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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co. 05000251
 AUTH. NAME AUTHOR AFFILIATION
 PLUNKETT, T.F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Informs that util revised attachments 1 & 3 of 950330 ltr.
 Proposed license amends revs do not alter original
 conclusion rendered in attachment 2 to ltr.

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L-95-141
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 - Revision
Periodic Testing of Emergency Diesel Generators
(TAC Nos. M91911 /M91912)

By letter L-95-81, dated March 30, 1995, Florida Power and Light Company (FPL) requested 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.

In response to a recent conversation with the NRC staff, FPL has revised Attachment 1, "Description of Amendments" and Attachment 3, "PROPOSED TECHNICAL SPECIFICATIONS" Insert A, of letter L-95-81. The marked-up Technical Specification pages 3/4 8-8 and B 3/4 8-5 included in letter L-95-81 are not affected by the attached.

Additionally, FPL has concluded that the proposed license amendments' revisions do not alter the original conclusion rendered in Attachment 2 to letter L-95-81 that no significant hazards considerations exist pursuant to 10 CFR \$50.92.

In accordance with 10 CFR \$50.91(b)(1), a copy of these proposed license amendments' revisions are being forwarded to the State Designee for the State of Florida.

The proposed revisions have been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

Should there be any questions, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Plant

MSD

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PDR

Attachments

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

ADD 1

STATE OF FLORIDA

COUNTY OF DADE

)
) ss.
)

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

Subscribed and sworn to before me this

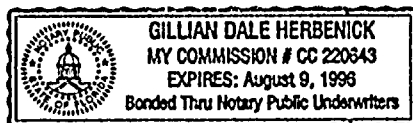
5th day of May, 1995.

Gillian Dale Herbenick
Name of Notary Public (Type or Print)

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

My Commission expires 8-9-96
Commission No. C.C. 220643

T. F. Plunkett is personally known to me.





(REVISED) ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

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. As concluded in NUREG 1366 and as discussed in the BASES of NUREG 1431, "Standard Technical Specification - Westinghouse Plants," the time period for achieving stabilized EDG temperatures (hot condition) is 2 hours. As noted in NUREG 1366, the only requirement should be that the hot-start test is performed within 5 minutes of operating the diesel generator at its continuous rating for 2 hours or until operating temperatures have stabilized.

Conducting the hot-start test after the EDGs have been operated at their full load rating for two hours, 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 concur that hot conditions be defined as having the EDGs run at full load conditions for two hours 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

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Attachment 1 (Revised)
Page 3 of 3

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.

(Revised) Attachment 3

PROPOSED TECHNICAL SPECIFICATIONS

Marked-up Technical Specification Pages:

Revised Insert A to pg. 3/4 8-8

New Insert A

14) Operating the diesel generator between 2300-2500 kW (Unit 3), 2650-2850 kW (Unit 4)* for 2 hours, or until operating temperature has stabilized, whichever is longer, and, within 5 minutes of shutting down the diesel generator following this run, performing Specification 4.8.1.1.2.g.4)b).

*Momentary transients outside of these load bands do not invalidate this test.

