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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

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RECIPIENT AFFILIATION

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SUBJECT: Application for amends to licenses DPR-31 & DPR-41,mofifying  
TS per selected line items from NRC GL 93-05, "Line-Item  
TS Improvements to Reduce SR for Testing During Power  
Operation."

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JUL 26 1995

L-95-169  
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 & 4  
Docket Nos. 50-250 and 50-251  
Proposed License Amendments  
NRC Generic Letter 93-05 Items 4.2, 5.4, 5.14, 6.1, and 12:  
Technical Specification Line-Item Improvements.

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 in accordance with selected line items from NRC Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation".

A description of the amendments request is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR \$50.92. 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.

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

CDV

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

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STATE OF FLORIDA           )  
                                  ) ss.  
COUNTY OF DADE           )

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

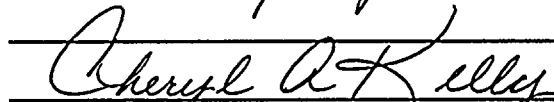
That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

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

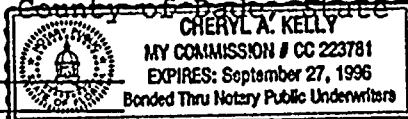
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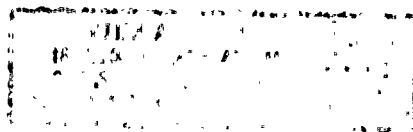
  
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Name of Notary Public (Type or Print)

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

Changes are proposed to revise Turkey Point Units 3 and 4 Technical Specifications (TS) Sections 4.1.3.1.2, 4.6.5.1, 4.4.6.2.2, 4.10.1.2, and Table 4.3-3 to reduce the frequency of testing. These changes are consistent with the recommendations of NRC Generic letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and NUREG 1366, "Improvements to Technical Specifications Surveillance Requirements," Items 4.2, 5.4, 5.14, 6.1, and 12.

The proposed amendments will improve safety, reduce equipment degradation, and ease the burden on personnel resources by reducing the frequency of specified testing per GL 93-05.

#### Background

The staff of the Nuclear Regulatory Commission (NRC) has completed a comprehensive examination of surveillance requirements in Technical Specifications that require testing during power operation. This effort was part of the Technical Specification Improvement Program (TSIP). The results of this work were presented in NUREG 1366. NUREG 1366 provided recommendations based on NRC findings. GL 93-05 was subsequently issued to provide guidance to licensees who plan to adopt applicable recommendations (line-item improvements).

The title and number of the following proposed line-item improvements correspond to the section title and number in NUREG 1366 and Enclosure 1 to GL 93-05. The proposed changes are compatible with plant operating experience and are consistent with the guidance provided by the NRC.

#### Discussion and Description of Proposed Changes

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

1. GL 93-05 Section 4.2.1 - Control Rod Movement Test

GL 93-05 Recommendation: "Change frequency of the PWR control rod movement test to quarterly."

Technical Specification Surveillance Requirements (SR) 4.1.3.1.2 - The current rod control surveillance requires a movement test of all rods not fully inserted "at least once per 31 days". The recommended change would move the specified frequency to "at least once per 92 days".

Justification: This change does not affect the operability of the system, only the specified surveillance frequency. Industry experience has shown that this test can result in reactor trips, dropped rods, and unnecessary challenges to the safety systems. The proposed change to the surveillance interval will reduce the likelihood of these occurrences.

This proposed Technical Specification change is consistent with Turkey Point Units 3 and 4 design and operational experience, as well as being consistent with the guidance provided in NUREG-1366.

2. GL 93-05 Section 5.4 - Hydrogen Monitor Surveillance

GL 93-05 Recommendation: "Change frequency of the calibration to once each refueling interval and analog channel operational test to quarterly."

Technical Specification SR 4.6.5.1 - The current TS for hydrogen monitor surveillance requires a calibration once quarterly and an analog channel operational test monthly. The recommended change would extend the specified frequency to each refueling interval for the calibration and the analog channel operational test to quarterly.

Justification: This change does not affect the operability of the system, only the specified surveillance frequency. Since hydrogen monitors serve only an indicating function and are only required after an accident in which the core is damaged, and the calibration is a time-consuming evolution which requires opening containment isolation valves for a system with sensors inside the containment, the NRC Staff recommended that the calibration interval be extended to each refueling interval and the analog channel operational test be extended to quarterly.

