UFSAR). This analysis shows that core protection margins (Departure from Nucleate Boiling Ratio) are maintained, the reactor coolant system (RCS) will not overpressurize, and the main steam system will not overpressurize. The analysis assumes an immediate loss of steam relieving capability through the turbine and coincident loss of all main feedwater. No credit is taken for the direct reactor trip on turbine trip, since this trip would not be actuated for a loss of steam load. Rather, the transient is terminated by a reactor trip on high pressurizer pressure, overtemperature ΔT, or low-low steam generator water level. Secondary side overpressure protection is provided by actuation of the main steam safety valves (MSSVs), which are designed to relieve at least full power nominal steam flow. The analysis verifies that the MSSV capacity is sufficient to prevent secondary side pressure from exceeding 110 percent of the design pressure.

The UFSAR analyzes the LOL/TT transient from the full power initial condition, with cases examining the effects of assuming primary side pressure control and different reactivity feedback conditions. With fully operational MSSVs, it has been demonstrated that overpressure protection is provided for all initial power levels. However, for Turkey Point Units 3 and 4, like most other Westinghouse plants, TS 3.7.1.1 allows operation with a reduced number of operable MSSVs by

reducing the maximum allowable reactor power level. This Technical Specification is not based on a detailed analysis, but rather on the assumption that the maximum allowable initial power level is a linear function of the available MSSV relief capacity. Recently, Westinghouse has determined that the linear assumption was not valid for all postulated cases (reference 1).

The postulate, as described by Westinghouse, is if main feedwater is lost, a reactor trip is necessary to prevent secondary side overpressurization for all postulated core conditions. At high initial power levels a reactor trip is actuated early in the transient as a result of either high pressurizer pressure or overtemperature ΔT. For Turkey Point, the reactor trip occurs as a result of either the high pressurizer pressure setpoint or low-low steam generator water level setpoint being reached. The reactor trip terminates the transient and the MSSVs maintain steam pressure below 110% of the design value.

Westinghouse states in NSAL 94-001, that at lower initial power levels a reactor trip may not be actuated early in the transient. An overtemperature ΔT trip is not generated since the core thermal margins are increased at lower power levels. A high pressurizer pressure trip is not generated if the primary pressure control system functions normally. The reactor eventually trips on low steam generator water level, but this may not occur before steam pressure exceeds 110% of the design value if one or more MSSVs are inoperable in accordance with the Technical Specification.

Although from a licensing basis perspective, this condition may result in secondary side overpressurization in the event of a LOL/TT transient, Westinghouse has determined that this issue does not represent a substantial safety hazard. There are several mitigating factors which provide assurance that there is no loss of safety function to the extent that there is no major reduction in the degree of protection provided to the public health and safety. These include, but are not limited to, the following:

1. Adequate overpressure protection is provided at all power levels if all of the MSSVs are operable.

2. If a reactor trip does not occur but main feedwater flow is maintained, operation in accordance with TS Table 3.7-1 will not result in an overpressure condition.

3. In any LOL/TT transient, the atmospheric steam dump valves and/or condenser steam dump valves actuate to relieve energy from the steam generators prior to the opening of the MSSVs, and continue to relieve steam if the MSSVs do open. Since it is not a safety grade function, steam dump is not assumed to operate in the safety analysis; however, in reality it is the first line of defense in protecting the secondary system against overpressurization. It is very improbable that all these components would be inoperable coincident with inoperable MSSVs.

Proposed Technical Specifications Changes

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

1. Technical Specification 3.7.1.1, ACTION statement a. (pg 3/4 7-1): Add the following ACTION statement (the proposed new wording is in **bold**):

   With (3) reactor coolant loops and associated steam generators in operation and with one or more main steam line Code safety valves inoperable, and

   a. with a positive Moderator Temperature Coefficient, operation in MODES 1 and 2 may continue provided, that within 4 hours, either the inoperable valve(s) is restored to OPERABLE status or reduce the Power Range Neutron Flux High Trip Setpoint to the maximum allowable percent of RATED THERMAL POWER listed in Table 3.7-1; or otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.

   Justification: A reactor with a positive Moderator Temperature Coefficient (MTC) would tend to respond to the primary coolant heatup resulting from the LOL/Turbine Trip transient by increasing core reactivity. An increase in reactivity would translate into an increase in the reactor power level. By reducing either the Power Range Neutron Flux High Trip Setpoint or proceeding to Mode 3 (HOT STANDBY), the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator.

   In comparison, with a negative Moderator Temperature Coefficient, the primary coolant heatup resulting from the LOL/Turbine Trip transient would reduce the core power and heat input to the coolant. This would result in a lower required MSSV capacity to prevent secondary side overpressurization.

