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HOVEY,R.J.                 Florida Power Corp.  
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SUBJECT: Application for amend to license DPR-31, modifying TSs 3.8.1.1, 3.4.3 & 3.5.2 to extend AOT for inoperable EDG from 72 hours to 7 days.

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JUL 27 1999

L-99-162

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

Re: Turkey Point Unit 3  
Docket No. 50-250  
One-Time Only Proposed License Amendment for  
Unit 3 Cycle 17 Emergency Diesel Generators Allowed Outage Time Extension

In accordance with 10 CFR §50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating License DPR-31 be amended on a one-time basis to modify Technical Specification (TS) 3.8.1.1 and TS 3.4.3, and 3.5.2 (conforming changes) to extend the Allowed Outage Time (AOT) for an inoperable Emergency Diesel Generator (EDG) from 72 hours to 7 days.

The proposed one-time AOT extension will be used to replace the Unit 3 EDG engine radiators prior to the Spring 2000 refueling outage. FPL believes that an on-line early replacement of the Unit 3 radiators represents a prudent and safety focused maintenance activity. Replacement of the radiator assemblies, however, is a very labor-intensive evolution that cannot be performed within the existing 72 hour AOT. The proposed AOT extension will allow the radiator replacement activity to be completed successfully in a safe manner. The extended AOT will be applied to one EDG at a time in a sequential manner. When the radiator replacement activity is complete on one engine, it will be returned to service so that work can proceed on the redundant EDG.

A description of the amendment request is provided in Attachment 1. FPL has determined that the proposed license amendment does not involve a significant hazards consideration pursuant to 10 CFR §50.92. The no significant hazards determination in support of the proposed TS change is provided in Attachment 2.

Attachment 3 provides the proposed revised TS pages. Note that although the proposed changes apply only to Unit 3, the Unit 4 TS is administratively affected since it is combined with Unit 3 into one TS that is applicable to both units.

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Turkey Point Unit 3  
Docket No. 50-250  
One-Time Only Proposed License Amendment for  
Unit 3 Cycle 17 Emergency Diesel Generators Allowed Outage Time Extension

In accordance with 10 CFR §50.91(b), a copy of the proposed license amendment is being forwarded to the State Designee for the State of Florida.

The proposed license amendment has been reviewed by the Turkey Point Plant Nuclear Safety Committee and the FPL Company Nuclear Review Board.

FPL requests that review and approval of this proposed amendment be expedited, since it is desirable to replace the radiators after the hurricane season, but prior to the spring 2000 refueling outage. Approval of the proposed TS amendment is requested by November 1999.

Should there be any questions, please contact us.

Very truly yours,



R. J. Hovey  
Vice President  
Turkey Point Plant

SM/MG

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


Turkey Point Unit 3  
Docket No. 50-250  
One-Time Only Proposed License Amendment for  
Unit 3 Cycle 17 Emergency Diesel Generators Allowed Outage Time Extension

STATE OF FLORIDA                     )  
  ) ss.  
COUNTY OF MIAMI-DADE            )

R. J. Hovey being first duly sworn, deposes and says:

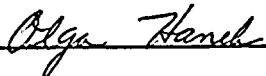
That he is Vice President, Turkey Point Plant, of Florida Power and Light Company, the Licensee herein;

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.

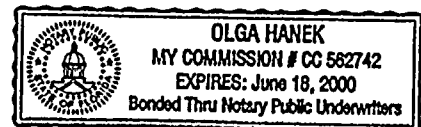
  
R. J. Hovey

Subscribed and sworn to before me this

26 day of July, 1999.

  
\_\_\_\_\_

Olga Hanek  
\_\_\_\_\_  
Name of Notary Public (Type or Print)



R. J. Hovey is personally known to me.

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## ATTACHMENT 1

### DESCRIPTION OF AMENDMENT REQUEST

#### 1.0 Introduction

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating License DPR-31 for Turkey Point Unit 3 Technical Specification (TS) 3.8.1.1, "A.C. Sources Operating", and the conforming TS 3.4.3, "Pressurizer" and 3.5.2, "ECCS Subsystems- $T_{avg}$  Greater than or Equal to 350 °F," be revised on a one-time basis to extend the Allowed Outage Time (AOT) for an inoperable Emergency Diesel Generator (EDG) from 72 hours to 7 days.

