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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251

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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 to achieve consistency throughout document by removing
outdated matl, incorporating administrative clarifications &
corrections & correcting typos.

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JUL 26 1995

L-95-192
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
Administrative Update - 1995

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 Specifications. The purpose of this amendment is to revise the Technical Specifications to achieve consistency throughout this document by (a) removing outdated material, (b) incorporating administrative clarifications and corrections, and (c) correcting typographical errors. Comparisons have been made with NUREG-1431, "Standard Technical Specifications - Westinghouse Plants", and changes are requested to ensure consistency with that NUREG.

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

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 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

CDV

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

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an FPL Group company

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STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

T. F. Plunkett being first duly sworn, deposes and says:

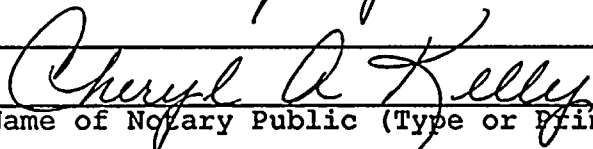
That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

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

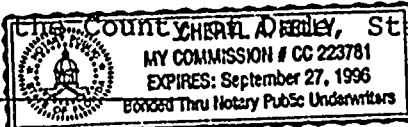
Subscribed and sworn to before me this

26 day of July, 1995.


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

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

The proposed amendments revise the Turkey Point Units 3 and 4 Technical Specifications (TS) to achieve consistency throughout the TS by (a) removing outdated material, (b) incorporating administrative clarifications and corrections, and (c) correcting typographical errors. These changes represent an administrative update to the Turkey Point Units 3 and 4 TS. Each of the proposed changes is discussed in detail below.

Background

Through periodic examinations of Turkey Point Units 3 and 4 TS, several administrative inconsistencies were noted throughout the TS. These inconsistencies were then cross-checked and verified to actually be in error, based on a review of NUREG-1431 and the present TS. Also, the BASES for the Ultimate Heat Sink (UHS) are given further clarification on its limitations, based on a safety evaluation completed on the Component Cooling Water (CCW) heat exchanger performance monitoring program. FPL proposes to amend the following TS to correct these administrative errors, add clarification, and maintain consistency throughout Turkey Point Units 3 and 4 TS.

Discussion and Description of Proposed Changes

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

1. TS BASES 3/4.1.3 - Movable Control Assemblies

Recommendation: Change the maximum step count reached from 231 to 230 on the step counter.

Justification: Newer Westinghouse plants can reach the 231 limit, but Turkey Point Units 3 and 4 can only be withdrawn to 230 steps. FPL proposes to change the indicated requirement to between 200 and 230 vice 231.

2. TS 4.2.2.2.c.1 - MIDS

Recommendation: Correct symbol for standard deviation from "j" to " σ_j ".

Justification: " σ_j " is the correct symbol for standard deviation, however the " σ " was inadvertently omitted.

3. TS 4.3.1.1 - Reactor Trip System Instrumentation

Recommendation: Capitalize 'Reactor' where it is stated "Each reactor Trip System..."

Justification: To maintain consistency throughout the TS, Reactor Trip System should be capitalized.

4. TS Table 3.3-1 - Reactor Trip System Instrumentation

Recommendation: Convert Item 18.B to Item 18.b. Delete one of the 'per' words in ACTION 2.b.

Justification: To maintain consistency throughout the TS numbering system, the letters following Item 18 should be lowercase. Only one 'per' is required in ACTION 2.b.

5. TS 3.9.4 - Containment Building Penetrations

Recommendation: Change 3.9.4.b.2) from "at least 23 feet of water above the fuel..." to "at least 23 feet of water above the reactor vessel flange ..."

Justification: To maintain consistency throughout the TS and with current operating procedures, 'fuel' should be changed to 'flange' (i.e., TS 3.9.8.1, 3.9.8.2, 3.9.10). This change would be a more conservative requirement than the existing requirement of 23 feet of water above the fuel, and is requested to eliminate confusion when compared with other specifications governing refueling operations.

6. TS 3.12.1.c - Monitoring Program

Recommendation: Change reference to 'Semiannual Radioactive Effluent Release Report' to 'Annual Radioactive Effluent Release Report'.

Justification: The required Radioactive Effluent Release Report is generated on an annual basis now vice the previous semiannual interval. This change will remove outdated references from the existing TS.

7. TS 3.12.2.b - Land Use Census

Recommendation: Change reference to 'Semiannual Radioactive Effluent Release Report' to 'Annual Radioactive Effluent Release Report'.

Justification: The required Radioactive Effluent Release Report is generated on an annual basis now vice the previous semiannual interval. This change will remove outdated references from the existing TS.

8. TS BASES 3/4.2.4 - Quadrant Power Tilt Ratio

Recommendation: Delete one of the words, 'action', in the third paragraph.

Justification: Only one 'action' word is required.

9. TS BASES 3/4.7.4 - Ultimate Heat Sink

Recommendation: Change the BASES for the Ultimate Heat Sink (UHS) to read as follows:

The limit on ultimate heat sink temperature in conjunction with the SURVEILLANCE REQUIREMENTS of Technical Specification 3/4.7.2 will ensure that sufficient cooling capacity is available either: (1) to provide normal cooldown of the facility, or (2) to mitigate the effects of accident conditions within acceptable limits.

With the implementation of the CCW heat exchanger performance monitoring program, the limiting UHS temperature can be treated as a variable with an absolute upper limit of 100°F without compromising any margin of safety. Demonstration of actual heat exchanger performance capability supports system operation with postulated canal temperatures greater than 100°F. Therefore, an upper Technical Specification limit of 100°F is conservative.