2. Technical Specification 3.7.1.1, ACTION statement b. (pg 3/4 7-1): Revise the ACTION statement to read (with the proposed new requirements in **bold**):

   With (3) reactor coolant loops and associated steam generators in operation and with one or more main steam line Code safety valves inoperable, and

   b. with a negative or zero Moderator Temperature Coefficient, operation in MODES 1, 2, and 3 may continue provided, that within 4 hours, either the inoperable valve(s) is restored to OPERABLE status or reduce power to less than or equal to the maximum allowable percent of RATED THERMAL POWER listed in Table 3.7-1; otherwise, be in at least HOT STANDBY within

the next 6 hours and in HOT SHUTDOWN within the following 12 hours.

Justification: This proposed change is consistent with the requirements specified in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants." The current Technical Specifications require that with an inoperable MSSV, both the reactor power level and the maximum allowable Power Range Neutron Flux High Trip Setpoint are reduced in accordance with the TS Table 3.7-1. However, NUREG-1431 requires only a reduction in the reactor power level with an inoperable MSSV, with no corresponding change in the maximum allowable Power Range Neutron Flux High Trip Setpoint. By reducing the reactor thermal power, the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. In addition, the current Technical Specifications require the unit to proceed to "COLD SHUTDOWN within the following 30 hours", if the unit is unable to meet the other required ACTIONS. Consistent with NUREG-1431, FPL proposes to change the terminal mode to "HOT SHUTDOWN within the following 12 hours."

3. Technical Specification Table 3.7-1 (pg. 3/4 7-2): Change the TS parameter from Maximum Allowable Power Range Neutron Flux High Trip Setpoint to the Maximum Allowable Power Level, and change the calculated values based on the revised algorithm methodology.

Justification: As stated above, the UFSAR only analyzes the LOL/TT transient from the full power initial condition. Therefore, the current setpoints listed in Table 3.7-1 of Technical Specifications 3/4.7.1.1 are not based on a detailed analysis, but rather on the assumption that the maximum power level at which the plant is allowed to operate is a linear function of available MSSV relief capacity. The linear function is identified in TS BASES Section 3/4.7.1.1. However, under certain conditions and with typical conservative safety analysis assumptions, a LOL/TT transient from reduced power conditions may result in overpressurization of the main steam system (> 110 percent). At lower initial power levels, a reactor trip may not be actuated early in the transient. An overtemperature ΔT trip is also not generated since the core thermal margins are increased at lower power levels. If the primary pressure control system functions properly, a high pressurizer pressure trip is not generated. This results in a longer time during which primary heat is transferred to the secondary system. The reactor eventually trips on low-low steam generator water level, but the trip may not occur before steam pressure exceeds 110 percent of the design value, if one or more MSSVs are inoperable in accordance with TS 3/4.7.1.1. Consequently, the linear function assumption is not valid. Instead, Westinghouse recommends that the following algorithm should be used to calculate the maximum allowable power level.

TS Table 3.7-1 and the associated BASES will be revised such that

the maximum allowable power level for operation with inoperable MSSVs is below the heat removing capability of the operable MSSVs. A conservative method to accomplish this is to reduce the actual reactor power level to a power level less than or equal to the calculated maximum allowed power level. To calculate this power level, the governing equation is the relationship:

$$q = m \Delta h$$

where:

q = the heat input from the primary side,

m = the steam flow rate,

Δh = the heat of vaporization at the steam relief pressure assuming no subcooled feedwater.

The algorithm proposed by Westinghouse to use for defining the maximum allowable power level is the following:

$$Hi\ \phi = (100/Q)\ \frac{(w_s\ h_{fg}\ N)}{K}$$

where:

$Hi\ \phi$ = Reduced THERMAL POWER for the most limiting steam generator expressed as a percent of RTP

Q = Nominal Nuclear Steam Supply System (NSSS) power rating of the plant (including reactor coolant pump heat), MWt

K = Conversion factor; 947.82 (Btu/sec)/Mwt

w_s = Minimum total steam flow rate capability of the operable MSSVs on any one steam generator at the highest MSSV opening pressure (including tolerance and accumulation) - (Lbm/sec).

For example, if the maximum number of inoperable MSSVs on any one steam generator is one, then w_s should be a summation of the capacity of the operable MSSVs at the highest operating pressure, excluding the highest capacity MSSV. If the maximum number of inoperable MSSVs per steam generator is three, then w_s should be a summation of the capacity of the operable MSSV at the highest operable MSSV operating pressure, excluding the three highest capacity MSSVs.

Note: The relief capacities of the MSSVs were calculated using the coefficient method for safety valves for nuclear vessels (Section III)

from the National Board of Boiler and Pressure Vessels. The relief capacities were also certified in accordance with ASME Section III Flow Capacity Tests. These capacities are consistent with Turkey Point's Small Break Loss of Coolant Accident (LOCA) and non-LOCA analysis assumptions.

h_{fg} = Heat of vaporization for steam at the highest MSSV opening pressure (including tolerance and accumulation) - (Btu/lbm)

N = Number of loops in plant

The values calculated from this algorithm were reduced by 5.2% to account for instrument and channel uncertainties, and then rounded down for additional conservatism.