The purpose of the one-time extension is to permit replacement of the Unit 3 EDG radiators prior to the next scheduled refueling outage in the year 2000. The proposed extension is based on the anticipated time required to replace the engine radiator assemblies, perform post-maintenance testing, and complete any additional corrective actions that may be needed to restore the EDG to operable status. The 7-day AOT will ensure that the radiator replacement activity is completed successfully in a safe manner.

The AOT extension will be applied to one EDG at a time in a sequential manner. When the radiator replacement activity is complete on one engine, it will be returned to service so that work can proceed on the EDG on the redundant train.

#### 2.0 Need for the Proposed Technical Specification Change

Extensive maintenance was performed on the Unit 3 EDGs during the Fall 1998 refueling outage. However, maintenance on the engine radiators was limited to replacing and re-torquing the flange gasket bolts. Several through-wall leaks occurred during this activity when a mechanic's wrench accidentally struck a section of radiator tubes. The leaking tubes were subsequently plugged in preparation for unit start-up since replacement radiators were not available for a full replacement. One additional through-wall leak has been identified and repaired since Unit 3 returned to service in October 1998.

While the Unit 3 EDGs remain operable, FPL desires to perform an on-line early replacement of the Unit 3 EDG radiators to maintain EDG reliability within established limits. Although this on-line early replacement represents a prudent and safety focused maintenance activity, it can not be performed within the existing AOT of 72 hour. The proposed amendment requests that the AOT be extended from 72 hours to 7 days.

The duration of the requested AOT is based on the anticipated time required to erect the necessary scaffolding and lift rigs, remove and replace the radiators, perform post-maintenance testing, and complete any additional corrective actions that may be needed to restore the EDGs to operable status. Each radiator is assembled from eight core assemblies. Replacing an EDG radiator is a labor intensive activity that requires that sections of missile shield grating be removed, heat deflecting cowling be cut away, and support structures be built above and around the existing radiators to facilitate the fitup process. Allowing for contingencies, extending the out of service time an additional 96 hours provides a high probability that the proposed replacement activity will be successful while being performed in a safe manner.

### **3.0 Current Technical Specification (TS) Requirements**

Technical Specification 3.8.1.1, "A.C. Sources Operating", requires that three separate and independent EDGs be operable in Modes 1, 2, 3, and 4. For Unit 3, this includes the 3A and 3B EDGs plus one from Unit 4, either the 4A or 4B EDG. In the event that one of the required EDGs becomes inoperable, the limiting condition for operation (LCO) requires the inoperable EDG to be returned to operable status within 72 hours or the plant must transition to Hot Standby (Mode 3) within 6 hours, and be placed in Cold Shutdown (Mode 5) within the following 30 hours. If two of the required EDGs become inoperable, at least one of the inoperable EDGs must be returned to operable status within 2 hours or the plant must be brought to Hot Standby conditions within the next 6 hours and to Cold Shutdown conditions within the following 30 hours. Both inoperable EDGs must be returned to operable status within 72 hours or the plant must be in at least Hot Standby conditions within the next 6 hours and Cold Shutdown within the following 30 hours. The operability of a Unit 4 EDG is required for Unit 3 in Modes 1, 2, 3, and 4 to satisfy the single active failure criterion for high head safety injection pumps, battery chargers, and other shared equipment required during a Loss of Coolant Accident (LOCA) coincident with a Loss of Offsite Power (LOOP). A footnote to TS 3.8.1.1, acknowledges that compliance with TS 3.5.2, "ECCS Subsystems-T<sub>avg</sub> Greater than or Equal to 350 °F", and 3.8.2.1 "D.C. Sources Operating", must be maintained whenever one or more of the four EDGs is removed from service.

Technical Specification 3.4.3, "Pressurizer," requires at least two groups of pressurizer heaters to be operable in Modes 1, 2, and 3. Each group is required to have a capacity of at least 125 kW and be capable of being supplied by an operable EDG. If one or more of heater groups are not operable, they must be restored to operable status within 72 hours, or the plant must be brought to at least Hot Standby conditions within the next 6 hours and to Hot Shutdown conditions within the following 6 hours.

