

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9804100270 DOC.DATE: 98/03/31 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
AUTH.NAME AUTHOR AFFILIATION
HOVEY,R.J. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Requests change to plant radiological emergency plan.
Proposed change is rev of declaration threshold for EAL of
unusual event involving RCS leakage.Comparison of current
threshold to proposed declaration,encl.

DISTRIBUTION CODE: A045D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
TITLE: OR Submittal: Emergency Preparedness Plans, Implement'g Procedures, C

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-3 LA	1 1	PD2-3 PD	1 1
	JABBOUR,K	1 1		
INTERNAL:	AEOD/HAGAN,D	1 1	FILE CENTER 01	2 2
	NRR/DRPM/PERB	1 1	NUDOCS-ABSTRACT	1 1
EXTERNAL:	NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 10 ENCL 10



MAR 31 1998
L-97-290
10 CFR 50.54(q)

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

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed Change to Emergency Plan Table 3-1, Emergency Classification Table

Pursuant to Title 10 Code of Federal Regulations (CFR) §50.54(q), Florida Power & Light Company (FPL) requests approval, prior to implementation, of a change to the Turkey Point Plant Radiological Emergency Plan.

The proposed change is a revision of the declaration threshold for the Emergency Action Level of an Unusual Event involving Reactor Coolant System (RCS) leakage. The attachment to this letter compares the current threshold for an Unusual Event declaration for RCS leakage to the proposed declaration, and includes FPL's justification for the proposed change.

The proposed change was reviewed by the Turkey Point Plant Nuclear Safety Committee (PNSC), and by the state and local governments. On receipt of approval from the NRC, FPL will revise the Turkey Point Plant Emergency Plan and Emergency Plan Implementing Procedure 20101, Duties of Emergency Coordinator, to implement these proposed changes.

If you have any questions, please contact Mr. John Kirkpatrick at 305-246-6226.

Sincerely,

R. J. Hovey
Vice President
Turkey Point Plant

CLM

Attachment

Copies to: Regional Administrator, USNRC Region II (2 copies)
Senior Resident Inspector, USNRC, Turkey Point Plant

9804100270 980331
PDR ADOCK 05000250
F PDR

11
A042

Proposed Change to Turkey Point Nuclear Plant
Emergency Plan Table 3-1, Emergency Classification Table
Declaration of Unusual Event Involving Reactor Coolant System Leakage

Current Emergency Action Level

Turkey Point Plant Emergency Plan Table 3-1, Emergency Classification Table

Category 1 - Primary Leakage/LOCA

UNUSUAL EVENT

Plant in Mode 1-2-3-4

AND

Either A or B:

A. RCS leakage in excess of Technical Specification 3.4.6.2, Reactor Coolant System Operational Leakage as indicated by either:

1) Unidentified RCS Leakage >1 gpm,

OR

2) Identified RCS Leakage greater than ten (10) gpm,

OR

3) RCS Pressure Isolation Valve Leakage greater than allowable,

OR

4) Any Pressure Boundary Leakage

B. Failure of any primary system safety or relief valve to close resulting in an uncontrolled RCS depressurization.

Possible Control Room Indicators

TI-465, 467, 469
TEC Flow Indicators

**Proposed Change to Turkey Point Nuclear Plant
Emergency Plan Table 3-1, Emergency Classification Table
Declaration of Unusual Event Involving Reactor Coolant System Leakage**

Proposed Emergency Action Level

Turkey Point Plant Emergency Plan Table 3-1, Emergency Classification Table

Category 1 - Primary Leakage/LOCA

UNUSUAL EVENT

Plant in Mode 1-2-3-4

AND

Either A or B:

A. RCS leakage GREATER THAN 10 GPM as indicated by:

1) Control Room observation

OR

2) Inventory balance calculation

OR

3) Field observation

OR

4) Emergency Coordinator judgment

B. Failure of any primary system safety or relief valve to close resulting in an uncontrolled RCS depressurization.

Possible Control Room Indicators

TI-465, 467, 469
TEC Flow Indicators

**Proposed Change to Turkey Point Nuclear Plant
Emergency Plan Table 3-1, Emergency Classification Table
Declaration of Unusual Event Involving Reactor Coolant System Leakage**

Justification for Proposed Change

Background

Current initiating conditions (threshold values) in the Turkey Point Emergency Action Levels for declaring an Unusual Event involving Abnormal Primary Leak Rate are one gallon per minute (gpm) for unidentified reactor coolant system (RCS) leakage and 10 gpm for identified RCS leakage. The proposed change would incorporate, in part, the threshold values for RCS leakage of the Nuclear Management and Resources Council (now the Nuclear Energy Institute {NEI}) document NUMARC/NESP-007 classification scheme currently approved as part of Regulatory Guide 1.101.

Discussion

As discussed in the NUMARC/NESP-007 Technical Bases, a 10 gpm threshold for unidentified or pressure boundary leakage was chosen since it is observable using normal Control Room indications. Lesser values of RCS unidentified or pressure boundary leakage must generally be confirmed through time-consuming surveillance tests (e.g., RCS mass inventory balance).

FPL has elected to establish a single threshold value for RCS leakage (i.e., either identified or unidentified) independent of location. This change in initiating conditions will allow for prompt classification based on Control Room observation eliminating the time consuming need for the Control Room operators to differentiate between identified and unidentified RCS leakage in their decision making process for an emergency declaration.

Conclusion

FPL has concluded that the proposed change will improve overall emergency response capability. The 10 gpm threshold for RCS leakage is sufficiently low to provide early indication of an emergency condition and while consistently remaining within the licensing and technical assumptions for the progression of more significant emergency declarations.

The criteria for declaration of an Alert, Site Area Emergency, or General Emergency for RCS leakage will remain unchanged.

