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RECIP.NAME RECIPIENT AFFILIATION

Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, modifying
TS in accordance w/Line-Item 10.1 from GL 93-05, "Line-Item
TS Improvements to Reduce Surveillance Requirements for
Testing During Power Operation" & guidance in GL 94-01.

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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
Emergency Diesel Generators; Change to Testing Requirements per
Generic Letters 93-05 and 94-01

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 and 4 Technical Specifications in accordance with Line-Item 10.1 from NRC Generic Letter (GL) 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation", and guidance provided in GL 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators." This proposal also contains FPL's commitment to implement a maintenance program for monitoring and maintaining diesel generator performance for both Turkey Point units consistent with 10 CFR \$50.65 and the guidance of Regulatory Guide (RG) 1.160.

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.

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

Attachments

cc: S. D. Ebner, 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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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;

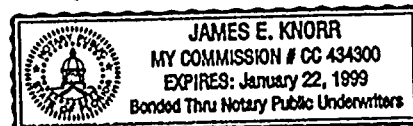
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

T. F. Plunkett
T. F. Plunkett

Subscribed and sworn to before me this

11th day of September, 1995.

James E. Knorr
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 Jan. 22, 1999
Commission No. CC 434300

T. F. Plunkett is personally known to me.

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Units 3 and 4 be revised to incorporate line-item Technical Specification (TS) improvements to Specifications 3/4.8.1, "Electrical Power Systems-A.C. Sources", and the associated BASES. The proposed changes are consistent with guidance provided in NRC Generic Letter (GL) 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and the corresponding recommendations contained in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements."

In addition, line-item improvements are proposed following the guidance in GL 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators." A commitment is made to implement a maintenance program for monitoring and maintaining Emergency Diesel Generator (EDG) performance for Turkey Point's EDGs consistent with the provisions of 10 CFR §50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and the associated guidance of Regulatory Guide (RG) 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," within 90 days following issuance of the proposed amendments.

Furthermore, FPL requests to revise the current wording used in the Turkey Point Units 3 and 4 TS to require testing of remaining required diesel generators "[i]f the diesel generator became inoperable due to any cause other than planned preventative maintenance...". FPL requests that TS 3.8.1.1, ACTION statements b. and c. be amended such that the word 'preventative' is deleted. Deleting this wording will reduce unnecessary testing of diesel generators as a result of planned corrective maintenance.

Background

Generic Letter 93-05: As part of the NRC Technical Specifications Improvement Program, the NRC, in NUREG-1366, reported the findings and recommendations of a comprehensive examination of surveillance requirements in TS that require testing during power operation. Certain recommendations from this study were intended to remove testing requirements which may be counter-productive to safety in terms of equipment degradation and availability, and were incorporated into the improved Standard Technical Specifications (STS) issued by the NRC in September 1992. For plants that have TS in a format that is different than the STS, GL 93-05 provides guidance to assist licensees in preparing license amendment requests to implement recommendations contained in NUREG-1366 as line-item TS improvements. Proposed TS changes should be consistent with the intent of the NUREG



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recommendations, the guidance of GL 93-05, and the format of the individual plant TS.

Line-Item 10.1 of NUREG-1366 and GL 93-05 include the recommended improvements to the TS for the EDGs. Specifically,

- (1) When an EDG itself is inoperable (not including a support system or independently testable component), the other EDG(s) should be tested only once (not every 8 hours) and within 8 hours unless the absence of any potential common-mode failure can be demonstrated.
- (2) EDGs should be loaded in accordance with the vendor recommendations for all test purposes other than the refueling outage Loss-of-Offsite Power (LOOP) tests.

Note: Turkey Point has already implemented this line-item under a separate submittal.

- (3) The hot-start test following the 24-hour EDG test should be a simple EDG start test. If the hot-start test is not performed within the required 5 minutes following the 24-hour EDG test, it should not be necessary to repeat the 24-hour EDG test. 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.

Note: Turkey Point has already implemented this line-item under a separate submittal.

- (4) Delete the requirement for alternative testing that requires testing of EDGs and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG).