Technical Specification 3.5.2, "ECCS Subsystems- $T_{avg}$  Greater than or Equal to 350 °F", requires in part that four High Head Safety Injection (HHSI) pumps be operable in Modes 1, 2, and 3. Each pump must be capable of being powered from its associated operable EDG, with discharge aligned to the reactor coolant system cold legs. If a required HHSI pump is operable but not capable of being powered from its associated EDG, the LCO requires that the EDG capability be restored within 72 hours or the plant be brought to Hot Standby conditions within the next 6 hours and to Hot Shutdown conditions within the following 6 hours.

#### 4.0 System Description

Each reactor at Turkey Point is provided with two redundant and independent EDG sets as a backup source of A.C. power for various electrical equipment loads. These standby power sources are designed to allow safe shutdown of the plant or operation of plant safety equipment during an accident when the preferred offsite power supply is interrupted. Although dedicated to a specific unit, each of the EDG sets supplies some loads that are common to both units. The "A" EDGs feed the "A" 4.16 kV buses and the "B" EDGs feed the "B" 4.16 kV buses of their respective units. The design of the plant electrical distribution system is such that any EDG can be cross-tied to either train of the opposite unit at the 4.16 kV level from the control room.

The Unit 3 system consists of two 2500 kW EDGs, each driven by a 20-cylinder diesel engine. Each EDG set includes a redundant and independent air start system, an independent fuel oil transfer system, and an independent cooling water system. The starting sequence of each EDG is independent from the other and is initiated by a signal from the engineered safety features actuation system or from a low voltage signal from its associated bus. The EDGs are designed to obtain rated speed and voltage within 15 seconds following the receipt of a start signal. In addition to the fast start capability, the system is designed to operate for an indefinite period of time (a 7-day fuel supply is maintained on site). The capacity of each EDG is sufficient to power a set of engineered safeguard equipment necessary for controlling a maximum hypothetical accident (MHA) on one unit, as well as the equipment necessary to maintain Hot Standby conditions on the opposite unit.

Each engine cooling water system includes a temperature control valve, cooling water pumps, radiator, radiator fan, and expansion tank. The pumps circulate cooling water through the engine block and lube oil cooler to remove engine heat. Flow through the radiator is regulated by the temperature control valve, which is designed to maintain the engine outlet temperature constant. The cooling water pumps and radiator fan are driven by the engine and therefore do not rely on any external power source.

The EDGs are enclosed in a reinforced concrete building. Heavy steel grating is used to provide an exit path for the hot radiator exhaust air through the building enclosure, and to protect the radiator assemblies from wind driven missiles.

## **5.0 Design Basis Requirements and Safety Analysis Impact**

The function of the EDGs is to provide a reliable source of A.C. power to the electric loads required for safe shutdown of the nuclear unit in the event that the preferred power source is interrupted. The EDGs accomplish this function for the following shutdown conditions:

- a) Loss of Offsite Power (LOOP) affecting one or both nuclear units;
- b) Design basis accident on one unit requiring mitigation of accident conditions and subsequent safe shutdown of the unit, together with placing and maintaining the non-accident unit in hot standby;
- c) Station Blackout conditions on the opposite unit.

In each case, the EDGs are required to provide a continuous source of A.C. power while maintaining voltage and frequency stability.

The condition, which imposes the most restrictive operating requirements on the EDG, is a Loss of Coolant Accident (LOCA) concurrent with a LOOP. This accident scenario assumes that safety injection flow to the core will be available within 25 seconds of the receipt of a safety injection actuation signal. To accomplish this, the EDGs are required to obtain rated speed and voltage within 15 seconds following the receipt of a start signal. An additional delay of 10 seconds is assumed to account for the undervoltage logic actuation, load sequencing, and safety injection pump acceleration times.

Currently, the TS allow one EDG to be out of service for up to 72 hours plus 6 hours to transition the affected unit to Hot Standby and an additional 30 hours to bring the unit to Cold Shutdown. The proposed amendment increases the AOT from 72 hours to 7 days. Extending the AOT will not impact any of the safety analyses currently described in the Turkey Point Updated Final Safety Analysis Report (UFSAR).

