

CATEGORY 1

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ACCESSION NBR: 9605170254 DOC. DATE: 96/05/13 NOTARIZED: NO 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
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 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC request for addl info re proposed
 license amends relocation of radiological effluent TS, using
 guidance of GL 89-01.

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 TITLE: OR/Licensing Submittal: Appendix I (ODCM)

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FPL

MAY 13 1996

L-96-111
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
Request for Additional Information (RAI) -
Proposed License Amendments
Relocation of Radiological Effluent Technical Specifications
Using the Guidance of Generic Letter 89-01

By letter L-96-18, dated March 21, 1996, Florida Power and Light Company submitted a request to amend Turkey Point Units 3 and 4 Technical Specifications. In your letter of April 18, 1996, the staff requested additional information to support the technical review of the proposed license amendments. The response to these NRC questions is enclosed.

Should there be any questions, please contact us.

Very truly yours,

MIL

R. J. Hovey
Vice President
Turkey Point Plant

Enclosure

JEK

cc: S. D. Ebnetter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point
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Services

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FLORIDA POWER AND LIGHT COMPANY

TURKEY POINT UNITS 3 AND 4

RESPONSE TO NRC QUESTIONS

ON THE

PROPOSED LICENSE AMENDMENTS
RELOCATION OF RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
USING THE GUIDANCE OF GENERIC LETTER 89-01

RESPONSE TO NRC QUESTIONS

In your letter of April 18, 1996, the staff requested additional information to support the technical review of the proposed license amendments. Following is a response to these NRC questions:

Question:

TS Table 4.11-1, page 3/4 11-3, item (1), states "the value of s_b used in the calculation of the LLD for a detection system shall be based on the actual observed variance of the background counting rate or of the counting rate of the blank samples (as appropriate) rather than on an unverified theoretical (sic) predicted variance."

The corresponding ODCM Table 2.2-1, item (1), page 2-16, does not contain this statement.

FPL letter L-96-18 dated March 21, 1996, requested the relocation of the radiological technical specifications. Attachment 1, item 9, states that "the radioactive effluent requirements have been relocated to the ODCM" as justification for deleting Table 4.11-1 from TS. Page 18 of attachment 1 indicates that ODCM Table 2.2-1 contains the requirements of TS Table 4.11-1; however, the ODCM does not contain all the Table 4.11-1 information as indicated above.

What is the justification for not including the above TS Table 4.11-1 statement in the ODCM.

Response:

Florida Power and Light Company acknowledges that the proposed Offsite Dose Calculation Manual (ODCM) Table 2.2-1 does not contain the wording about the definition of s_b . The justification for the removal of the separate statement about the definition is that the separate definition restates the definition in the listing of variables and is therefore redundant. The standard deviation is the specific variance referred to in the additional statement. The discussion of "unverified theoretically predicted variance" is removed since the definition of s_b in the listing of variables does not allow or intend to allow the use of any unverified theoretically predicted variance but only the standard deviation of the background counting rate or the counting rate of a blank sample (as appropriate.)

Question:

The same situation exists for TS Table 4.11-2, page 3/4 11-9, and ODCM Table 3.2-1, page 3-29.

Response:

The response is identical to the previous response as it applies to ODCM Table 3.2-1, page 3-29.

Question:

TS 3.11.3, Solid Radioactive Waste, page 3/4 11-17, specifies requirements for "solidification or dewatering" of waste. The amendment

package indicates the requirements were relocated to the process control program, 0-HPA-045, Section 5.1; however this section specifies "solidification" and not "solidification and dewatering" as the current TS states. Please explain the justification for not including the TS requirements for dewatering or specify the correct PCP reference.

Response:

The Technical Specification requirements for "dewatering" have been included in section 5.3 of 0-HPA-045.

Question:

TS 4.11.3.1 states that "Dewatering shall be performed in accordance with the PCP." The amendment package indicates that this requirement was relocated to PCP section 6.2.4 of attachment 1. This section of the PCP does not contain the TS statement. Section 5.3 of the PCP does discuss dewatering. Please specify the correct relocation reference.

