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 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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 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, deleting
 license conditions 3.I,3.K,3.H,3.K & 4 & incorporating
 recent organization change in TS 6.5.1.2 & 6.5.3.1.a.

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L-98-16
10 CFR §50.36
10 CFR §50.90

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Administrative Changes to Facility
Operating Licenses and Technical Specifications

In accordance with 10 CFR §50.90, Florida Power and Light Company (FPL) requests to amend the Turkey Point Unit 3 Facility Operating License DPR-31 to delete the license conditions 3.I, 3.K, and 4, and to amend the Turkey Point Unit 4 Facility Operating License to delete license conditions 3.H, 3.K. In addition, the proposed amendments modify Appendix A of the Facility Operating Licenses DPR-31 and DPR-41 of the Turkey Point Units 3 and 4 Technical Specifications (TS) to delete outdated references from TS Figure 5.1-2, and to incorporate a recent organization change in TS 6.5.1.2 and 6.5.3.1.a.

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 Facility Operating Licenses and Technical Specification pages.

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,

R. J. Hovey
Vice President
Turkey Point Plant

SM
Attachments

cc: L. A. Reyes, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant
W. A. Passetti, Florida Department of Health and Rehabilitative Services

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Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendments
Administrative Changes to Facility
Operating Licenses and Technical Specifications

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.


R. J. Hovey

Subscribed and sworn to before me this

12th day of March, 1998.



Name of Notary Public (Type or Print)



R. J. Hovey is personally known to me.

ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

The proposed amendments revise the Turkey Point Units 3 and 4 Facility Operating License and the Technical Specifications (TS) to remove certain license conditions that have been complied with, to remove outdated references, and to incorporate an organizational change. These proposed changes represent an administrative update to the Turkey Point Units 3 and 4 Facility Operating Licenses and to the TS. Each of the proposed changes is discussed in detail below.

Background

A review of the Turkey Point Units 3 and 4 Facility Operating Licenses found that the license conditions for the Steam Generator Repair Program and the Integrated Schedule, have been complied with and are not needed as part of the Facility Operating License Conditions.

In addition, a periodic TS review identified that Figure 5.1-2 references TS Tables 4.11-1 and 4.11-2. These tables were deleted from the TS and they were relocated to the Offsite Dose Calculation Manual (ODCM) via Amendments 188/182.

Effective January 30, 1998, the Services Manager position was eliminated as a result of a Services Department reorganization. The Protection Services Manager has been assigned the responsibilities associated with the requirements of the Technical Specifications 6.5.1.2 and 6.5.3.1.a.

FPL proposes to amend the following Operating License Conditions and TS to remove the outdated material and to incorporate the organizational changes.

Discussion and Description of Proposed Changes

The following changes shown in Attachment 3 are proposed:

1. FPL Docket No. 50-250 Facility Operating License

- a. Recommendation: Remove the Operating License Condition 3.I, "Steam Generator Repair Program", including the corresponding footnotes associated with the specific license conditions in these sections. Add the word DELETED.

Justification: Section 3.I.(1) references the Steam Generator Repair Program. Section 3.I.(2) provide the temporary license conditions that were imposed during the Steam Generator Repair Program. The proposed change will remove the Steam Generator Repair Program and the temporary license conditions since they have been complied with and are no longer in effect.

- b. Recommendation: Remove the Operating License Condition 3.K, "Integrated Schedule". Add the word DELETED.

Justification: Sections 3.K.1 and 3.K.2 reference the Integrated Schedule license conditions which remained in effect until December 31, 1991. This proposed change will remove these license conditions since they have been complied with and are no longer in effect.

- c. Recommendation: Remove Section 4 of the Operating License Conditions and renumber Section 5 to Section 4.

Justification: Section 4 refers to the implementation of recommendations set forth in paragraphs 7b and 7c of the Summary and Conclusions section of the Final Environmental Statement Related to Operation of Turkey Point and FPL's requirement to submit to the Atomic Energy Commission (AEC) for review and approval these recommendations no later than August 18, 1972. FPL has complied with the above license condition. This amendment change will remove section 4, and will renumber Section 5 to Section 4.

2. FPL Docket No. 50-251 Facility Operating License

- a. Recommendation: Remove the Operating License Condition 3.H, "Steam Generator Repair Program", including the corresponding footnotes. Add the word DELETED.

Justification: Section 3.H.(1) references the Steam Generator Repair Program. Section 3.H.(2) provide the temporary license conditions that were imposed during the Steam Generator Repair Program. The proposed amendment will remove the Steam Generator Repair Program and the temporary license conditions since they have been complied with and are no longer in effect.

- b. Recommendation: Remove the Operating License Condition 3.K, "Integrated Schedule". Add the word DELETED.

Justification: Sections 3.K.1 and 3.K.2 provide the Integrated Schedule license conditions that remained in effect until December 31, 1991. The proposed change will remove these license conditions since they have been fulfilled and are no longer in effect.

3. TS Figure 5.1-2, Plant Area Map

Recommendation: Delete the reference of TS Tables 4.11-1, and 4.11-2 from TS Figure 5.1-2.

Justification: TS Table 5.1-2, "Plant Area Map" shows gaseous and liquid effluent release points. The referenced TS Table 4.11-1 "Radioactive Liquid Waste Sampling and Analysis Program" and Table 4.11-2 "Radioactive Gaseous Waste Sampling and Analysis Program" were

relocated from the TS to the Offsite Dose Calculation Manual (ODCM) with the approval of License Amendment 188/182. These references do not provide any additional information regarding the identification of structures and release points. The deletion of the reference to these tables from TS Figure 5.1-2 is an administrative change intended to remove outdated references.

4. TS 6.5.1.2 Plant Nuclear Safety Committee (PNSC) Composition and TS 6.5.3.1 Technical Review and Control Activities

Recommendation: Add the word "Protection" in front of the word "Services" for TS 6.5.1.2 and add the word "Protection" in front of the words "Services Manager" for TS 6.5.3.1.a.

Justification: The word "Protection" is added in front of the word "Services" in TS 6.5.1.2 and in front of the words "Services Manager" to reflect the organizational change which eliminated the Services Manager position and assigned the responsibilities of TS 6.5.1.2 and 6.5.3.1.a to the Protection Services Manager. The associated levels of management controls and the required qualifications are not affected by this change. Accordingly, the Protection Services Manager will be a voting PNSC member and will be responsible for the Security Plan and implementing procedures.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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 changes are administrative in nature removing fulfilled license conditions, outdated Technical Specification referenced material, and reflecting an organizational change. These amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated because they do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Therefore, the proposed changes do 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 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 administrative changes 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 unchanged by the proposed amendments. The organizational change from Services Manager to Protection Services Manager maintained the associated level of management controls and the required qualifications. The proposed changes to the Facility Operating License Conditions and to the Technical Specifications are administrative and do not significantly reduce any of the margins of safety.

Based on the above, 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, (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.