The UFSAR safety analyses assume that the continuous load rating of each EDG is sufficient to carry the LOOP shutdown loads of both Turkey Point nuclear units, or the MHA shutdown loads of one unit plus the LOOP shutdown loads of the other unit. Extending the unavailability of one EDG will not affect the single active failure criterion for HHSI pumps during any of the postulated accident sequences because only one of four HHSI pumps (each powered from a separate 4.16 kV bus, with all four pumps aligned to both units) is required to mitigate any design basis event. Thus, the unavailability of one EDG will not prevent accomplishment of the emergency power safety function and will not affect the operability of the Unit 4 EDGs either. Based on the defense in depth features inherent in the Turkey Point emergency power system and emergency core cooling systems, it is concluded that the unavailability of one EDG will not invalidate any of the plant safety analyses.

From a Probabilistic Safety Assessment (PSA) perspective, the simultaneous occurrence of a LOOP and a LOCA is a very low frequency event. The rarity exists because there is no mechanistic link between the two failure conditions. The simultaneous occurrence of these events does not represent a significant risk of core damage.

## **6.0 Assessment of Impact on Risk**

This section presents the analysis and assumptions used to determine the impact on plant risk associated with the one-time extension of the Unit 3 EDG AOT from 72 hours to 7 days. The information is presented using the three-tiered approach outlined in Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." The analysis also uses guidance given in Electric Power Research Institute (EPRI) report TR-105396, "PSA Applications Guide," and Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."

Section 6.1 addresses issues related to the PSA calculation. It includes an evaluation of the impact on plant risk of the proposed one-time extension, as expressed by the Core Damage Probability (CDP) and Large Early Release Probability (LERP) associated with the 7-day EDG outages. Section 6.2 addresses those mechanisms that will be used to avoid risk-significant plant configurations during the EDG outages. Section 6.3 discusses issues related to risk-informed plant configuration control and management. The quality of the Turkey Point PSA model and the reliability/unavailability databases used in the risk assessment are described in Section 6.4.

6.1 Tier 1: Probabilistic Risk Assessment of the Proposed Change

A risk assessment of a one-time increase in the EDG AOT from 72 hours to 7 days has been performed using the Turkey Point PSA model. The calculated CDP for a seven-day EDG outage is  $6.86\text{E-}07$  for the "A" EDG and  $6.77\text{E-}07$  for the "B" EDG. The calculated LERP for the 7-day EDG outage is  $4.12\text{E-}08$  for the "A" EDG and  $4.06\text{E-}08$  for the "B" EDG. The EPRI PSA Applications Guide defines non-risk-significant temporary changes as those with a CDP of less than  $1\text{E-}06$  and a LERP of less than  $1\text{E-}07$ . With each 7-day EDG outage representing an independent event, all of the calculated values above meet the EPRI PSA Applications Guide definition of non-risk-significant.

With the current TS AOT, there is a possibility that a radiator tube failure or leak occurring during on-line operation may result in a need to shut down the reactor if the radiator replacement activity on the affected EDG is anticipated to take longer than 72 hours. A plant shutdown involves some risk of initiating a transient or challenging safety systems. The CDP given that a reactor trip has occurred during on-line conditions is  $2.76\text{E-}06$ . If a 10% probability of a reactor trip occurring during manual shutdown is assumed, then the CDP given an attempt to manually shut down the unit is  $(2.76\text{E-}06)(0.1) = 2.76\text{E-}07$ . The associated LERP is  $1.65\text{E-}08$ . These values are comparable to the CDP and LERP values calculated for the 7-day AOT extension, as discussed above. The overall impact of the AOT extension calculated above is reduced by the risk associated with manually shutting down the unit. Furthermore, considering that the EDG outages may not last the entire seven days, and that the radiator replacements are expected to improve EDG reliability, the one-time EDG AOT extension is very likely risk-beneficial or risk-neutral.

The PSA model used to calculate the estimated risk impact of the proposed one-time AOT extension does not include an assessment of the potential risk due to internal fires and external events. The Turkey Point response to Generic Letter 88-20, Supplement 4, Individual Plant Examination of External Events for Severe Accident Vulnerabilities (IPEEE), concluded that there are no severe accident vulnerabilities due to an internal fire or an external event. Accordingly, FPL estimates that any potential impact the proposed one-time AOT extension could have on the risk due to fires and external events would be very small and well within the EPRI PSA Applications Guide definition for non-risk-significant temporary changes.