Generic Letter 94-01: GL 94-01 provides guidance for a TS line-item improvement that was developed in response to an NRC decision in SECY-93-044, "Resolution of Generic Safety Issue B-56, 'Diesel Generator Reliability'." The GL states that, "The NRC staff finds that a commitment to implement a maintenance program for monitoring and maintaining EDG performance in accordance with the provisions of the maintenance rule and consistent with the guidance of RG 1.160 would provide a basis for the staff to approve a licensee request to remove the accelerated testing and special reporting requirements for EDGs from their plant TS." Specifically, accelerated testing requirements for EDGs, which are based on the number of failures in the last 20 and 100 valid tests, would be deleted, and reference to the applicable test schedule would be deleted from TS 4.8.1.1.2. In addition, EDG Special Reporting requirements would be deleted from the plant TS since 10 CFR §50.72 and §50.73 address other regulatory requirements for licensees to notify NRC and report individual EDG failures.

Preventive Maintenance: To eliminate additional unnecessary testing and delays, FPL requests to amend the requirements of TS 3.8.1.1 ACTION statements b. and c. to delete the word 'preventative' from "planned preventative maintenance". The NRC in a Safety Evaluation for Amendment 54 for Nine Mile Point 2 (Docket# 50-410), dated December 15, 1993, defines "corrective maintenance" as "work that is not required to be performed to maintain EDG operability. Accordingly, the condition requiring corrective maintenance has not prevented the EDG from performing its intended function." The corollary definition of "preventive maintenance" would be "maintenance performed without any indications of degraded performance or function." Based on the above definition of "corrective maintenance," FPL has concluded that an amendment deleting the word "preventive" (in the case of the Turkey Point TS, "preventative") is justified.

Discussion and Description of Proposed Changes

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

1. TS 3.8.1.1, ACTION a. "With one of two startup transformers or an associated circuit inoperable,..." : **DELETE** the following requirement to test EDGs: "If any of the required diesel generators have not been successfully tested within the past 24 hours, demonstrate their OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 for each such diesel generator, separately, within 24 hours, unless the diesel generator is already operating."

BASIS: NUREG-1366 and GL 93-05, Line-Item 10.1, Recommendation (4). Delete the requirement for alternate testing of EDGs and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG). Testing of EDGs is not necessary to prove operability if the startup transformers or associated circuits are inoperable since these systems and components do not affect EDG operability.

2. TS 3.8.1.1 ACTION b. "With one of the required diesel generators inoperable,..." : **REVISE** the following requirement to test the remaining OPERABLE EDGs, "If the diesel generator became inoperable due to any cause other than preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours*;" **TO READ,**

If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or planned maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined. If testing of remaining required diesel generators is required, this testing must be performed

regardless of when the inoperable diesel generator is restored to OPERABILITY.

BASIS: NUREG-1366 and GL 93-05, Line-Item 10.1, Recommendation (1). FPL's proposed wording has the same meaning as the generic example for this specification provided in GL 93-05, and is consistent with the syntax used in the BASES shown in the improved Standard TS (STS) for Westinghouse Plants (NUREG-1431). The '24 hour' requirement differs from the '8 hour' requirement of NUREG-1366 and GL 93-05, but is consistent with GL 84-15 guidance, current Turkey Point TS requirements, and NUREG-1431 requirements. The word 'preventative' is deleted to prevent unnecessary testing and delays associated with planned corrective maintenance. If, in the course of performing planned maintenance, a potential common mode problem is detected, an evaluation of the operability of the remaining diesel generators will be performed, or the required surveillance testing will be completed. The second sentence incorporates current footnote "*" into ACTION statement b.

3. Page 3/4 8-2, Footnote "*" : DELETE the footnote, "Unless the diesel generator inoperability was due to preplanned preventative maintenance, or testing, this test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY."

BASIS: The footnote, edited as described above, is deleted and incorporated into the ACTION statement.

4. TS 3.8.1.1 ACTION c. "With one startup transformer and one of the required diesel generators inoperable,..." : REVISE the following requirement to test the remaining required diesel generators, "and if the diesel generator became inoperable due to any cause other than preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours*, " TO READ,

and if the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or planned maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators,...

INSERT a new sentence in ACTION c., as indicated by "Insert B" in Attachment 3, TO READ,

If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY.

