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

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, revising
 TS SR 4.8.1.1.2.g.7, allowing separation of 5-minute hot-
 start test from 24-h EDG test run, deleting associated
 footnote & adding new TS SR 4.8.1.1.2.g.14.

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L-95-081
10 CFR \$50.36
10 CFR \$50.90

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 Amendments -
Periodic Testing of Emergency Diesel Generators

In accordance with Title 10 Code of Federal Regulations \$50.90 (10 CFR \$50.90), Florida Power & 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) Surveillance Requirement 4.8.1.1.2.g.7, Emergency Diesel Generator (EDG) hot-start test within 5 minutes of the 24-hour test run. The proposed change would allow the separation of the 24-hour EDG test from the 5-minute test in accordance with the recommendations of NUREG 1366, "Improvements to Technical Specification Requirements," and NUREG 1431, "Standard Technical Specifications - Westinghouse Plants." The 5-minute EDG hot-start test will continue to be run in accordance with manufacturers' recommendations.

FPL has determined that the proposed license amendments are consistent with the Executive Order to reduce regulatory burden and, as such, are proposed as a Cost Beneficial Licensing Action (CBLA) with estimated savings over the remaining licensed operating terms of both units in excess of one-hundred thousand dollars.

FPL has also determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR \$50.92. A description of the amendments' request is provided in Attachment 1. The no significant hazards determination in support of the proposed TS changes is provided in Attachment 2. Attachment 3 provides the proposed revised TS.

In accordance with 10 CFR \$50.91 (b) (1), a copy of the proposed license amendments is 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.

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L-95-081
Page 2

FPL requests that the proposed amendments be issued by August 15, 1995, prior to the next scheduled refueling outage for Turkey Point Unit 3.

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

Very truly yours,



T. F. Plunkett
Vice President
Turkey Point Plant

MSD

Attachments

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC
T. P. Johnson, 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 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

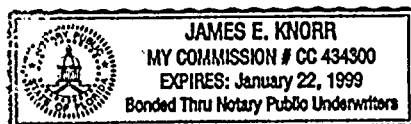
Subscribed and sworn to before me this
30th day of March, 1995.

James E. Knorr
Name of Notary Public (Type or Print)

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

My Commission expires 1-22-99
Commission No. 434300

T. F. Plunkett is personally known to me.



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DESCRIPTION OF AMENDMENTS REQUEST

INTRODUCTION

Florida Power and Light Company (FPL) proposes to revise the Turkey Point Units 3 and 4 Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.g.7, Emergency Diesel Generator (EDG) hot-start test within 5 minutes of the 24-hour EDG run. Currently, this SR contains a requirement to operate the EDG for 24 hours. During the first 2 hours, the EDG is to operate with its 2-hour-rated load and for the last 22 hours it is to operate at its continuous-rated load. Additionally, this SR requires that, within 5 minutes after completing this 24-hour test, the emergency buses must be deenergized and loads shed with a subsequent fast EDG start and full Engineered Safety Features (ESF) load acceptance. The proposed change would revise the TS to allow for the separation of the 5-minute hot-start test from the 24-hour EDG test run.

DESCRIPTION OF PROPOSED CHANGE

FPL proposes to change the following Technical Specification Surveillance Requirement.

Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.g.7, "24-hour EDG Test with Subsequent 5-Minute Hot-Start Test": Revise Surveillance Requirement 4.8.1.1.2.g.7 to allow for the separation of the 5-minute hot-start test from the 24-hour EDG test run and delete associated footnote. Add new TS SR 4.8.1.1.2.g.14, and associated footnote, for performance of 5-minute hot-start test.

Justification: This change is proposed consistent with NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," and NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements." Specifically, SR 4.8.1.1.2.g.7 is revised to allow for the separation of the 5-minute hot-start test from the 24-hour EDG test run.

The safety function of the EDGs is to supply AC electrical power to plant safety systems whenever the preferred AC power supply is unavailable. Corresponding to their importance to safety, EDGs have extremely detailed TS SRs compared to other pieces of mechanical and electrical equipment in a nuclear power plant. Through SRs, the ability of the EDGs to meet their load and timing requirements is confirmed.

The Technical Specifications Improvement Program (TSIP) was established by the NRC in 1984 to provide the framework for rewriting and improving the Technical Specifications. As an element of the TSIP, all TS SRs were comprehensively examined. The results of that effort are presented in NUREG-1366. The study found that, while some testing is essential to verify equipment and system operability, safety can be improved, equipment degradation decreased, and unnecessary personnel burden relaxed by reducing the amount of testing or revising the scheme of surveillance testing.

Section 10.1 of NUREG-1366 discusses the NRC's findings and concludes that the current EDG requirements are stringent. A specific NUREG-1366 finding is that there is no safety reason for performing a startup of an EDG within 5 minutes of the 24-hour test run.

