



FPL

APR 26 1999

L-99-068  
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 both the Turkey Point Unit 3 Facility Operating License DPR-31 and Turkey Point Unit 4 Facility Operating License DPR-41 to delete an obsolete part of license condition 3.L. 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 incorporate administrative changes to the TS Index, T/S 3/4.1.2.5 and TS 3/4.7.6.

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 is 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

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Attachments

cc: Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant  
Florida Department of Health and Rehabilitative Services

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Turkey Point Units 3 and 4  
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STATE OF FLORIDA )  
 ) ss.  
COUNTY OF MIAMI-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.

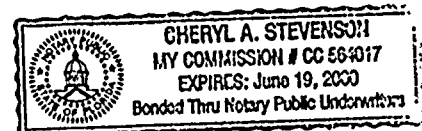
MIS

R. J. Hovey

Subscribed and sworn to before me this

26<sup>th</sup> day of April, 1999.

Cheryl A. Stevenson



Name of Notary Public (Type or Print)

R. J. Hovey is personally known to me.

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ATTACHMENT 1

DESCRIPTION OF AMENDMENTS REQUEST

Description and Purpose

The purpose of the proposed amendments is to revise the Turkey Point Units 3 and 4 Facility Operating License and the Technical Specifications (TS) to remove part of the license condition 3.L that is obsolete, to update the TS Index to reflect all changes made to the TS Sections, TS Figures, and TS Tables via previously approved license amendments which have not been captured. Additionally, these amendments remove Table and Figure numeration inconsistencies found in TS 3/4.1.2.5 and TS 3/4.7.6. 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 part of the license condition 3.L is obsolete and is not needed as part of the Facility Operating License conditions. A periodic TS review identified inconsistencies between the TS Index and the TS sections, TS Tables and TS Figures. These inconsistencies resulted from not always updating the TS Index at the time of issuance of license amendments. The review further identified that there are two different TS Tables 4.7-1, numbered the same, and that TS Figure 3.1.2.5 is not numbered sequentially.

FPL proposes to amend the following Operating License Conditions and TS to remove outdated information and inconsistencies.

Discussion and Description of Proposed Changes

The following changes, shown in Attachment 3, are proposed:

1. FPL Docket No. 50-250, and 50-251 Facility Operating Licenses

Proposal: Remove part of the Operating License Condition 3.L. Specifically remove the following:

The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Turkey Point Plant, Units 3 and 4 Security Plan," with revisions submitted through April 13, 1988; "Turkey Point Plant, Units 3 and 4, Training and Qualification Plan," with revisions submitted through December 18, 1986; and "Turkey Point Plant, Units 3 and 4 Safeguards Contingency Plan," with revisions submitted through July 15, 1985. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

Justification: The part of condition 3.L for both Turkey Point Units 3 and 4, which is proposed to be removed, references specific titles and revisions for each of the plans. It states that the plans contain Safeguards Information, and commits FPL to implement changes in accordance with a schedule in 10 CFR 73.55. FPL completed the referenced changes in accordance with the schedule in 10 CFR 73.55. Additionally, the Training and Qualification Plan (currently titled the Security Training and Qualification Plan) was previously revised to remove all Safeguards Information. All three plans have been amended since the dates shown in 3.L pursuant to the authority of 10 CFR 50.54(p). The revision dates shown in 3.L are obsolete. Therefore, the information provided in the part that is proposed for deletion is obsolete. Deletion of the part of condition 3.L, which references these plans, does not change the plans or how these plans can be revised.

2. Proposal: Update TS Index to remove inconsistencies. The details of each TS Index change are found in Attachment 3.

Justification: Addition and deletion of TS text via previous license amendments has caused TS Index inconsistencies. FPL found that the TS Index was not always updated with the issuance of a license amendment, and as a result, the index contains outdated information. The proposed changes will update the index to contain the latest information that corresponds to the TS sections, TS Tables and TS Figures and renumber the TS Index pages to be sequential.

3. TS FIGURE 3.1.2.5, "BORIC ACID TANK MINIMUM VOLUME"

Proposal: Renumber the TS FIGURE "BORIC ACID TANK MINIMUM VOLUME" 3.1.2.5 to TS Figure 3.1-2.

Justification: TS Figure number 3.1.2.5 is inconsistent with the numbering system of the TS figures. The sequential figure number for the "BORIC ACID TANK MINIMUM VOLUME" figure is 3.1-2. The proposed change is an administrative change to renumber correctly the "BORIC ACID TANK MINIMUM VOLUME" figure.

4. TS 3/4.1.2.5, BORATED WATER SOURCES - OPERATING

Proposal: Change TS 3/4.1.2.5 to delete the reference to TS Figure 3.1.2.5 and to replace it with the reference to TS Figure 3.1-2.

Justification: The figure, "BORIC ACID TANK MINIMUM VOLUME," is referenced in TS 3/4.1.2.5 as 3.1.2.5. It is proposed to change the TS Figure number to 3.1-2. Accordingly, any references to the "BORIC ACID TANK MINIMUM VOLUME" TS Figure must be changed from TS Figure number 3.1.2.5 to TS Figure number 3.1-2. The proposed change is a conforming change to correct the reference of the "BORIC ACID TANK MINIMUM VOLUME" TS Figure to 3.1-2. No other TS section contain references to the "BORIC ACID TANK MINIMUM VOLUME" TS Figure.



5. TS TABLE 4.7-1, "SNUBBER VISUAL INSPECTION INTERVAL"

Proposal: Renumber the TS TABLE "SNUBBER VISUAL INSPECTION INTERVAL," from 4.7-1 to 4.7-2.

Justification: TS Table number 4.7-1 has been given to two different Tables. The table which is referenced in TS 3/4.7.6 should have been numbered 4.7-2 instead of 4.7-1. The proposed change is an administrative change to renumber the table in TS section 3/4.7.6 sequentially, namely TS Table 4.7-2.

6. TS 3/4.7.6, SNUBBERS

Proposal: Change TS 3/4.7.6 to delete the reference of TS Table 4.7-1 and to replace it with the reference to TS Table 4.7-2.

Justification: The table, "SNUBBER VISUAL INSPECTION INTERVAL," is referenced in TS 3/4.7.6 as 4.7-1. It is proposed to change the table number of TS 3/4.7.6 to 4.7-2. Accordingly, any references to the "SNUBBER VISUAL INSPECTION INTERVAL" table must be changed from TS Table number 4.7-1 to TS Table number 4.7-2. The proposed change is a conforming change to correct the reference of the "SNUBBER VISUAL INSPECTION INTERVAL" TS Table to 4.7-2. No other TS section contain references to the "SNUBBER VISUAL INSPECTION INTERVAL" TS Table.



## 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 obsolete references in the license conditions, updating the Technical Specification (TS) Index to reflect the revisions made to the TS Sections, Tables, and Figures via previous TS amendments. 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 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, 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.

