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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.Amends would use changed setpoint presentation format for RPS & ESFAS instrumentation setpoints.

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FPL

L-95-137
10 CFR §50.90

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

Gentlemen:

Re: Turkey Point Units 3 & 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Implementation of Changed Column Format for Reactor Protection System (RPS) and Engineered Safety Feature Actuation System (ESFAS) Setpoints

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 modify the Turkey Point Units 3 & 4 Technical Specification 2.2, "Limiting Safety System Settings, Reactor Protection System Instrumentation Setpoints" and Technical Specification 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation Limiting Condition for Operation" and their associated BASES. The proposed amendments would use a changed setpoint presentation format for the Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) instrumentation setpoints contained in Technical Specification Tables 2.2-1 and 3.3-3 while retaining the approved Westinghouse five-column instrument setpoint methodology currently being used for establishing those setpoints. The intent of the amendments is to eliminate the need for minor administrative license amendments to these tables that do not impact either the Trip Setpoints or the Safety Analysis Limits.

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 amendments request is provided in Attachment 1. The no significant hazards determination in support of the proposed Technical Specification changes is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications.

By FPL letter L-95-131, dated May 5, 1995, FPL submitted proposed license amendments requesting implementation of Westinghouse's "Revised Thermal Design Procedure (RTDP)" methodology. The Technical Specification changes proposed in the application contained herein do not reflect the application of Westinghouse's RTDP." Accordingly, dependent on the schedule for the review and approval of the RTDP proposed license amendments and these "5 to 2 column" format changes, FPL calls to the staff's attention that revised proposed Technical Specifications pages for either proposed license amendment may need to be submitted.

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

The proposed license amendments have been reviewed 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
Vice President
Turkey Point Plant

EJW

Attachments

cc: S. D. Ebneter, 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

Subscribed and sworn to before me this

24 day of May, 1995.

Cheryl A Kelly

Name of Notary Public (Type or Print)

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

CHERYLL 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.

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

Turkey Point Technical Specifications 2.2 and 3/4.3.2 contain the allowable settings for the Reactor Protection System (RPS) and the Engineered Safety Features Actuation System (ESFAS) instrument setpoints, respectively. Administrative changes to the Technical Specifications have been required as a result of changes to plant instrumentation which do not affect safety margins. These administrative changes are the result of the level of detail presented in the current Technical Specifications for the instrumentation setpoints. The purpose of these proposed license amendments is to reduce the unnecessary level of detail contained in Technical Specifications 2.2 and 3/4.3.2 and their respective BASES. It is expected that the implementation of these proposed license amendments will reduce the number of future proposed license amendments required to be submitted to the NRC to amend the existing Technical Specifications.

Background

On August 26, 1991, the Nuclear Regulatory Commission (NRC) issued License Amendments 146 and 141 to the Turkey Point Units 3 and 4 operating licenses DPR-31 and DPR-41, respectively. The amendments consisted of changes to the Technical Specifications in response to Florida Power & Light Company's (FPL's) application transmitted by letter dated December 19, 1990 and supplemented on April 24, June 3, and July 8, 1991. The amendments revised Technical Specification 2.2, "Limiting Safety Systems Settings" and Technical Specification 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation," and their BASES, for implementation of the Westinghouse five-column setpoint methodology.

These proposed license amendments revise the Technical Specifications to a two-column format while retaining the Westinghouse five-column setpoint methodology for determining the setpoints. The amendments would change the level of detail contained in Technical Specification Table 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints." The Westinghouse five-column setpoint methodology will be procedurally controlled and maintained, through the use of controlled engineering/plant drawings and plant procedures.