BASIS: NUREG-1366 and GL 93-05, Line-Item 10.1, Recommendation (1). FPL's proposed wording has the same meaning as the generic example for this TS provided in GL 93-05, and is consistent with the syntax used in the BASES for corresponding Actions B.3.1 and B.3.2 shown in the STS for Westinghouse Plants (NUREG-1431). The word 'preventative' is deleted to prevent unnecessary testing and delays associated with planned corrective maintenance. If, in the course of performing planned maintenance, a potential common mode problem is detected, an evaluation of the operability of the remaining diesel generators will be performed, or the required surveillance testing will be completed. The new sentence incorporates current footnote "*" into ACTION statement c.

5. Page 3/4 8-3, Footnote "*" : DELETE the footnote, "Unless the diesel generator inoperability was due to preplanned preventative maintenance, or testing, this test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY."

BASIS: The footnote, edited as described above, is deleted and incorporated into the appropriate ACTION statement.

6. TS 3.8.1.1. ACTION e. "With two of the above required startup transformers or their associated circuits inoperable,..." : DELETE the following requirement to test the EDGs: "and demonstrate the OPERABILITY of the required diesel generators separately by performing the requirements of Specification 4.8.1.1.2a.4 within 8 hours, unless the diesel generators are already operating, and at least once per 24 hours thereafter"

BASIS: NUREG-1366 and GL 93-05, Line-Item 10.1, Recommendation (4). Delete the requirement for alternate testing of EDGs and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG). Testing of EDGs is not necessary to prove operability if the startup transformers or associated circuits are inoperable since these systems and components do not affect EDG operability.

7. SR 4.8.1.1.2a, REVISE the specified frequency, "In accordance with the frequency specified in Table 4.8-1 with diesel generator surveillances performed nonconcurrently by:" **TO READ,**

At least once per 31 days on a STAGGERED TEST BASIS by:

BASIS: Implementing the provisions of the maintenance rule for EDGs and the associated support systems that impact EDG availability will assure acceptable EDG performance. FPL hereby commits to implement within 90 days following issuance of the license amendments, a maintenance program for monitoring and maintaining EDG performance consistent with the provisions of 10 CFR §50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and the guidance of RG 1.160 for Turkey Point Units 3 and 4.

As stated in GL 94-01, "...the staff has concluded that it is not

necessary to await the effective date of the maintenance rule to remove the associated TS requirements nor is it necessary to relocate accelerated testing requirements to the maintenance program." The proposed TS change is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.2"

8. SR 4.8.1.1.3, Reports: **DELETE** the specified reporting requirement and **REPLACE** with the words "(Not used)"

BASIS: GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.3." 10 CFR §50.72 and §50.73 address the remaining regulatory requirements for licensees to notify NRC and report individual EDG failures. The SR is replaced with the words "(Not used)" to maintain proper pagination within the Turkey Point TS.

9. TABLE 4.8-1: **REPLACE** the content of TABLE 4.8-1 with the words, "(Not used)"

BASIS: GL 94-01, Enclosure 2, "Revisions to Table 4.8.1.1.2-1." The table is replaced with the words "(Not used)" to maintain proper pagination within the Turkey Point TS.

10. SR 4.8.1.2: **DELETE** the reference to SR 4.8.1.1.3 and remove extra parentheses.

BASIS: Since the special reporting requirements of SR 4.8.1.1.3 are removed in accordance with GL 94-01, this reference is no longer required. Only one set of parentheses is required.

11. BASES 3/4 8.1, 3/4 8.2, and 3/4 8.3 A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION: **ADD** the following paragraph as indicated by "Insert E" in Attachment 3:

All diesel generator inoperabilities must be investigated for common-cause failures regardless of how long the diesel generator inoperability persists. When one diesel generator is inoperable, TS 3.8.1.1 ACTION statements b and c provide an allowance to avoid unnecessary testing of other required diesel generators. If it can be determined that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, then SR 4.8.1.1.2a.4 does not have to be performed. Twenty-four (24) hours (or eight (8) hours if both a startup transformer and diesel generator are inoperable) is reasonable to confirm that the remaining required diesel generators are not affected by the same problem as the inoperable diesel generator. If it cannot otherwise be determined that the cause of the initial inoperable diesel generator does not exist on the remaining required diesel generators, then satisfactory performance of SR 4.8.1.1.2a.4 suffices to provide assurance of continued OPERABILITY of the remaining required diesel generators. If the cause of the initial inoperability exists on one or more of the remaining required diesel generators, those diesel generators affected would also be declared inoperable upon discovery, and TS 3.8.1.1 ACTION statement f or TS 3.0.3, as

appropriate, would apply.