## 6.2 Tier 2: Avoidance of Risk-Significant Plant Configurations

The objective of Tier 2 is to provide reasonable assurance that risk-significant plant equipment in outage configurations will not occur when the 3A or 3B EDG is removed from service as part of a risk-informed AOT. Risk-significant configurations will be avoided during the 7-day AOT EDG in accordance with procedure 0-ADM-210, "On-Line Maintenance/Work Coordination." A contemporaneous assessment of the overall impact on safety of proposed plant configurations prior to and during performance of the EDG repair activity will be performed per procedure 0-ADM-210 using the EPRI Equipment Out Of Service (EOOS) on-line risk monitor program. If a concern exists which is not addressed by 0-ADM-210, the procedure requires that the Reliability Risk Assessment Group and Plant Management be notified for evaluating the risk. As an additional measure of conservatism, no load threatening surveillance tests will be performed concurrent with each 7 day EDG outage. On-line replacement of the radiators will not be scheduled during the South Florida hurricane season. Hurricane force winds and debris can cause a significant amount of damage to the offsite electrical distribution system and significantly increase the potential for a LOOP event. The 1999 South Florida hurricane season begins on June 1 and ends six months later, on November 30.

## 6.3 Tier 3: Configuration Risk Management Program

The objective of this third tier is the development of a proceduralized program, which helps to ensure the risk impact of out-of-service equipment is evaluated prior to performing and during performance of any on-line maintenance activity. It is an extension of the second-tier requirement in that it addresses the difficulty of identifying all possible risk-significant configurations in a Tier 2 evaluation that would be encountered over extended periods of plant operation.

Addressing third-tier requirements is considered to be outside the scope of this one-time risk-informed AOT extension. However, as mentioned above, the EOOS on-line risk monitor program will be used before and during the EDG outages to assess the impact on safety of proposed plant configurations.

#### 6.4 Quality of the Turkey Point PSA Analysis

The Turkey Point PSA model is an updated version of the original Turkey Point Individual Plant Examination (IPE) submittal. Prior to the IPE being submitted to the Nuclear Regulatory Commission (NRC), a peer review was conducted by an outside contractor. The Turkey Point IPE was submitted to the NRC on June 25, 1991. It was reviewed extensively by the NRC and NRC contractors. In fact, the Turkey Point IPE was one of the few IPE submittals to receive a "Step 1" and a "Step 2" review by the NRC. The "Step 2" review consisted of a team of NRC representatives and contractors visiting FPL to conduct a weeklong, extensive review of the Turkey Point IPE. Following these reviews, the Turkey Point IPE was revised in early 1992, and FPL received the NRC Safety Evaluation Report (SER) for the Turkey Point IPE on October 15, 1992. The SER concluded that the Turkey Point IPE had met the intent of Generic Letter 88-20, which was to identify any plant-specific vulnerability.

Since the IPE submittal, the Turkey Point PSA model was updated in 1993, 1995, and 1997 to reflect changes in plant configuration, accumulation of plant-specific operating and component failure data, and advances in PSA technology, with the intent of keeping the PSA model "living". A recent (1999) review of plant modifications since the last PSA model update revealed that none of the modifications had an impact on the PSA model. All of the updates since the initial IPE submittal have been documented and reviewed via engineering evaluations and calculations. The FPL Reliability Risk Assessment Group (RRAG) controls modifications to the Turkey Point PSA model via its own update and maintenance procedure. Quality assurance of the software used to perform the modifications is implemented via the RRAG's software validation and verification procedures.