Discussion

The methodology used in the five-column approach is a "square root of the sum of the squares," which is described in detail in Westinghouse topical report WCAP-12745, "Westinghouse Setpoint Methodology for Protection Systems, Turkey Point Units 3 & 4", Westinghouse, Proprietary, November 1990. Topical Report WCAP-12745 was submitted to the NRC as an attachment to FPL letter L-90-417, "Reactor Protection System Setpoints," dated August 26, 1990. The Westinghouse methodology statistically combines the potential instrument uncertainties in the RPS and ESFAS instrumentation to determine the channel statistical allowance (CSA). The total allowance (TA), which is defined as the difference between the safety analysis limit (SAL) and the nominal trip setpoint (NTS), is then compared to the CSA to determine the margin and allowable values. The five-column approach provides numerical values for "TA", "S" and "Z", where "S" is the value for sensor uncertainties, and "Z" is the combination of the remaining independent uncertainty variables. A value for "R", the rack uncertainties, is measured in the field and, when combined with "S" and "Z", is used to determine if the total allowance has been exceeded.

The five-column format in the Technical Specification is shown below:

Current Level of Technical Specification Detail
Table 2.2-1 and Table 3.3-3

Functional Unit	Allowance (TA)	Z	S	Trip Setpoint	Allowable Value

The proposed license amendments will change the format of Technical Specification Tables 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints" to a "two-column" format as shown below:

Proposed Technical Specifications
Tables 2.2-1 and Table 3.3-3

Functional Unit	Allowable Value	Trip Setpoint

where:

Allowable Value is the Nominal Trip Setpoint conservatively adjusted to include deviations due to rack drift and/or calibration tolerances.

Trip Setpoint is the nominal value specified in Tables 2.2-1 and 3.3-3 at which the Reactor Trips are set for each functional unit.

The proposed amendments remove reference to Equation 2.2-1 ($Z + R + S \leq TA$), and the "Z", "R", "S" and "TA" terms from Technical Specification 2.2-1, Table 2.2-1, Technical Specification 3/4.3.2, Table 3.3-3 and the BASES. The Technical Specifications are proposed to be revised to include only the Allowable Value and the Trip Setpoint (NTS) Value for a particular Functional Unit. The ACTION statements in Technical Specifications 2.2.1 and 3.3.2 are revised to reflect the changed format; however the intent of the ACTION statements is not changed.

The existing five-column format provides for as-found operability determinations using Equation 2.2-1. The mechanism for operability evaluations will be maintained in controlled plant procedures and drawings using the Westinghouse WCAP topical reports established as the Turkey Point Plant licensing basis by NRC letter, "Turkey Point Units 3 and 4 - Issuance of Amendments Re: Reactor Protection System Setpoints (TAC Nos. 79402 and 79403), dated August 26, 1991 (From Rajender Auluck to J. H. Goldberg).

Description of Proposed Changes

The following changes in plant Technical Specifications shown in Attachment 3 are proposed:

1. T.S.2.2 - Technical Specification 2.2, including Table 2.2-1, is proposed to be revised to use a changed column format for the RPS instrumentation setpoints that includes the Functional Unit,

Allowable Value and Trip Setpoint and the associated notes. The values of "TA", "Z" and "S" are to be removed from the table and ACTION statements. The ACTION statements will refer to only the Trip Setpoints and the Allowable Value that are provided in Table 2.2-1. The ACTION statements in Technical Specification 2.2.1 are proposed to be changed to:

a. *With a Reactor Trip System Instrumentation or Interlock Setpoint less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 2.2-1, adjust the setpoint consistent with the Trip Setpoint value within the permissible calibration tolerance.*

b. *With the Reactor Trip System Instrumentation or Interlock Setpoint less conservative than the value shown in the Allowable Value column of Table 2.2-1, either:*

   1. *Adjust the Setpoint consistent with the Trip Setpoint value of Table 2.2-1 and determine within 12 hours that the affected channel is OPERABLE; or*

   2. *Declare the channel inoperable and apply the applicable ACTION statement requirement of Specification 3.3.1 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value.*

Justification - Technical Specification Table 2.2-1, "Reactor Trip System Instrumentation Setpoints," provides the following values that are defined in the Westinghouse five-column setpoint methodology as described in Westinghouse topical report WCAP-12745:

Total Allowance (TA);
Calculated Value (Z);
Calculated Value (S);
Trip Setpoint (NTS);
Allowable Value (AV);

These values, from the Westinghouse five-column setpoint methodology, are documented in Turkey Point Plant controlled drawings. The removal of the "Z", "S" and "TA" terms from the Technical Specifications will not change the methodology used to evaluate plant RPS setpoints but only change the format in which information is presented in the Technical Specifications.