BASIS: The proposed additions are consistent with the existing BASES format, and will update the reasons for Specification 3/4.8 accounting for the changes requested in this submittal.

12. BASES 3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION: **DELETE** the paragraph "A footnote is added to ensure the remaining required EDG's are tested for OPERABILITY if one of the required EDG's becomes inoperable due to reasons other than preplanned preventative maintenance. This statement will ensure that tests are performed to verify common mode failures do not exist."

BASIS: The footnote, edited as described above, is deleted and incorporated into the appropriate ACTION statement. The basis for the revised ACTION statement, incorporating the footnote, is discussed in the revised BASES in Item 11., above.

Summary

The proposed changes to the Turkey Point Units 3 and 4 Technical Specifications are consistent with the intent of the NUREG-1366 recommendations involving Emergency Diesel Generator Surveillance Requirements (PWR, BWR), the guidance of GL 93-05, the guidance of GL 94-01, NUREG-1431, and the existing format and content of the Turkey Point TS.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-31 and DPR-41 for Turkey Point Units 3 and 4 be revised to incorporate line-item TS improvements to Specifications 3/4.8.1, "Electrical Power Systems-A.C. Sources", and the associated BASES. The proposed changes are consistent with Technical Specification (TS) change guidance provided by the NRC in GL 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and the corresponding recommendations contained in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements."

In addition, line-item improvements are proposed following the guidance in GL 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators." The implementation of a maintenance program for monitoring and maintaining Emergency Diesel Generator (EDG) performance for Turkey Point Units 3 and 4, consistent with the provisions of 10 CFR §50.65 "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" and the associated guidance of Regulatory Guide (RG) 1.160 will be met by FPL within 90 days following issuance of the proposed amendments.

A description of these changes is discussed below:

1. TS 3.8.1.1, ACTION a. "With one of two startup transformers or an associated circuit inoperable,..." : **DELETE** the following requirement to test EDGs: "If any of the required diesel generators have not been successfully tested within the past 24 hours, demonstrate their OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 for each such diesel generator, separately, within 24 hours, unless the diesel generator is already operating."
2. TS 3.8.1.1 ACTION b. "With one of the required diesel generators inoperable,..." : **REVISE** the following requirement to test the remaining OPERABLE EDGs, "If the diesel generator became inoperable due to any cause other than preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours*;" **TO READ,**

If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or planned maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel

generators is determined. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY.

3. Page 3/4 8-2, Footnote "*" : DELETE the footnote, "Unless the diesel generator inoperability was due to preplanned preventative maintenance, or testing, this test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY."

4. TS 3.8.1.1 ACTION c. "With one startup transformer and one of the required diesel generators inoperable,..." : REVISE the following requirement to test the remaining required diesel generators, "and if the diesel generator became inoperable due to any cause other than preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours*," **TO READ,**

and if the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or planned maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators,...

INSERT a new sentence in ACTION c., as indicated by "Insert B" in Attachment 3, **TO READ,**

If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY.