The 5 minute hot-start test is performed to verify that the EDG can restart from a hot condition, such as subsequent to shutdown from normal surveillances, and to achieve the required voltage and frequency within a specified time period. Currently, Turkey Point TS 4.8.1.1.2.g.7, contains a footnote which states that, if the EDG hot-start test with full ESF load acceptance is not satisfactorily completed, it is not necessary to repeat the 24-hour test. The footnote goes on to state that, instead, the EDG may be operated at its continuous rating for 1 hour or until operating temperature has stabilized.

Conducting the hot-start test after the EDGs have been operated at their full load rating for one hour, or until operating temperature has stabilized, fulfills the intent of conducting the test following the 24-hour load test. The tests under the proposed change would be carried out under conditions which are nearly identical to those required for previous tests because the EDGs would be operated until temperature stabilization is achieved which is the objective in both cases. The Turkey Point EDG manufacturers continue to concur with the TS wording that hot conditions be defined as having the EDGs run at full load conditions for one hour or until operating temperature has stabilized. The proposed change does not significantly alter the requirements for either the 24-hour test run or the hot-start test with full ESF load test and provides equivalent assurance regarding the EDG operability and reliability.

Separating these two required tests gives the plant operators added flexibility and prevents critical path complications during the outages. As a result of the testing sequence currently dictated by the Turkey Point TS,

a minimum of 24 hours of critical path time is spent each refueling outage performing the 24-hour load test. By separating the two surveillance requirements, the 24-hour runs can be completed off critical path time.

The NRC issued Generic Letter (GL) 93-05, "LINE-ITEM TECHNICAL SPECIFICATIONS IMPROVEMENTS TO REDUCE SURVEILLANCE REQUIREMENTS FOR TESTING DURING POWER OPERATION," in September 1993. Generic Letter 93-05 provided guidance to assist licensees in preparing a license amendment request to implement the NUREG-1366 surveillance requirement changes. FPL has reviewed the proposed GL TS wording and compared it to NUREG-1431 and other recent utility submittals. FPL has chosen to follow the guidance of NUREG-1431 and the precedent being set by other utilities in this area. The proposed change is consistent with the Westinghouse Standard Technical Specifications, NUREG-1431 and the recommendation in NUREG-1366.

SUMMARY

The proposed modification of the Turkey Point Technical Specifications would permit testing of the EDGs for a 24-hour test run and a hot-start with full ESF load acceptance separately and independently.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Proposed License Amendments

Florida Power and Light Company (FPL) proposes to revise the Turkey Point Units 3 and 4 Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.g.7., Emergency Diesel Generator (EDG) hot-start test within 5 minutes of the 24-hour EDG run. Currently, this SR contains a requirement to operate the EDG for 24 hours. During the first 2 hours, the EDG is to operate with its 2-hour-rated load and for the last 22 hours it is to operate at its continuous-rated load. Additionally, this SR requires that, within 5 minutes after completing this 24-hour test, the emergency buses must be deenergized and loads shed with a subsequent fast EDG start and full Engineered Safety Features (ESF) load acceptance. The proposed change would revise the TS to allow for the separation of the 5-minute hot-start test from the 24-hour EDG test run.

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 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 proposed TS changes would revise the EDG surveillance criteria to allow the EDG hot-start test with full ESF load acceptance to be performed separately and independently from the 24-hour EDG run. The proposed SRs would continue to demonstrate that the objectives of these two tests are met. Specifically, the EDGs are shown to be: 1) capable of starting and running continuously at full load capability for an interval not less than 24 hours, and 2) capable of restarting from a full load temperature condition. The

L-95-081
Attachment 2
Page 3

Summary

Based on the above discussion, FPL has determined that the proposed amendments' 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.

proposed changes would not affect the EDGs' ability to support mitigation of the consequences of any previously evaluated accident. Additionally, the proposed changes to the SRs do not affect the initiating assumptions or progression of any accident sequence.

Therefore, operation of the facility would not involve an increase in the probability or consequences of an accident previously analyzed.

- (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 TS SR changes do not require any physical changes to the plant or equipment, and do not impact any design or functional requirements of the EDGs. The proposed changes do not create any plant configurations which are prohibited by the TS. The proposed changes continue to meet the EDG test objectives associated with demonstrating EDG operability.

Therefore, 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.

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

The proposed TS SR changes do not require any physical changes to the plant or equipment and do not impact any design or functional requirements of the EDGs. Surveillance testing in accordance with the proposed TS will continue to demonstrate the ability of the EDGs to perform their intended function of providing electrical power to Engineered Safety Features systems needed to mitigate design basis transients, consistent with the plant safety analyses.

Therefore, operation of the facility in accordance with the proposed amendments would not involve a reduction in a margin of safety.