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AUTH.NAME AUTHOR AFFILIATION
HOVEY,R.J. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-31 & DPR-41,revising TSs to allow Type A,B & C containment leakage tests to be conducted at intervlas determined by performance-based criteria.

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FPL

JUL 17 1996

L-96-081
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
Implementation of 10 CFR 50 Appendix J, Option B

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 to implement 10 CFR §50, Appendix J, Option B. The purpose of this amendment is to revise the Technical Specifications to allow Type A, B, and C containment leakage tests to be conducted at intervals determined by performance-based criteria. FPL requests review and approval of the proposed amendments by November 30, 1996.

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 Specifications changes is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications pages. FPL will implement a Containment Leakage Rate Testing Program in accordance with the guidelines provided in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," and Nuclear Energy Institute (NEI) 94-01, Rev 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," with the exceptions noted in this submittal.

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,

R. J. Hovey
Vice President
Turkey Point Plant

Attachments

cc: S. D. Ebneter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant
W. T. Russell, Director, NRR, USNRC
W. A. Passetti, Florida Department of Health and Rehabilitative Services

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L-96-081
Proposed License Amendments
Implementation of 10 CFR 50 Appendix J, Option B

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

R. 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
R. J. Hovey

Subscribed and sworn to before me this
17 day of July, 1996.

Olga Hanek

Olga Hanek
Name of Notary Public (Type or Print)

NOTARY PUBLIC, in and for the County of Dade, State of Florida

My Commission expires CC 562742
Commission No. June 18, 2000

R. J. Hovey is personally known to me.

OLGA HANEK
MY COMMISSION # CC 562742
EXPIRES: June 18, 2000
Bonded Thru Notary Public Underwriters

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

Changes are proposed to revise Turkey Point Units 3 and 4 Technical Specifications (TS) to implement 10 CFR §50, Appendix J, Option B, for containment leakage testing requirements. These changes are consistent with the recommendations of Nuclear Regulatory Commission (NRC) Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," and Nuclear Energy Institute (NEI) 94-01, Rev 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J."

Implementing Appendix J, Option B will allow Florida Power and Light Company (FPL) to perform containment leakage testing based on the performance history and risk significance of the components (containment, penetrations, and valves) rather than preset intervals. All Type A, B, and C testing requirements will be performed at intervals determined by the Containment Leakage Rate Testing Program created by this proposed amendment. The criteria for these new testing intervals will be evaluated per recorded performance history and the maximum allowed extensions per Regulatory Guide 1.163 and NEI 94-01.

Background

Containment leakage testing is currently required by 10 CFR §50, Appendix J at preset intervals specified by the TS. Testing is divided into three categories with Type A, B, and C classifications, depending on the type of component. Type A testing measures the primary reactor containment overall integrated leakage rate. Type B testing involves the measuring of each pressure-containing or leakage-limiting boundary, e.g. airlock doors and electrical penetrations. Type C testing measures the leakage rate of containment isolation valves.

Recent regulatory initiatives have focused on more performance-oriented and risk-based approaches to establishing regulatory safety standards. Consistent with this approach, the revision of 10 CFR §50, Appendix J, Option B, will allow the implementation of a performance-based containment leak testing program. This program is based in part on the findings presented in NUREG 1493, "Performance-Based Containment Leak-Test Program," and the guidance of NEI 94-01 and Regulatory Guide 1.163.

Discussion and Description of Proposed Changes

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

1. TS 3/4.6.1.1, Containment Integrity: Delete the requirement of TS 4.6.1.1.c.

   Justification: The requirements of TS 4.6.1.1.c are relocated to the Containment Leakage Rate Testing Program.

