



March 22, 2018

L-2018-061

10 CFR 50.90

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Turkey Point Nuclear Plant, Units 3 and 4
Docket Nos. 50-250 and 50-251

Subject: Response to Fifth Request for Additional Information Regarding License
Amendment Request 236, Revision to the Technical Specifications to Adopt Risk
Informed Completion Times TSTF-505, Revision 1, "Provide Risk-Informed
Extended Completion Times – RITSTF Initiative 4b"

References:

1. Florida Power & Light Company letter L-2014-369, "License Amendment Request No. 236 Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B'," December 23, 2014 (ML15029A297)
2. NRC E-mail "Request for Additional Information re. Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456)," April 14, 2016 (ML16105A459)
3. NRC E-mail "Request for Additional Information - Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456)," April 18, 2016 (ML16110A004)
4. NRC E-mail "Request for Additional Information re. Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456)," June 1, 2016 (ML16154A339)
5. Florida Power & Light Company letter L-2016-116, "Response to Request for Additional Information Regarding License Amendment Request 236, Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times- RITSTF Initiative 4b'," June 16, 2016 (ML16180A178)
6. Florida Power & Light Company letter L-2016-136, "Second Response to Request for Additional Information Regarding License Amendment Request 236, Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b'," August 11, 2016 (ML16243A104)

7. Florida Power & Light Company letter L-2017-006, “Supplement to License Amendment Request 236, Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, ‘Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b’,” February 9, 2017 (ML17060A249)
8. NRC E-mail “Request for Additional Information Re. Turkey Point TSTF-505 LAR 236 (CACs MF5455 and MF5456)” March 30, 2017
9. Florida Power & Light Company letter L 2017-063, “Response to Third Request for Additional Information Regarding License Amendment Request 236, Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, ‘Provide Risk-Informed Extended Completion Times –RITSTF Initiative 4b’,” April 27, 2017 (ML17117A618)
10. NRC E-mail “Request for Additional Information - Turkey Point 3 & 4 LAR-236 (CACs MF5455 & MF5456),” August 10, 2017 (ML17223A061)
11. Florida Power & Light Company letter 2017-168 “Response to Fourth Request for Additional Information Regarding License Amendment Request 236, Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, “Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b,” October 30, 2017
12. Florida Power & Light Company letter 2018-001, “Supplement to Response to Fourth Request for Additional Information Regarding License Amendment Request 236, Revision to the Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, ‘Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b’,” February 15, 2018 (ML18046A597)
13. NRC E-mail “Turkey Point Nuclear Generating Unit Nos. 3 and 4, Request for Additional Information Regarding License Amendment Request 256 (CAC Nos. MF5455 and MF5456; EPID L-2014-0002),” March 1, 2018

In Reference 1, as supplemented by References 5, 6, 7, 9, 11, and 12, Florida Power & Light Company (FPL) submitted license amendment request (LAR) 236 for Turkey Point Units 3 and 4. The proposed amendment would revise the Technical Specifications (TS) to implement TSTF-505, Revision 1, “Provide Risk-Informed Extended Completion Times RITSTF [Risk Informed TSTF] Initiative 4b.”

In Reference 13, the NRC staff requested additional information to support its review of the LAR. The enclosure to this letter provides FPL’s response to the request for additional information (RAI). The attachment to the enclosure provides a marked up TS page containing the revised proposed change. This page supersedes the corresponding page provided in Reference 7.

This response to the RAI does not alter the conclusions in Reference 1 that the change does not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the change.

No new or revised commitments are included in this letter.

Should you have any questions regarding this submittal, please contact Robert Hess, Licensing Manager, at (305) 246-4112.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 22, 2018

Sincerely,



Robert Coffey
Regional Vice President - Southern Region
Florida Power & Light Company

Enclosure

cc: NRC Regional Administrator, Region II
NRC Senior Resident Inspector
NRC Project Manager
Ms. Cindy Becker, Florida Department of Health

ENCLOSURE**Response to Request for Additional Information****Background**

The categories of items required to be in the TSs are provided in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c). As required by 10 CFR 50.36(c)(2)(i), the TSs will include limiting conditions for operation (LCOs), which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. Per 10 CFR 50.36(c)(2)(i), when an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs, until the condition can be met.

