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

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 HOVEY, R.J.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Application for amends to Licenses DPR-31 & DPR-41, revising  
 TS index to delete bases re administrative controls &  
 reviews.

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**FPL**

**NOV 22 1995**

L-95-216  
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  
Removal of Technical Specifications BASES  
from Technical Specifications Index

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 (TS). The purpose of these amendments is to revise the TS Index to delete reference to the BASES since, in accordance with 10 CFR \$50.36(a), the BASES are not a part of the TS required by 10 CFR \$50.36. Changes to the TS BASES will be made under administrative controls and reviews.

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 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,

Robert J. Hovey  
Vice President  
Turkey Point Plant

EJW/RJT

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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an FPL Group company

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STATE OF FLORIDA            )  
                                  ) ss.  
COUNTY OF DADE            )

Robert J. Hovey 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.

*[Handwritten Signature]*

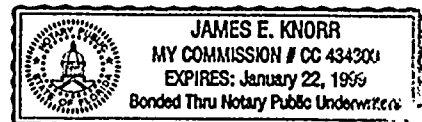
Robert J. Hovey

Subscribed and sworn to before me this

22<sup>nd</sup> day of November, 1995.

*[Handwritten Signature]*  
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

Robert J. Hovey is personally known to me.

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**ATTACHMENT 1**

**DESCRIPTION OF AMENDMENTS REQUEST**

**Description and Purpose**

The proposed amendments revise the Turkey Point Units 3 and 4 Technical Specifications (TS) to remove the reference to the TS BASES from the TS Index since, in accordance with 10 CFR \$50.36(a), the BASES are not a part of the TS required by 10 CFR \$50.36. Changes to the TS BASES will be made under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR \$50.59.

**Background**

Title 10 CFR \$50.36, "Technical Specifications," addresses the categories of technical specifications to be included in each facility's operating license. Title 10 CFR \$50.36(a) states, "[a] summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications." Pursuant to 10 CFR \$50.36(a), FPL proposes that the Index of the Turkey Point Units 3 and 4 TS be revised to delete reference to the BASES.

**Discussion and Description of Proposed Changes**

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

1. **DELETE** reference to BASES section of Index for Section 2, Safety Limits and Limiting Safety System Settings on Index page iii.
2. **DELETE** Index pages xv through xx that deal with Section 3/4 BASES documentation.

Justification: Title 10 CFR \$50.36(a) states, "[a] summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications." Pursuant to 10 CFR \$50.36(a), FPL proposes that the Index of the Turkey Point Units 3 and 4 TS be revised to delete reference to the BASES. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR \$50.59.

## 10 CFR §50.36 Applicability

On July 17, 1995 (60 FR 36953), the Nuclear Regulatory Commission (NRC) amended its regulations pertaining to TS for nuclear power reactors. The rule codifies criteria for determining the content of TS. Licensees may voluntarily use the criteria as a basis to propose the relocation of existing TS that do not meet any of the criteria from the facility license to licensee-controlled documents. The rule's set of objective criteria for determining which regulatory requirements and operating restrictions should be included in TS are addressed below as related to the proposed amendments.

- (A) *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.*

### Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the Turkey Point Units 3 and 4 TS. The proposed changes will revise the Turkey Point Units 3 and 4 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

- (B) *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.*

### 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 TS. 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 TS, are not affected by these amendments. The amendments will revise the Turkey Point Units 3 and 4 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in

accordance with 10 CFR §50.59. No physical modifications to the facility are required to implement these proposed amendments.

- (C) *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.*

#### 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 amendments will revise the Turkey Point Units 3 and 4 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59. No physical modifications to the facility are required to implement these proposed amendments.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

#### Criterion 4 Analysis

The Turkey Point TS 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 revise the Turkey Point Units 3 and 4 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59. No physical modifications to the facility are required to implement these proposed amendments.

#### Summary

The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. Since, per 10 CFR §50.36(a), the BASES are not a part of the TS required by 10 CFR §50.36, reference to the BASES may be removed from the TS Index. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59.



## **ATTACHMENT 2**

### **NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

#### **Description of Proposed License Amendments**

These amendments propose to revise the Turkey Point Units 3 and 4 Technical Specifications (TS) Index to delete reference to the BASES. These changes do not affect plant design or the modes of plant operation. The proposed revisions to Turkey Point Units 3 and 4 TS are administrative in nature. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59.

#### **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 amendments 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 are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. The Technical Specification BASES, per 10 CFR §50.36(a), are not a part of the Technical Specifications. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59. Therefore, the proposed change does 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 proposed amendments are administrative in nature. The proposed amendments will 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 administrative change, since the proposed change does not involve the addition or modification of equipment nor does it 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 BASES information, per 10 CFR §50.36(a), is not a part of the Technical Specifications. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR §50.59. Therefore, the proposed change does not reduce any margin of safety.

#### Summary

Based on the above discussion, FPL has determined that the proposed amendments do 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.



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