2. TS 3/4.6.1.2, Containment Leakage: Relocate the specific leakage requirements of 3.6.1.2 to the Containment Leakage Rate Testing Program. Revise the ACTION statement such that the overall containment leakage rates above which action must be taken reflect the current overall containment leakage rate limit of 1.0 L_a and to include the shutdown requirement when the measured overall containment leakage rate limit exceeds 1.0 L_a. The surveillance requirements for containment leakage will be relocated to the Containment Leakage Rate Testing Program.

   Justification: The specific requirements and surveillance requirements for containment leakage will be relocated to the Containment Leakage Rate Testing Program.

3. TS 3/4.6.1.3, Containment Air Locks: Relocate the specific requirements for TS 3.6.1.3.b, TS 4.6.1.3.a, and TS 4.6.1.3.b to the Containment Leakage Rate Testing Program. TS 3.6.1.3, TS 4.6.1.3.a and TS 4.6.1.3.b will be revised to reference the Containment Leakage Rate Testing Program.

   Justification: The specific requirements for containment air locks will be relocated to the Containment Leakage Rate Testing Program.

4. TS 3/4.6.1.6, Containment Structural Integrity: Revise TS 4.6.1.6.3 to reference the Containment Leakage Rate Testing Program as the guidance for containment visual inspection surveillance interval and recording requirements. Also, delete the requirement that the visual inspection must be performed during shutdown conditions only.

   Justification: The specific requirements for containment leakage will be relocated to the Containment Leakage Rate Testing Program. Performance of the containment visual inspection does not need to be only performed during shutdown. Portions of the visual inspection outside containment may be verified prior to shutdown, thereby facilitating greater ease in scheduling.

5. TS 6.8.4.(f), Containment Leakage Rate Testing Program: This program shall be established, implemented, and maintained to provide guidance and specific requirements for the performance-based containment leakage testing in accordance with 10 CFR §50,

Appendix J, Option B and Regulatory Guide 1.163. Note: The (f) denotes that 6.8.4.f is the current sequential location for a new administrative program. Due to other pending submittals, this location could change prior to issuance. Current exemptions and/or deviations shall be noted in the program contents.

Justification: The performance-based containment leakage program endorsed by 10 CFR §50, Appendix J, Option B and Regulatory Guide 1.163 will be governed under these new programmatic controls. The following exemptions and/or deviations will be used in the implementation of Option B:

1) Type A tests shall be performed in accordance with Bechtel Topical Report BN-TOP-1 Revision 1, dated November 1, 1972, or the guidance of ANS 56.8-1994, as recommended by Regulatory Guide 1.1.63. BN-TOP-1 was used as the initial method of Type A testing, and its use is permitted by 10 CFR §50, Appendix J.

2) A vacuum test will be performed in lieu of a pressure test for the airlock door seals. This exemption was granted by the NRC as Amendment 73/67, dated 11/4/81.

The specific leakage rate acceptance criteria will be located in the program description. The surveillance interval requirements and performance-based criteria will reside in the plant-controlled administrative procedure used to implement and maintain the Containment Leakage Rate Testing Program, in accordance with NEI 94-01 and Regulatory Guide 1.163.

The accident analyses assumptions use 1.0 L_a as the basis for containment leakage in determining that the limits of 10 CFR §100 are not exceeded. Therefore the use of 1.0 L_a as the acceptance limit for total integrated leakage from performance of one Integrated Leak Rate Test to the next, assuming that the total integrated as-left leakage was less than 0.75 L_a, will be in accordance with current accident analysis guidelines.

Summary

The proposed revision to Turkey Point TS by adopting 10 CFR §50, Appendix J, Option B, will allow the licensee to use a set of performance-based criteria to determine the leakage rate testing requirements for components that contribute to containment leakage. This type of programmatic control is endorsed and approved by the NRC as stated in Regulatory Guide 1.163. The criteria used by the licensee will be in accordance with Regulatory Guide 1.163 and NEI 94-01, as modified by approved exemptions.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

The proposed license amendments involve changes to the existing Technical Specifications (TS) of Turkey Point Units 3 and 4. These changes are consistent with guidance provided by Nuclear Regulatory Commission (NRC) Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," and Nuclear Energy Institute (NEI) 94-01, Rev 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J." These changes do not affect plant design or the modes of plant operation. The proposed amendment will implement 10 CFR §50, Appendix J, Option B, which details a performance-based program for containment leakage testing. The following proposed changes are requested:

1. TS 3/4.6.1.1, Containment Integrity: Delete the requirement of TS 4.6.1.1.c. The requirements of TS 4.6.1.1.c are relocated to the Containment Leakage Rate Testing Program.