Response:

The correct relocation reference is Process Control Program (PCP), 0-HPA-045 section 5.3.

Question:

The amendment request, attachment 1, page 22, indicates that TS 4.11.3.2a, 2b, and 2c, were relocated to 0-HPA-045 sections 6.2.4(1), (2), and (3) respectively. It appears that this is incorrect and should state that these requirements were relocated to sections 6.2.4(2), (3), and (4). Please specify the correct relocation reference.

Response:

The correct reference is relocation to sections 6.2.4(2), (3), and (4) of 0-HPA-045.

Question:

TS Table 4.12-1, page 3/4 12-8 indicates 0.01 pCi/m³ airborne limit for gross beta and none for H-3. The submittal indicates that the Table 4.12-1 requirements were relocated to ODCM table 5.1-3. ODCM table 5.1-3, page 5-7, indicates a 0.01 pCi/m³ limit for H-3 and none for gross beta. It appears that this change is in error. Please discuss this change.

Response:

The location of the 0.01 pCi/m³ in the row for H-3 is in error and the value should appear in the Gross Beta row. Attached is a corrected page for inclusion in your copy of the ODCM.

Question:

TS 6.15, Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems, indicates that the specification covers liquid, gaseous, and solid systems. The amendment request indicates that the requirements

were relocated to ODCM 1.2 which is titled Major Changes to Liquid, Gaseous and Solid Radwaste Systems. However, the body of the ODCM sections states "Licensee-initiated major changes to the Liquid and Gaseous, and Radwaste Treatment Systems:" and solid radwaste is not mentioned. What is the justification for this change?

Response:

The word "Solid" was omitted in error. The page has been revised and is provided as an attachment to this request for additional information.

TURKEY POINT UNIT 3 & 4 OFFSITE DOSE CALCULATION MANUAL

5.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

CONTROL 5.1 : CONDUCT OF SAMPLING AND ANALYSIS (continued)

TABLE 5.1-3

DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS⁽¹⁾

LOWER LIMIT OF DETECTION (LLD) ⁽²⁾⁽³⁾

ANALYSIS	WATER (pCi/l)	AIRBORNE PARTICULATE OR GASES (pCi/m ³)	FISH (pCi/kg, wet)	SEDIMENT (pCi/kg, dry)	MILK (pCi/l)	FOOD PRODUCTS (pCi/kg, wet)
Gross Beta	4	0.01				
H-3	3,000*					
Mn-54	15		130			
Fe-59	30		260			
Co-58	15		130			
Co-60	15		130			
Zn-65	30		260			
Zr-Nb-95***	15 ⁽⁵⁾					
I-131	1 ⁽⁴⁾	0.07			1	60
Cs-134	15	0.05	130	150	15	60
Cs-137	18	0.06	150	180	18	80
Ba-La-140***	15 ⁽⁵⁾				15 ⁽⁵⁾	

* Since no drinking water pathway exists, a value of 3,000 pCi/l is used. For drinking water samples a value of 2,000 pCi/l is used.

TURKEY POINT UNIT 3 & 4 OFFSITE DOSE CALCULATION MANUAL

1.0 - ADMINISTRATIVE CONTROLS

CONTROL 1.2: MAJOR CHANGES TO LIQUID, GASEOUS AND SOLID RADWASTE TREATMENT SYSTEMS*

Licensee-initiated major changes to the Liquid, Gaseous, and Solid Radwaste Treatment Systems :

- a. Shall be reported to the Commission in the Annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PNSC. The discussion of each change shall contain:
 - (1) A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - (2) Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - (3) A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems;
 - (4) An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the License application and amendments thereto;
 - (5) An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the License application and amendments thereto;
 - (6) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the change is to be made;
 - (7) An estimate of the exposure to plant operating personnel as a result of the change; and
 - (8) Documentation of the fact that the change was reviewed and found acceptable by the PNSC.
- b. Shall become effective upon review and acceptance by the PNSC.

*Licensees may choose to submit the information called for in this Control as part of the annual FSAR update.