Justification: This BASES change will provide further clarification on the limitations of the UHS. Pursuant to the requirement of 10 CFR §50.59, the requested change does not have an adverse effect on plant safety, security or operation, does not constitute an unreviewed safety question, and does not require changes to the Technical Specifications other than an administrative change to the BASES Section. Therefore, in accordance with the requirements of 10 CFR §50.59, prior NRC approval for implementation is not required.

10. TS 6.8.2 - Procedures and Programs

Recommendation: Delete the reference to "Specification 6.8.1 (a through f), and changes thereto," and change it to refer to "Specification 6.8.1 above, and changes thereto, except the Quality Control Program for environmental monitoring."

Justification: To maintain present and future consistency with 6.8.1 as changes to it are made, restructuring the wording will eliminate the need for further revisions.

11. TS 6.8.3 - Procedures and Programs

Recommendation: Delete the reference to "Specification 6.8.1 (a through g), and changes thereto," and change it to refer to "Specification 6.8.1 above".



Justification: To maintain present and future consistency with 6.8.1 as changes to it are made, restructuring the wording will eliminate the need for further revisions.

Summary

The proposed revisions to Turkey Point Units 3 and 4 Technical Specifications are administrative in nature. These requested changes do not have an adverse effect on plant safety, security or operation, do not constitute an unreviewed safety question, and do not require changes to the Technical Specifications other than administrative changes. These proposed changes do not constitute changes to the plant or to procedures as described in the FSAR, nor do they change any test or experiment as described in the FSAR. FPL proposes to revise the Turkey Point Units 3 and 4 TS to achieve consistency throughout the TS by (a) removing outdated material, (b) incorporating administrative clarifications, and (c) correcting typographical errors by changing the selected Technical Specifications mentioned above.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

The proposed license amendments involve administrative changes to existing requirements of Turkey Point Units 3 and 4 Technical Specifications (TS). These changes do not affect plant design or the modes of plant operation. The following proposed changes are requested:

1. TS BASES 3/4.1.3 - Movable Control Assemblies
Recommendation: Change the maximum step count reached from 231 to 230 on the step counter.
2. TS 4.2.2.2.c.1 - MIDS
Recommendation: Correct symbol for standard deviation from " j" to " σ_j ".
3. TS 4.3.1.1 - Reactor Trip System Instrumentation
Recommendation: Capitalize 'Reactor' where it is stated "Each reactor Trip System..."
4. TS Table 3.3-1 - Reactor Trip System Instrumentation
Recommendation: Convert Item 18.B to Item 18.b. Delete one of the 'per' words in ACTION 2.b.
5. TS 3.9.4 - Containment Building Penetrations
Recommendation: Change 3.9.4.b.2) from "at least 23 feet of water above the fuel..." to "at least 23 feet of water above the reactor vessel flange ..."
6. TS 3.12.1.c - Monitoring Program
Recommendation: Change reference to 'Semiannual Radioactive Effluent Release Report' to 'Annual Radioactive Effluent Release Report'.
7. TS 3.12.2.b - Land Use Census
Recommendation: Change reference to 'Semiannual Radioactive Effluent Release Report' to 'Annual Radioactive Effluent Release Report'.

8. TS BASES 3/4.2.4 - Quadrant Power Tilt Ratio

Recommendation: Delete one of the words, 'action', in the third paragraph.

9. TS BASES 3/4.7.4 - Ultimate Heat Sink

Recommendation: Change the BASES for the Ultimate Heat Sink (UHS) to read as follows:

The limit on ultimate heat sink temperature in conjunction with the SURVEILLANCE REQUIREMENTS of Technical Specification 3/4.7.2 will ensure that sufficient cooling capacity is available either: (1) to provide normal cooldown of the facility, or (2) to mitigate the effects of accident conditions within acceptable limits.

With the implementation of the CCW heat exchanger performance monitoring program, the limiting UHS temperature can be treated as a variable with an absolute upper limit of 100°F without compromising any margin of safety. Demonstration of actual heat exchanger performance capability supports system operation with postulated canal temperatures greater than 100°F. Therefore, an upper Technical Specification limit of 100°F is conservative.

10. TS 6.8.2 - Procedures and Programs

Recommendation: Delete the reference to "Specification 6.8.1 (a through f), and changes thereto," and change it to refer to "Specification 6.8.1 above, and changes thereto, except the Quality Control Program for environmental monitoring,"

11. TS 6.8.3 - Procedures and Programs

Recommendation: Delete the reference to "Specification 6.8.1 (a through g), and changes thereto," and change it to refer to "Specification 6.8.1 above".

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 amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed amendments are purely administrative in nature. These amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed changes do not affect the probability or consequences of accidents 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 use of the modified specifications can not create the possibility of a new or different kind of accident from any previously evaluated since the proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. No new failure mode is introduced due to the administrative changes and clarifications, since the proposed changes do not involve the addition or modification of equipment nor do they alter the design or operation of affected plant systems, structures, or components.

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

The operating limits and functional capabilities of the affected systems, structures, and components are unchanged by the proposed amendments. The modified specifications which correct administrative errors and clarify existing Technical Specification requirements do not significantly reduce any of the margins 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.

L-95-192
Attachment 3

ATTACHMENT 3

**PROPOSED LICENSE AMENDMENT FOR
ADMINISTRATIVE UPDATE - 1995**

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