2. TS 3/4.6.1.2, Containment Leakage: Relocate the specific leakage requirements of 3.6.1.2 to the Containment Leakage Rate Testing Program. Revise the ACTION statement such that the overall containment leakage rates above which action must be taken reflect the current overall containment leakage rate limit of 1.0 L_a and to include the shutdown requirement when the measured overall containment leakage rate limit exceeds 1.0 L_a. The surveillance requirements for containment leakage will be relocated to the Containment Leakage Rate Testing Program.

3. TS 3/4.6.1.3, Containment Air Locks: Relocate the specific requirements for TS 3.6.1.3.b, and TS 4.6.1.3.b to the Containment Leakage Rate Testing Program. TS 3.6.1.3.b, TS 4.6.1.3.a and TS 4.6.1.3.b will be revised to reference relocation of the specific requirements to the Containment Leakage Rate Testing Program.

4. TS 3/4.6.1.6, Containment Structural Integrity: Revise TS 4.6.1.6.3 to reference the Containment Leakage Rate Testing Program as the guidance for containment visual inspection surveillance interval and recording requirements. Also, delete the requirement that the visual must be performed during shutdown conditions only.

5. TS 6.8.4.(f), Containment Leakage Rate Testing Program: This program shall be established, implemented, and maintained to provide guidance and specific requirements for the performance-based containment leakage testing in accordance with 10 CFR §50, Appendix J, Option B and Regulatory Guide 1.163. Note: The (f) denotes that 6.8.4.f is the current sequential location for a new administrative program. Due to other pending submittals, this location could change prior to issuance. Current exemptions

and/or deviations shall be noted in the program contents.

The overall containment leakage rate limit of 1.0 L_a is consistent with TS 3.6.1.2. Leakage rates are to be less than 0.75 L_a for integrated leakage (Type A) and 0.60 L_a for combined Type B and C leakage prior to increasing primary coolant temperature above 200°F after leakage rate testing. The statement that Specification 4.0.2 is not applicable is relocated from TS 4.6.1.2.

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:

a) These proposed changes are all consistent with NRC requirements and guidance for implementation of 10 CFR 50, Appendix J, Option B.

b) Based on industry and NRC evaluations performed in support of developing Option B, these changes potentially result in a minor increase in the consequences of an accident previously evaluated due to the expanded testing intervals. However, the proposed changes do not result in an increase in the core damage frequency since the containment system is used for mitigation purposes only.

c) These changes are expected to result in increased attention to components with poor leakage test history as part of the performance-based nature of Option B, such that the marginally increased consequences from the expanded testing intervals may be further reduced or negated.

Therefore, these changes do 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 use of the modified specifications can not create the possibility of a new or different kind of accident from any 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 implementation of a performance-based program for containment leakage rate testing, 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, 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 basically unchanged by the proposed amendments due to the following reasons:

a) The acceptance criteria for total integrated containment leakage of 1.0 L_a is consistent with the current technical specifications and is within the design basis accident assumptions, and therefore does not reduce the margin of safety.

b) The increase in intervals between leak-test surveillances will not significantly reduce the margin of safety as shown by findings in NUREG 1493, "Performance-Based Containment Leak-Test Program", which was based on implementation of the performance-based testing of Option B.

Therefore these changes do not involve a significant reduction in the margin of safety.

Summary

Based on the above, 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, (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.