

CATEGORY 1

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ACCESSION NBR: 9603200029 DOC. DATE: 96/03/05 NOTARIZED: YES DOCKET #
 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
 AUTH. NAME: HOVEY, R. J. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41, modifying
 TS Sections 4.4.3.3 & 4.5.2 to reduce frequency of
 surveillances & insps in accordance w/GL 93-05 Items, 6.6 &
 7.5.

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L-96-016
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 6.6 and 7.5:
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,

Robert J. Hovey
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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ADD 11

881101

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.

RJH

Robert J. Hovey

Subscribed and sworn to before me this

5th day of March, 1996.

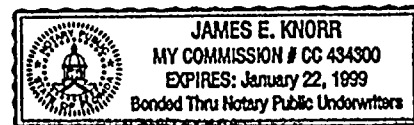
James E. Knorr

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

Changes are proposed to revise Turkey Point Units 3 and 4 Technical Specifications (TS) Sections 4.4.3.3 and 4.5.2 to reduce the frequency of surveillances and inspections. 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 6.6 and 7.5.

The proposed amendments will minimize personnel exposure and ease the burden on personnel resources by reducing the frequency of specified surveillances and inspections 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 6.6 - Pressurizer Heaters (PWR)

GL 93-05 Recommendation: "...For those PWRs which have pressurizer heaters tied to a vital bus, no testing of switching between power supplies should be required."

Technical Specification Surveillance Requirements (SR) 4.4.3.3 - The current pressurizer heater surveillance requires switching between normal and emergency power supplies at least once per 18 months. This requirement will be deleted.

Justification: This change does not affect the operability of the system, only the specified surveillance frequency. The emergency pressurizer heaters are already connected to the emergency bus, therefore no transfer to emergency power is required.

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 7.5 - Visual Inspection of the Containment Sump (PWR)

GL 93-05 Recommendation: "Inspection of the containment at least once daily if the containment has been entered that day, and during the final entry to ensure that there is no loose debris that would clog the sump."

Technical Specification SR 4.5.2.d.2 - The current TS for containment inspection requires an inspection at the completion of each containment entry. This requirement would be modified to state the following:

"At least once daily of the areas affected within containment by containment entry and during the final entry when CONTAINMENT INTEGRITY is established."

Justification: The NRC staff recommends that this inspection should be done at least once daily if the containment has been entered that day and also when the final containment entry is made. This would reduce exposure to people doing work in this area by limiting the time spent in containment.

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 4.4.3.2 and 4.5.2 will reduce the frequency of testing and inspections. 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 6.6 and 7.5. These changes will reduce personnel exposure 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 and inspections

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are important, occupational exposure can be limited and unnecessary burdens on personnel resources can be removed by reducing the amount of testing and inspections that the Technical Specifications require.



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, "Improvements to Technical Specifications Surveillance Requirements," 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 and inspections will minimize personnel exposure and ease the burden on personnel resources. The following proposed changes are requested:

- (1) TS SR 4.4.3.3: Delete the requirement for testing the switching capability for pressurizer heater power supplies on an 18 month interval.
- (2) TS SR 4.5.2.d: Change the containment sump inspection requirements from each containment entry to once daily if a containment entry has been made and upon the final entry prior to establishing CONTAINMENT INTEGRITY.

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 pressurizer heater system and the



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Emergency Core Cooling System (ECCS) will not be modified by the proposed changes. These amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated for the following reasons:

- (1) Deleting the requirement to test the switching capabilities of the pressurizer heater emergency power supplies will reduce an unnecessary testing requirement since the pressurizer heaters are already connected to the emergency bus.
- (2) Increasing the interval of containment sump inspections to once daily if containment has been entered and upon final entry will reduce unnecessary personnel exposure from performance of containment sump inspections for each containment entry.
- (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 changes and inspection requirements, 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 and inspection requirements 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 surveillance or inspection results in radiation exposure to plant personnel which is not justified by the safety significance of the surveillances as in the case of the containment sump inspection requirements.
- (2) The surveillance places an unnecessary burden on plant personnel because the time required is not justified by the safety significance of the surveillance as in the emergency power switching requirements for the pressurizer heater system.

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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.