This proposed Technical Specification change is consistent with Turkey Point Units 3 and 4 design and operational experience, as well as being consistent with the guidance provided in NUREG-1366.

3. GL 93-05 Section 5.14 - Radiation Monitors

GL 93-05 Recommendation: "In order to decrease licensee burden and increase the availability of radiation monitors, change the monthly channel functional test to quarterly."

Technical Specification SR Table 4.3-3 - The current TS for radiation monitor surveillance requires an analog channel operational test monthly. The recommended change would extend the specified frequency to quarterly. The word 'Radioactivity' is spelled incorrectly in Item 1.a.

Justification: This change does not affect the operability of the system, only the specified surveillance frequency. Industry



experience has shown that testing of radiation monitor instruments can produce a significant number of inadvertent isolations of the control room and various process lines. In addition, the testing requires significant personnel resources and the frequent testing tends to degrade the equipment, as seen in other facilities. The proposed change to the surveillance interval will reduce the likelihood of these occurrences and a reduction in licensee burden. The word 'Radioactivity' will be corrected in Item 1.a. as a purely administrative correction.

This proposed Technical Specification change is consistent with Turkey Point Units 3 and 4 design and operational experience, as well as being consistent with the guidance provided in NUREG-1366.

4. GL 93-05 Section 6.1 - Reactor Coolant System Isolation Valves

GL 93-05 Recommendation: "Increase the 72-hour time for remaining in cold shutdown without leak testing the Reactor Coolant System (RCS) isolation valves to 7 days."

Technical Specification SR 4.4.6.2.2 - The current reactor coolant system (RCS) pressure isolation valve surveillance requires a leak test of RCS pressure isolation valves when the unit has been in COLD SHUTDOWN more than 72 hours and the valves have not been leak-tested within the previous 9 months. The recommended change requires the RCS pressure isolation valve leak test surveillance only if the unit is in COLD SHUTDOWN 7 days or more and if leakage testing has not been performed in the previous 9 months.

Justification: As described in NUREG-1366, the NRC staff recommended that the 72-hour time for remaining shutdown without testing the RCS pressure isolation valves for leaks be increased to 7 days to help utilities perform short notice outage repairs under less stress, without a significant change in the associated risk.

This proposed Technical Specification change is consistent with Turkey Point Units 3 and 4 design and operational experience, as well as being consistent with the guidance provided in NUREG-1366.

5. GL 93-05 Section 12 - Suspending Shutdown Margin Requirements

GL 93-05 Recommendation: "All PWR licenses may select the Florida Power and Light Co. (FPL) proposal to eliminate one rod drop test if they satisfy the condition of performing a rod drop test no more than 7 days before reducing shutdown margin. If a rod drop test has been performed within this time, another test is not necessary."

Technical Specification SR 4.10.1.2 - The current TS utilizes a 24 hour time period prior to reducing the SHUTDOWN MARGIN less

than Technical Specification 3.1.1.1. The recommended change to the testing requirement would redefine this interval as 7 days vice 24 hours prior to reducing the SHUTDOWN MARGIN.

Justification: The rod drop time test is performed in order to verify that control rod drop times are less than the value(s) assumed in the safety analyses, and also verifies that the rods are capable of being fully inserted into the core. This test also meets the requirements of Technical Specification 4.10.1.2. Utilizing the 24 hour limit may result in testing control rods at least twice following a refueling outage: once for the rod drop time measurements and once prior to the time that the SHUTDOWN MARGIN is suspended. Since no changes will have been made to the core geometry between the time that the control rods are tripped for the rod drop time measurement and the suspension of the SHUTDOWN MARGIN, only one test is needed to satisfy the requirement if the rod drop time test has been performed no more than 7 days before reducing the SHUTDOWN MARGIN.

This proposed Technical Specification change is consistent with Turkey Point Units 3 and 4 design and operational experience, as well as being consistent with the guidance provided in NUREG-1366.

#### Summary

The proposed revisions to Turkey Point Units 3 and 4 Technical Specifications Surveillance Requirements 4.1.3.1.2, 4.4.6.2.2, 4.6.5.1, 4.10.1.2, and Table 4.3-3 will reduce the frequency of testing. These changes are consistent with the recommendations of GL 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and NUREG 1366, "Improvements to Technical Specifications Surveillance Requirements," Items 4.2, 5.4, 5.14, 6.1, and 12. These changes will improve safety, reduce equipment degradation, and ease the burden on personnel resources.