The Westinghouse methodology summarized above was utilized in calculating the maximum allowable power level with 1, 2, and 3 inoperable MSSVs on any operating steam generator. Table 1 (of this attachment) compares the maximum allowable power level versus number of inoperable MSSVs with the power levels calculated using the linear function and the algorithm method of analysis.

4. Technical Specification 4.7.1.1 (pg. 3/4 7-1): Add the following statement to the SURVEILLANCE REQUIREMENTS:

> The provisions of Specifications 4.0.4 are not applicable for entry into MODE 3.

Justification: The current Technical Specifications provide no special provisions during surveillance testing of the MSSVs. Typically, the only credible event which would place 2 or more MSSV's out of service is the scheduled testing of the MSSVs in MODE 3. These tests are generally performed prior to commencing or completing a refueling and/or extended outage or in accordance with the requirements of the Inservice Testing Program.

NUREG-1431 states that the Surveillance Requirement is "only required to be performed in MODES 1 and 2." Consistent with the intent of NUREG-1431, by taking exception to the provisions of Specifications 4.0.4 in Mode 3, the unit can enter Mode 3, prior to meeting the requirements specified in the LIMITING CONDITIONS FOR OPERATION of TS 3.7.1.1.

The addition of this statement is consistent with the provisions provided for the surveillance testing of the Main Steam Line Isolation Valves in TS 4.7.1.5.

5. Technical Specification BASES 3/4.7.1.1 (pg. B 3/4 7-1):
Revise the BASES to reflect the proposed change to the algorithm methodology used to calculate the maximum allowable power level. Also correct a typographical error referencing an incorrect table.

Justification: The proposed change is made to ensure consistency with the proposed change from a linear function to the algorithm method of analysis.

Summary

The calculated maximum allowable power levels are intentionally conservative to bound the Loss of Load/Turbine Trip transient. This conservatism is evident in the fact that the calculated power level is based on the maximum number of inoperable MSSVs per loop. For example, in accordance with the proposed Technical Specifications, Turkey Point would reduce the reactor power level to 56% if a unit has up to one inoperable MSSV on each loop. This means that the plant would reduce the reactor power level regardless of whether there are one, two, or three inoperable MSSVs, as long as there is only one inoperable MSSV per loop.

Another conservatism in the algorithm (and the existing TS 3.7.1.1) is the term w_s, which is the minimum total steam flow rate capability of the operable MSSVs on any one steam generator. This value is conservative since it assumes that if one or more MSSVs are inoperable per loop, the inoperable MSSVs are the largest capacity MSSVs at the highest operable MSSV operating pressure, regardless of whether the largest capacity MSSVs or the smaller capacity MSSVs are inoperable. Thus the existing and the proposed Technical Specifications are conservative.

Reference

1. Letter, N. J. Liparulo (Westinghouse) to U.S. Nuclear Regulatory Commission, concerning "Westinghouse Nuclear Safety Advisory Letter (NSAL) 94-001, Operation at Reduced Power Levels with Inoperable MSSVs," dated 1/28/94.

TABLE 1

MAXIMUM ALLOWABLE POWER LEVEL WITH
INOPERABLE STEAM LINE SAFETY VALVES DURING THREE LOOP OPERATION

MAXIMUM NUMBER OF INOPERABLE SAFETY VALVES ON ANY OPERATING STEAM GENERATOR	MAXIMUM ALLOWABLE POWER LEVEL (PERCENT OF RATED THERMAL POWER)	
	CURRENT TECHNICAL SPECIFICATION REQUIREMENT (Linear Function Basis)	PROPOSED TECHNICAL SPECIFICATION REQUIREMENT (Algorithm Basis)
1	82	56
2	54	35
3	27	14

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendments

By letter dated January 20, 1994, Westinghouse issued Nuclear Safety Advisory Letter (NSAL) 94-001 which notified FPL of a deficiency in the basis of the Turkey Point Technical Specification (TS) 3/4.7.1.1, which allows the plant to operate at reduced power levels with a specified number of main steam safety valves (MSSVs) inoperable. Turkey Point's Technical Specification 3/4.7.1.1 is not based on a detailed analysis, but rather on the assumption that the maximum power level at which the plant is allowed to operate is a linear function of the available MSSV relief capacity. The linear function is identified in the BASES Section for TS 3/4.7.1.1 and is used to calculate the maximum allowable power level specified in TS Table 3.7-1. Under certain conditions and with typical conservative safety analysis assumptions, a Loss of Load/Turbine Trip transient from reduced power conditions may result in overpressurization of the main steam system when operated in accordance with the current Turkey Point TS 3/4.7.1.1. Consequently, the linear function assumption is not valid for all postulated cases. Instead, Westinghouse has developed an algorithm to calculate the maximum allowable power level. Based on the evaluation presented in NSAL 94-001, FPL proposes to amend Turkey Point Units 3 and 4 Technical Specification 3/4.7.1.1 and its associated BASES, which address maximum allowed reactor thermal power operation with inoperable main steam safety valves (MSSVs).

