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SUBJECT: Application for amend to license DPR-31 & DPR-41, modifying
plant TS Tables 3.3-1 & 3.3-2 action statements for RPS/NIS/
ESFAS, Tables 4.3-1 & 4.3-2 SR for RPS/NIS/ESFAS & Bases
3/4.3.1 & 3/4.3.2 for RPS/NIS/ESFAS instrumentations. O
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OCT 04 1995

L-95-248
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
Surveillance Interval Extensions for Reactor Protection System
(RPS), Engineered Safety Features Actuation System (ESFAS), and
Nuclear Instrumentation System (NIS)

By letter L-95-181 dated July 26, 1995, Florida Power and Light Company (FPL) requested 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 (TS) Tables 3.3-1 and 3.3-2 ACTION statements for RPS/NIS/ESFAS Instrumentation, Tables 4.3-1 and 4.3-2 SURVEILLANCE REQUIREMENTS for RPS/NIS/ESFAS Instrumentation, and BASES 3/4.3.1 and 3/4.3.2 for RPS/NIS/ESFAS Instrumentation.

As requested during recent conversations with the Staff, attached is FPL's response to the questions developed as a result of the Staff's review.

Should there be any questions on this submittal, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Plant

OIH

Attachment

cc: S. D. Ebner, 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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ATTACHMENT 1 TO L-95-248

RESPONSE TO QUESTIONS ON PROPOSED LICENSE AMENDMENTS
SURVEILLANCE INTERVAL EXTENSIONS FOR REACTOR PROTECTION SYSTEM,
ENGINEERED SAFETY FEATURES ACTUATION SYSTEM, AND NUCLEAR
INSTRUMENTATION SYSTEM

NRC QUESTION 1:

Do the digital signals feed into a solid state protection system? If so, should the bypass time allowed for ESFAS action 14 be 4 hours vs 8 hours? See 1989 SER page A-14 *.

FPL RESPONSE:

Turkey Point does not utilize a solid state protection system for RPS/ESFAS. Although certain input signals are from digital equipment (i.e., Eagle 21), all RPS/ESFAS logic and actuation signals utilize conventional relays. Therefore, an 8 hour bypass time is appropriate for ESFAS ACTION 14.

NRC QUESTION 2:

Submittal states that digital equipment is used (Eagle 21) for OPDT, OTDT and Pressurizer water level. The digital system and the NI System have bypass capability. RPS and ESFAS Hagan analog equipment do not have bypass capability. The submittal does not state if Steam Line isolation and Feedwater isolation have a bypass capability nor does it specify if they are digital or analog, yet an 8 hour bypass is specified by actions 20 and 22. This is not applicable if there is no bypass and should be 4 hours if it is a solid state system.

FPL RESPONSE

Both the Steam Line isolation and Feedwater isolation instrumentation utilize Hagan analog equipment (i.e., comparators), which do not have bypass capability, therefore, there is no bypass time specified in the applicable ACTION statements. Please note that ACTION statements 20 and 22 are associated with the automatic actuation logic and actuation relays pertaining to Steam Line Isolation and Feedwater Isolation which are part of ESFAS. At Turkey Point, the ESFAS automatic actuation logic and actuation relays have bypass capability, therefore, (as in question 1), an 8 hour bypass time is appropriate for ACTION statements 20 and 22.

NRC QUESTION 3:

Confirm the applicability of WCAP 10271 Supplement 2, Revision 1. The submittal only states WCAP 10271, Supplement 2. See cover letter 2/22/89 SER item 1 and 4/30/90 SSER cover letter items.

FPL RESPONSE:

WCAP 10271 Supplement 2, Revision 1, is the correct reference.
"Revision 1" was inadvertently omitted.

NRC QUESTION 4:

Provide justification for extension of the surveillance interval for items 17a, b, c and d of the RTS table from monthly to refueling. Confirm that the setpoint drift extension from 7 days to 31 days for Note (1) of the RTS surveillance table is properly accounted for in the licensees setpoint calculation methodology.

FPL RESPONSE:

The existing Turkey Point Technical Specifications do not require an analog channel operational test (at MODE 1) for Functional Unit, Item 17.a, Intermediate Range Neutron Flux interlock P-6. In addition, for the following functions, the monthly analog channel operational test (at MODES 1 and/or 2) consists of verifying that the interlock is in the required state by observing the permissive annunciator window:

- 1) Functional Unit, Item 17.b, Low Power Reactor Trip Block Interlock P-7 (includes P-10 input and Turbine First Stage Pressure).
- 2) Functional Unit, Item 17.c, Power Range Neutron Flux Interlock P-8.
- 3) Functional Unit, Item 17.d, Power Range Neutron Flux Interlock P-10.

The NRC's SER for RPS, as supplemented by the discussion contained in the NRC's letter to the Westinghouse Owner's Group (WOG) dated July 24, 1985, recognized the need to consider the special surveillance requirements for those channels which are only operational during transitional modes of operation. The NRC concluded that since a valid operational test can not be performed on the following channels at power, the appropriate test frequency requirement is on a refueling basis, during start-up:

- 1) Power Range, Neutron Flux (Low Setpoint)
- 2) Intermediate Range, Neutron Flux
- 3) Source Range, Neutron Flux

The surveillance requirement change to "refueling" was incorporated into Revision 1 of the "WOG Guidelines for Preparing Submittals Requesting Revision of the RPS Technical Specifications, (which is included in WCAP-10271, Revision 0). The generic analyses provided in the Westinghouse topical reports WCAP-10271 dated May 1986, and WCAP-10271, Supplement 2, Revision 1, dated May 1989, in addition to FPL's confirmation of the applicability of the generic analyses, provide the basis for the above changes.



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The setpoint drift extension is conservatively accounted for in the setpoint calculation methodology. The original Westinghouse setpoint calculation methodology assumed a conservative value for drift (one month duration). The expected NIS drift, based on as-found versus as-left surveillance data, was determined for a drift duration of 3 months (bounding condition). The expected NIS drift was verified to be enveloped by the drift assumed in the current Westinghouse methodology.

Please note that "Note 9" was inadvertently deleted for Functional Unit, Item 4 - Source Range, Neutron Flux. The revised marked-up Technical Specification page 3/4 3-8 is enclosed.

NRC QUESTION 5:

The 1990 SER, page 3, approved certain changes that are being requested in the submittal. Why was the 1990 SER not referenced? The conditions of the 1990 SER have not been met.

FPL RESPONSE:

Although the 1990 SER was not referenced in the submittal, the technical conditions imposed by the Supplemental Safety Evaluation Report have been addressed in the submittal. The enclosed revised Insert A for proposed Technical Specification BASES page B 3/4 3-1 adds the 1990 SER to the list of applicable NRC SERs. FPL confirms the applicability of the generic analyses of WCAP-10271, Supplement 2, Revision 1, to Turkey Point Units 3 and 4.

FPL confirms that any increase in instrument drift due to the extended surveillance test intervals is properly accounted for in the setpoint calculation methodology as discussed in Attachment 1 to L-95-181, Section 3, "Compliance with NRC Imposed Technical Conditions," Item 5.