From a safety aspect, this testing is important to periodically verify that systems, structures, and components are available to perform their safety functions. However, even though testing at power is important, equipment degradation can be decreased, challenges to safety systems reduced, occupational exposure limited, and unnecessary burdens on personnel resources eliminated by reducing the amount of testing that the Technical Specifications require during power operation. The proposed changes from GL 93-05 and NUREG-1366 requested by Turkey Point will result in a net benefit to the safe operation of the facility.

## ATTACHMENT 2

### NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

#### Description of Proposed License Amendments

The proposed license amendments involve changes to existing surveillance requirements (SR) of Turkey Point Units 3 and 4 Technical Specifications (TS). These changes are consistent with guidance provided by NUREG-1366 and NRC Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation". These changes do not affect plant design or the modes of plant operation. The reduction in surveillance testing during power operation will improve safety, reduce equipment degradation, and ease the burden on personnel resources. The following proposed changes are requested:

- (1) TS SR 4.1.3.1.2: Change the frequency interval for control rod movement test from monthly to quarterly.
- (2) TS SR 4.6.5.1: Change the hydrogen monitor calibration from quarterly to each refueling interval, and the analog channel operational test from monthly to quarterly.
- (3) TS SR Table 4.3-3: Change the analog channel functional test from monthly to quarterly for radiation monitors. Correct spelling of 'Radioactivity' in Item 1.a.
- (4) TS SR 4.4.6.2.2: Increase the time allowed in COLD SHUTDOWN before leak testing the Reactor Coolant System (RCS) isolation valves is required, from 72 hours to 7 days.
- (5) TS SR 4.10.1.2: Changes the requirement for a rod drop test prior to reducing SHUTDOWN MARGIN from "within 24 hours" to "within 7 days".

#### 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 conform to the guidance given in Enclosure 1 of the NRC Generic Letter 93-05. The overall functional capabilities of the rod control system, RCS pressure isolation valves, the hydrogen monitoring system, and the radiation monitoring systems will not be modified by the proposed change. These amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons:

- (1) Increasing the interval of control rod movement testing will reduce the possibility of testing-related reactor trips and dropped rods, and result in fewer challenges to safety systems and plant transients.
  - (2) Increasing the interval of hydrogen monitor calibration and operational tests will result in a reduction in equipment degradation and reduce a burdensome task on personnel resources.
  - (3) Increasing the interval of radiation monitor functional tests will result in less equipment degradation as well as reducing the potential for testing-related isolations of the control room, fuel handling building, auxiliary buildings, and various process lines.
  - (4) Increasing the time allowed in COLD SHUTDOWN prior to leak testing RCS isolation valves will permit plant personnel to focus on short notice outage recovery and minimize personnel radiation exposure. Since the methods and the acceptance criteria used for the leak test are not altered, increasing the time from 72 hours to 7 days will not significantly alter the associated risk.
  - (5) Increasing the time required to perform rod tests prior to reducing the SHUTDOWN MARGIN will result in only one rod drop test vice two following a refueling outage, which will in turn reduce plant transients and personnel resource requirements.
- (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 proposed changes to the TS can not create the possibility of a new or different kind of accident from any accident 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 surveillance interval 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.

- (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 are unchanged by the proposed amendments. The proposed changes to the TS which establish new or clarify old surveillance intervals consistent with the NRC Generic Letter 93-05 line-item improvement guidance do not significantly reduce any of the margins of safety even though the number of surveillances is decreased. These requested amendments are justified by the following reasoning from NUREG-1366:

- (1) The surveillances could lead to plant transients which would challenge safety systems unnecessarily as in the cases of control rod movement tests and post-refueling rod drop tests.
- (2) The surveillances result in the unnecessary wear to equipment as in the cases of the hydrogen and radiation monitor surveillances.
- (3) The surveillance result in radiation exposure to plant personnel which is not justified by the safety significance of the surveillances as in the case of the time requirement for leak-testing RCS isolation valves when in COLD SHUTDOWN.
- (4) The surveillances place an unnecessary burden on plant personnel because the time required is not justified by the safety significance of the surveillance, i.e. hydrogen monitor and post-refueling rod drop tests.

#### 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; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR §50.92.

L-95-169  
Attachment 3

**ATTACHMENT 3**

**PROPOSED LICENSE AMENDMENT FOR  
IMPLEMENTATION OF LINE-ITEM TECHNICAL SPECIFICATION IMPROVEMENTS**

**PROPOSED TECHNICAL SPECIFICATIONS PAGES**

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3/4 6-19

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