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 amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed maximum allowable power level values will ensure that the secondary side steam pressure will remain below 110 percent of the design value following a Loss of Load/Turbine Trip event, when one or more main steam safety valves (MSSVs) are declared inoperable. The proposed change will not impact the classification of the Loss of Load/Turbine Trip event as a

Condition II probability event (faults of moderate frequency) per ANSI - N18.2, 1973. Accordingly, since the proposed maximum allowable power level will maintain the capability of the MSSVs to perform their pressure relief function associated with a Loss of Load/Turbine Trip event, there will be no effect on the probability or consequences of an accident previously evaluated.

The proposed addition of ACTION statement b to TS 3.7.1.1, will not effect the probability or consequences of an accident previously evaluated, since the proposed action is consistent with the current Technical Specifications. Reducing the Power Range Neutron Flux High Trip Setpoint to the maximum power level will ensure the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. Entry into mode 3 does not require the availability of the MSSV, since plant conditions (i.e., not operating at reactor power) do not create the possibility of a secondary side overpressurization event.

In addition, the proposed change to Surveillance Requirement 4.7.1.1, will not effect the probability or consequences of an accident previously evaluated, since the proposed plant condition is an analyzed shutdown condition. Entry into Mode 3 for surveillance testing does not require the availability of the MSSV, since plant conditions (i.e., not operating at reactor power) do not create the possibility of a secondary side overpressurization event.

(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 changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve any change to the configuration of any plant equipment, and no new failure modes have been defined for any plant system or component. The proposed maximum allowable power level will maintain the capability of the MSSVs to perform their pressure relief function to ensure the secondary side steam design pressure is not exceeded following a Loss of Load/Turbine Trip event. Therefore, since the function of the MSSVs is unaffected by the proposed changes, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

The proposed addition of ACTION statement b to TS 3.7.1.1, will not create the possibility of a new or different kind of accident from any accident previously evaluated, since the proposed action is consistent with the current Technical Specifications. Reducing the Power Range Neutron Flux High Trip Setpoint to the maximum power level will ensure the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. Entry into mode 3 does not require the availability of the MSSV, since plant conditions

(i.e., not operating at reactor power) do not create the possibility of a secondary side overpressurization event.

In addition, the proposed change to Surveillance Requirement 4.7.1.1, will not create the possibility of a new or different kind of accident from any accident previously evaluated, since the proposed plant condition is an analyzed shutdown condition. Entry into Mode 3 for surveillance testing does not require the availability of the MSSV, since plant conditions (i.e., not operating at reactor power) do not create the possibility of a secondary side overpressurization event.

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

The proposed changes to the Technical Specifications do not involve a significant reduction in a margin of safety. The algorithm methodology used to calculate the maximum allowable power level is conservative and bounding since it is based on a number of inoperable MSSVs per loop; i.e., if only one MSSV in one loop is out of service, the required action to reduce power to the maximum allowable power level would be the same as if one MSSV in each loop were out of service. Another conservatism with the algorithm methodology is with the assumed minimum total steam flow rate capability of the operable MSSVs. The assumption is that if one or more MSSVs are inoperable per loop, the inoperable MSSVs are the largest capacity MSSVs, regardless of which capacity MSSVs are actually inoperable. Therefore, since the maximum allowable power level calculated for the proposed changes using the algorithm methodology are more conservative and ensure the secondary side steam design pressure is not exceeded following a Loss of Load/Turbine Trip event, this proposed license amendment will not involve a significant reduction in a margin of safety.

The proposed addition of ACTION statement b to TS 3.7.1.1, will not involve a significant reduction in a margin of safety, since the proposed action is consistent with the current Technical Specifications. Reducing the Power Range Neutron Flux High Trip Setpoint to the maximum power level will ensure the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. Entry into mode 3 does not require the availability of the MSSV, since plant conditions (i.e., not operating at reactor power) do not create the possibility of a secondary side overpressurization event.

In addition, the proposed change to Surveillance Requirement 4.7.1.1, will not involve a significant reduction in the margin of safety, since the proposed plant condition is an analyzed shutdown condition. Entry into Mode 3 for surveillance testing does not require the availability of the MSSV, since plant conditions (i.e., not operating at reactor power) do not create

the possibility of a secondary side overpressurization event.

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.