Within the context of the Risk-Informed Completion Time (RICT) program, a TS Loss of Function (TS LOF) is considered to exist when there is insufficient OPERABLE equipment to fulfill a safety function. Additional administrative controls are needed to address TS LOF conditions due to safety margin and defense-in-depth considerations.

Turkey Point TS LCO 3.7.1.5 requires that each main steam line isolation valve (MSIV) be operable in MODES 1, 2 and 3. The current ACTION statement applicable in Mode 1 requires, in part, that with one MSIV inoperable but open, power operation may continue provided the inoperable valve is restored to operable status within 24 hours.

The License Amendment Request proposes to apply a RICT for this configuration, which would allow the inoperable valve to remain inoperable and open for a maximum of 30 days.

STSB RAI-4 (ADAMS Accession No. ML17223A061) requested information on how the assumptions in the accident analysis would be satisfied when one MSIV is inoperable. FPL responded to this RAI in the October 30, 2017, letter. The response to STSB RAI-4 addresses the safety function of the MSIVs for only the steam line break accident, and does not discuss the safety function of the MSIVs in any other accident analysis.

Section 10.2.2 of the Turkey Point Updated Final Safety Analysis Report (UFSAR), Design Features - Main Steam Systems - Main Steam Isolation states that the Main Steam Isolation Valves provide safety related isolation capability for the steam generators for Main Steam Line Breaks (MSLBs) and Steam Generator Tube Ruptures (SGTRs).

UFSAR Section 14.2.4, Steam Generator Tube Rupture, states, in part, that the ruptured unit will be isolated by the steam line isolation valve once the reactor coolant pressure is reduced below the ruptured steam generator pressure.

STSB RAI-5 (Follow-up to STSB RAI-4)

Please explain the impact of an inoperable and open MSIV on the assumptions, accident progression and consequences of the Steam Generator Tube Rupture accident. Please provide

an explanation of why an inoperable and open MSIV would not represent a TS loss of function within this context.

Please provide a similar summary of the impact of an inoperable and open MSIV on any other affected accident analysis or transient.

FPL Response

FPL determined that the condition in which one main steam isolation valve (MSIV) is inoperable does not result in a loss of function with regard to a steam line break. However, the analysis of a steam generator tube rupture relies on closure of the MSIV to isolate the affected steam generator, and an inoperable MSIV could result in the inability to accomplish this safety function. Therefore, FPL is withdrawing the proposed change to apply a RICT to the Action for an inoperable MSIV in Mode 1.

ATTACHMENT

Markup of Technical Specification

(One page follows)

PLANT SYSTEMS

MAIN STEAM LINE ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.5 Each main steam line isolation valve (MSIV) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

MODE 1:

With one MSIV inoperable but open, POWER OPERATION may continue provided the inoperable valve is restored to OPERABLE status within 24 hours; otherwise be in ~~HOT STANDBY~~ within the next 6 hours and in ~~HOT SHUTDOWN~~ within the following 6 hours.

MODES 2 and 3:

~~With one MSIV inoperable, subsequent operation in MODE 2 or 3 may proceed provided the isolation valve is maintained closed. Otherwise, be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

MODE 2

SURVEILLANCE REQUIREMENTS

4.7.1.5 Each MSIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds when tested in accordance with the INSERVICE TESTING PROGRAM. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

With one or more MSIVs inoperable, subsequent operation in MODE 2 or 3 may continue provided:

1. The inoperable MSIVs are closed within 8 hours, and
2. The inoperable MSIVs are verified closed once per 7 days.

Otherwise, be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.