Controlled plant drawings contain, and will continue to contain, the necessary information concerning the calculation of each setpoint using the previously approved setpoint methodology. Changes to the "Z", "S" and "TA" terms contained in the controlled plant drawings can only be changed without prior NRC review and approval providing an evaluation pursuant to 10 CFR §50.59 is successfully completed.

2. T.S.3/4.3.2 - Technical Specification 3.3.2, including Table 3.3-3, is proposed to be revised to use a changed column format for the ESFAS instrumentation setpoints that includes the Functional Unit, Allowable Value and Trip Setpoint and the associated notes. The values of "TA", "Z" and "S" are to be removed from the table and ACTION statements. The ACTION statements will refer to only the Trip Setpoints and the Allowable Values that are provided in Table 3.3-3. The ACTION statements in Technical Specification 3.3.2 are proposed to be changed to:

a. *With ESFAS Instrumentation or Interlock Setpoint less conservative than the value shown in the Trip Setpoint column, but more conservative than the value shown in the Allowable Value column of Table 3.3-3, adjust the setpoint consistent with the Trip Setpoint value within the permissible calibration tolerance.*

b. *With ESFAS Instrumentation or Interlock Setpoint less conservative than the value shown in the Allowable Value column of Table 3.3-3, either:*

    1. *Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-3 and determine within 12 hours that the affected channel is OPERABLE; or*

    2. *Declare the channel inoperable and apply the applicable ACTION statement requirement of Specification 3.3.2 until the channel is restored to OPERABLE status with its setpoint adjusted consistent with the Trip Setpoint value.*

Justification - Technical Specification Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints" provides the following values that are defined in the Westinghouse five-column setpoint methodology as described in Westinghouse topical report WCAP-12745:

Total Allowance (TA);
Calculated Value (Z);
Calculated Value (S);
Trip Setpoint (NTS);
Allowable Value (AV);

These values, from the Westinghouse five-column setpoint methodology, are documented in Turkey Point Plant controlled drawings. The removal of the "Z", "S" and "TA" terms from the Technical Specifications will not change the methodology used to evaluate plant ESFAS setpoints but only change the format in which information is presented in the Technical Specifications. Controlled plant drawings contain, and will continue to contain, the necessary information concerning the calculation of each setpoint using the previously approved setpoint methodology. Changes to the "Z", "S" and "TA" terms contained in the controlled plant drawings can only be changed without prior NRC review and approval providing an evaluation pursuant to 10 CFR §50.59 is successfully completed.

3. T.S.2.2 and 3/4.3.2 BASES - The proposed changes to the BASES are consistent with the proposed removal of terms "Z", "S", "R", "TA", and Equation 2.2-1 and revision to the Trip Setpoint Value and the Allowable Value. Technical Specification ACTION statements in Technical Specifications 2.2.1 and 3.3.2 are revised to reflect the changed format; however the intent of the ACTION statements is not changed.

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.

Criterion 1 Analysis

All instrumentation required by current Technical Specifications will continue to be addressed and required by the Turkey Point Technical Specifications. The Westinghouse five-column setpoint methodology will continue to be used and will be procedurally controlled and maintained through the use of controlled engineering/plant drawings and plant procedures. The proposed changes to the RPS and ESFAS instrumentation setpoint presentation format will eliminate the need for proposed license amendments that would be required due to minor instrumentation changes. The amendments will only change the level of detail contained in Technical Specification Tables 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints."

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.

Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the Turkey Point Technical Specifications. Additionally, 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, and as currently included in the Technical Specifications, are not affected by these amendments. The amendments will only change the level of detail contained in Technical Specification Tables 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints". The Westinghouse setpoint five-column methodology will continue to be used and will be procedurally controlled and maintained through the use of controlled engineering/plant drawings and plant procedures. No physical modifications to the facility are required to implement these proposed changes.

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).

Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The proposed changes to the RPS and ESFAS instrumentation setpoint presentation format will eliminate the need for proposed license amendments that would be required due to minor instrumentation changes. The amendments will change the level of detail contained in Technical Specification Tables 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints". The Westinghouse five-column setpoint methodology will be procedurally controlled and maintained through the use of controlled engineering/plant

drawings and plant procedures. The proposed format is consistent with the format found in the Standard Technical Specifications. No physical modifications to the facility are required to implement these proposed changes.

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:

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

Criterion 4 Analysis

The Turkey Point Technical Specifications which address systems for 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 are not impacted by the proposed license amendments. The amendments will only change the level of detail contained in Technical Specification Tables 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints." The Westinghouse five-column setpoint methodology will be procedurally controlled and maintained through the use of controlled engineering/plant drawings and plant procedures. No physical modifications to the facility are required to implement these proposed changes.

Summary

The proposed changes to the RPS and ESFAS instrumentation setpoint presentation format will eliminate the need for proposed license amendments that would be required due to minor instrumentation changes. The amendments will change the level of detail contained in Technical Specification Tables 2.2-1, "Reactor Trip System Instrumentation Trip Setpoints" and Table

3.3-3, "Engineered Safety Features Actuation System Instrumentation Trip Setpoints". The Westinghouse five-column setpoint methodology will be procedurally controlled and maintained through the use of controlled engineering/plant drawings and plant procedures. The proposed format is consistent with the format found in the Improved Standard Technical Specifications (NUREG 1431). The BASES for Technical Specifications and the ACTION statements associated with Technical Specifications 2.2 and 3.3.2 have been editorially changed to reflect the revised RPS and ESFAS setpoint presentation format. No physical modifications to the facility are required to implement these proposed changes.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

Florida Power & Light Company (FPL) proposes to change the Turkey Point Units 3 and 4 Technical Specifications by revising Technical Specification 2.2, "Limiting Safety System Settings, Reactor Protection System Instrumentation Setpoints" and Technical Specification 3/4.3.2, "Engineered Safety Features Actuation System Instrumentation Limiting Condition for Operation" and their associated BASES. The proposed amendments would use a changed setpoint presentation format for the Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) instrumentation setpoints contained in Technical Specification Tables 2.2-1 and 3.3-3 while retaining, for establishing those setpoints, the approved Westinghouse five-column instrument setpoint methodology currently being used. The intent of the amendments is to eliminate the need for minor administrative license amendments to these tables that do not impact either the Trip Setpoints or the Safety Analysis Limits.

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.

No changes to the Reactor Trip System instrumentation setpoints, Engineered Safety Feature Actuation System (ESFAS) instrumentation setpoints, or the Turkey Point Plant licensing basis (NRC-approved, Westinghouse five-column setpoint methodology, as documented in Westinghouse topical

report WCAP-12745P), is being made. The changes proposed reduce the level of detail in the Technical Specifications and place that detailed information in controlled procedures, drawings and the Final Safety Analysis Report. Since the setpoints and methodology remain the same, the changes proposed by this submittal will not increase the probability or consequences of an accident previously evaluated.

(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.**

These proposed changes remove from the Technical Specifications a level of detail which will be maintained in controlled procedures and drawings. The Turkey Point Plant licensing basis (NRC-approved, Westinghouse five column setpoint methodology, as documented in Westinghouse topical report WCAP-12745P), continues to be used to calculate the Reactor Trip System and Engineered Safety Feature Actuation System setpoints. No changes to Reactor Trip System or ESFAS instrumentation setpoints are proposed. Since the same methodology will be used to determine the setpoints and no setpoints are changed, the possibility that a new or different kind of accident from any previously evaluated will 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 Turkey Point Plant licensing basis (NRC-approved, Westinghouse five column setpoint methodology, as documented in Westinghouse topical report WCAP-12745P), continues to be used to calculate the Reactor Trip System and Engineered Safety Feature Actuation System setpoints. No changes to the Reactor Trip System or ESFAS instrumentation setpoints are proposed. Since the same methodology will be used to determine the setpoints, and no setpoints are changed by this submittal, this change does not involve a reduction in a margin of safety.

Based on the above, 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, (3) involve a significant reduction in a margin of safety; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR §50.92.