## 7.0 Technical Specification Change Request

The following changes to Technical Specification Action Statements 3.8.1.1.b, 3.8.1.1.f, and the conforming changes to 3.4.3.a, and 3.5.2.f are requested for Unit 3 on a one-time basis (The proposed changes are shown in Attachment 3):

- a) Add a footnote, denoted by "\*\*\*" to Action Statement 3.8.1.1.b to read as follows:

"With one of the required diesel generators inoperable, demonstrate the OPERABILITY of the above required startup transformers and their associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. Restore the inoperable diesel generator to OPERABLE status within 72 hours\*\* or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

**\*\* 7 days for a Unit 3 diesel generator if the inoperability is associated with replacement of the engine radiators prior to April 2000.**

- b) Add a footnote, denoted by "\*\*\*" to Action Statement 3.8.1.1.f to read as follows:

"With two of the required diesel generators inoperable, demonstrate the OPERABILITY of two startup transformers and their associated circuits by performing the requirements of Specification 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore all required diesel generators to OPERABLE status within 72 hours\*\* from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

**\*\* 7 days for a Unit 3 diesel generator if the inoperability is associated with replacement of the engine radiators prior to April 2000.**

- c) Add a footnote, denoted by "\*\*\*" to Action Statement 3.4.3.a to read as follows:

"With only one group of pressurizer heaters OPERABLE, restore at least two groups to OPERABLE status within 72 hours\*\* or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours."

**\*\* 7 days if the inoperability is associated with an inoperable Unit 3 diesel generator removed from service for radiator replacement prior to April 2000.**

- d) Add a footnote, denoted by "\*\*\*\*" to Action Statement 3.5.2.f to read as follows:

"With a required Safety Injection pump OPERABLE but not capable of being powered from its associated diesel generator, restore the capability within 72 hours\*\* or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours."

**\*\* 7 days for a Unit 3 diesel generator if the loss of capability is associated with replacement of the engine radiators prior to April 2000.**

The requirement to comply with Technical Specification 3.8.2.1 when one or more of the four diesel generators is out of service is not impacted by the above amendment request.

## ATTACHMENT 2

### NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

#### Introduction

The Nuclear Regulatory Commission has provided standards for determining whether a significant safety 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 amendment.

#### Discussion

- (1) **Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The Emergency Diesel Generators (EDG) are part of the on-site electrical power distribution system. They function as a standby power source in the event that the preferred A.C. power supply, i.e., offsite power, is interrupted. While certain failures in the electrical distribution system can lead to a loss of offsite power which is a design basis event for the plant, the EDGs are not assumed to be an initiating condition of any accident evaluated in the safety analysis report. Therefore, a one-time extension in the EDG Allowed Outage Time (AOT) does not involve a significant increase in the probability of an accident previously evaluated.

The purpose of the proposed license amendment is to permit on-line replacement of the Unit 3 EDG radiators. The radiators are part of the closed-loop diesel engine cooling water system and do not interface with any system or component that contains radioactivity. The EDGs do supply A.C. power to the emergency core cooling and containment heat removal systems during accidents that involve loss of offsite power. However, no changes are predicted for the postulated post-accident releases since adequate EDG capacity will be available under the conditions of the proposed license amendment to accommodate any design basis accident condition. Accordingly, the consequences of accidents previously evaluated in the safety analysis report are not changed by an extended EDG outage.

Probabilistic Safety Assessment (PSA) techniques were used to evaluate the impact of a one-time extension of the EDG AOT from 72 hours to 7 days. The results of these analyses indicate that extending the AOT for the purpose of replacing the engine radiator cores represents an acceptably small impact on Core Damage Probability.

Based on the above, FPL concludes that the proposed amendment does not involve a significant increase in the probability or consequences of any accident previously evaluated.

- (2) **Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any previously evaluated.**

The proposed change does not alter the design, physical configuration, or modes of operation of the plant. Plant configurations that are prohibited by Technical Specifications will not be created by the one-time EDG AOT extension. Therefore, the proposed activity does not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) **Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.**

The proposed license amendment will extend by 96 hours the requirement to shutdown the plant when a Unit 3 EDG is removed from service for maintenance. The one-time AOT extension will not alter plant equipment, setpoints, or operating practices that provide the existing margins of safety.

A PSA was performed to quantify the risk impact of the proposed one-time EDG AOT extension. The results of the PSA confirm that the proposed change has a very small impact on core damage probability and large early release probability.

Therefore, the change does not involve a significant reduction in a margin of safety.

## Summary

Based on the reasoning presented above, FPL has determined that the requested change does not involve a significant safety hazards consideration.