5. Page 3/4 8-3, Footnote "*" : DELETE the footnote, "Unless the diesel generator inoperability was due to preplanned preventative maintenance, or testing, this test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY."
6. TS 3.8.1.1. ACTION e. "With two of the above required startup transformers or their associated circuits inoperable,..." : DELETE the following requirement to test the EDGs: "and demonstrate the OPERABILITY of the required diesel generators separately by performing the requirements of Specification 4.8.1.1.2a.4 within 8 hours, unless the diesel generators are already operating, and at least once per 24 hours thereafter"
7. SR 4.8.1.1.2a, REVISE the specified frequency, "In accordance with the frequency specified in Table 4.8-1 with diesel generator

surveillances performed nonconcurrently by:" TO READ,

At least once per 31 days on a STAGGERED TEST BASIS by:

8. SR 4.8.1.1.3, Reports: **DELETE** the specified reporting requirement and **REPLACE** with the words "(Not used)"
9. TABLE 4.8-1: **REPLACE** the content of TABLE 4.8-1 with the words, "(Not used)"
10. SR 4.8.1.2: **DELETE** the reference to SR 4.8.1.1.3 and remove extra parentheses.
11. BASES 3/4 8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION: **ADD** the following paragraph as indicated by "Insert E" in Attachment 3:

All diesel generator inoperabilities must be investigated for common-cause failures regardless of how long the diesel generator inoperability persists. When one diesel generator is inoperable, TS 3.8.1.1 ACTION statements b and c provide an allowance to avoid unnecessary testing of other required diesel generators. If it can be determined that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, then SR 4.8.1.1.2a.4 does not have to be performed. Twenty-four (24) hours (or eight (8) hours if both a startup transformer and diesel generator are inoperable) is reasonable to confirm that the remaining required diesel generators are not affected by the same problem as the inoperable diesel generator. If it cannot otherwise be determined that the cause of the initial inoperable diesel generator does not exist on the remaining required diesel generators, then satisfactory performance of SR 4.8.1.1.2a.4 suffices to provide assurance of continued OPERABILITY of the remaining required diesel generators. If the cause of the initial inoperability exists on one or more of the remaining required diesel generators, those diesel generators affected would also be declared inoperable upon discovery, and TS 3.8.1.1 ACTION statement f or TS 3.0.3, as appropriate, would apply.

12. BASES 3/4 8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION: **DELETE** the paragraph "A footnote is added to ensure the remaining required EDG's are tested for OPERABILITY if one of the required EDG's becomes inoperable due to reasons other than preplanned preventative maintenance. This statement will ensure that tests are performed to verify common mode failures do not exist."

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 license amendments proposed for Turkey Point Units 3 and 4 will incorporate line-item Technical Specification (TS) improvements for Emergency Diesel Generators (EDG) pursuant to guidance provided in Generic Letters (GL) 93-05 and 94-01. The EDGs are not accident initiators, the proposed TS changes do not involve any assumptions relative to accident initiators in the plant safety analyses, and therefore the proposed amendments will not impact the probability of occurrence for accidents previously analyzed.

The EDG line-item TS improvements associated with GL 93-05 are based on recommendations designed to remove unwarranted requirements for testing during power operation and other factors that are counter-productive to safety in terms of equipment degradation and availability. These recommendations resulted from a comprehensive study of industry-wide EDG surveillance requirements and subsequent findings reported by the NRC in NUREG-1366. The proposed amendments are consistent with the guidance of GL 93-05 for implementing such recommendations as well as contemporary licensing actions by the NRC on other light water reactors.

Similarly, GL 94-01 provides guidance for a line-item TS improvement that will remove accelerated testing requirements from the TS provided that the licensee commits to a maintenance program for monitoring and maintaining EDG performance that includes the applicable provisions of the maintenance rule (10 CFR §50.65). Such a program will further assure EDG availability. Since the availability of EDGs is assumed in certain success paths for mitigating analyzed accidents, an improvement in EDG availability will enhance accident mitigation capabilities.

Therefore, 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.

- (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 amendments incorporate line-item TS and other improvements to EDG surveillance testing requirements, and will not change the physical plant or the modes of plant operation defined in the Facility License. The changes do not involve the addition or modification of equipment, nor do they alter the design or methods of operation of plant systems. Plant configurations that are prohibited by TS will not be created by the amendments. Therefore, operation of the facility in accordance with the proposed amendment 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 amendments are designed to improve EDG availability by eliminating unwarranted surveillance testing. The currently specified surveillance intervals are not changed, except to delete the requirement for accelerated testing under certain circumstances. The proposed changes do not otherwise alter the basis for any Technical Specification that is related to the establishment of, or the maintenance of a nuclear safety margin. Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Summary

Based on the above discussion, 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, 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.

