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KENNETH M. KASTNER
SCOTT SLAUGHTER
OF COUNSEL

NOT ADMITTED IN D.C.

Peter B. Bloch, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. George C. Anderson
450 Vista Chino, Apt. 2015
Palm Springs, CA 92262

Elizabeth B. Johnson
Oak Ridge National Laboratory
P.O. Box 2008
Bethel Valley Road, Bldg. 3500
Mail Stop 6010
Oak Ridge, TN 37831

Re: Florida Power & Light Co. (Turkey Point Plant, Unit
Nos. 3 and 4), Docket Nos. 50-250-OLA-5 and 50-251-
OLA-5 (Technical Specifications Replacement)

Dear Licensing Board Members:

Please find enclosed for your information, letter L-
90-20 dated February 13, 1990, from Florida Power & Light Company
(FPL) to the NRC. This letter relates to Attachment IV of FPL's
June 5, 1989, application for the Technical Specifications
Replacement Amendment. As you may be aware, Attachment IV
identified open licensing issues that were addressed by the
application. The attached letter provides additional information
regarding certain of those open issues to aid the NRC Staff in
their closeout of the issues.

Sincerely,

Steven P. Frantz
Steven P. Frantz
Co-Counsel for Florida
Power & Light Company

9003170106 900309
PDR ADOCK 05000250
Q PDR

cc: Service List

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

90 MAR 12 P5:19
OFFICE OF SECRETARY
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In the Matter of)

FLORIDA POWER & LIGHT COMPANY)

(Turkey Point Plant, Units 3
and 4))

Docket Nos. 50-250 OLA-5
50-251 OLA-5

(Technical Specifications
Replacement)

CERTIFICATE OF SERVICE

I hereby certify that copies of a letter dated March 9, 1990, from Steven P. Frantz to the Licensing Board Members in the above captioned proceeding were served on the following by deposit in the United States mail, first-class postage paid on the date shown below.

Peter B. Bloch, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. George C. Anderson
450 Vista Chino, Apt. 2015
Palm Springs, CA 92262

Elizabeth B. Johnson
Oak Ridge National Laboratory
P.O. Box 2008
Bethel Valley Road, Bldg. 3500
Mail Stop 6010
Oak Ridge, TN 37831

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

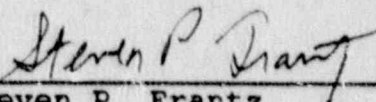
Attention: Chief Docketing and Service Section
(Original plus two copies)

Thomas J. Saporito, Jr.
Executive Director
Nuclear Energy Accountability Project
P.O. Box 129
Jupiter, Florida 33468-0129

Janice E. Moore, Esq.
Patricia A. Jehle, Esq.
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

John T. Butler
Steel, Hector & Davis
4000 Southeast Financial Center
Miami, Florida 33131

Dated this 9th day of March 1990.



Steven P. Frantz
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Suite 1000
Washington, D.C. 20036



FEB 13 1990

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

Gentlemen:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Revised Technical Specifications

RECEIVED
MAR 5 - 1990
Newman & Holtzinger, P.C.

By letter dated June 5, 1989 (FPL letter L-89-201), as supplemented November 3, 1989 (FPL letter L-89-329), Florida Power & Light Company (FPL) submitted a request to amend Appendix A of Facility Operating Licenses DPR-31 and DPR-41 to replace the current technical specifications with revised technical specifications based on the Standard Technical Specifications for Westinghouse Pressurized Water Reactors. The proposed revised technical specifications submitted were the result of extensive FPL and NRC staff review and comment following FPL's initial submittals in September and November of 1986.

Attachment IV of the June 5, 1989 submittal identified a number of open licensing issues that were addressed by the Technical Specification Upgrade Project and that could be closed as a result of the June 5, 1989 submittal.

The attachment to this letter provides additional information regarding certain of those open issues to aid in their closeout. This information is being provided in response to a request from Gordon E. Edison, Sr., the NRC Project Manager for the Turkey Point Plant.

Should you have any questions regarding the attached information, please contact us.

Very truly yours,

K. N. Harris
K. N. Harris
Vice President
Turkey Point Plant Nuclear

KNH/TCG/gp
Attachment

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cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant

ATTACHMENT

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Proposed License Amendment
Revised Technical Specifications

The following information supplements that provided in Attachment IV of FPL letter L-89-201 dated June 5, 1989 with respect to items 2, 4, 5, and 6 of that attachment:

2. Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," dated June 4, 1987 provided guidance addressing three specific problems that have been encountered with the general requirements of Sections 3.0 and 4.0 of the STS. These problems related to (1) unnecessary restrictions on mode changes, (2) unnecessary shutdown caused by inadvertent surpassing of surveillance intervals, and (3) conflicts between specifications 4.0.3 and 4.0.4 related to mode changes. The NRC staff had concluded that the modifications proposed in this generic letter would result in improved technical specifications (TS) for all plants. Licensees were encouraged to propose changes to their TS that are consistent with the guidance in the generic letter; however, the changes were voluntary for all licensees. FPL submitted proposed TS consistent with the guidance of Generic Letter 87-9 in FPL letter L-88-389 dated September 27, 1988. FPL letter L-89-201 dated June 5, 1989 stated that the proposed changes had been incorporated into the revised technical specifications, and that the September 27, 1988 submittal need not be reviewed as a separate item. Specific changes in response to Generic Letter 87-09, are included in TS 3.0/4.0 of FPL's June 5, 1989 submittal (pages 3/4 0-1 through 3/4 0-4) and the corresponding Bases.
4. Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability", dated July 2, 1984, requested that licensee 1) describe their current programs to avoid cold fast starts or their intended action to reduce the number of cold fast start surveillance tests from ambient conditions for diesel generators, 2) report the reliability of each diesel generator at their plant for its last 20 and 100 demands, and 3) describe their diesel generator reliability program, if any, for attaining and maintaining a reliability goal. Generic Letter 84-15 encouraged licensees to submit changes to their technical specifications to accomplish a reduction in the number of cold fast starts.

Licenseses were also requested to comment on and/or compare their existing program or any proposed program with the example performance specification included with the generic letters. Additional guidance was provided in the technical specifications issued by the NRC to Virginia Power's North Anna Power Station in April 1985. FPL responded to the three items concerning improving and maintaining diesel generator reliability in FPL letter L-84-316 dated November 6, 1984. Proposed TS changes to address the Generic Letter 84-15 concerns are included in TS 3.8.1.1 and 4.8.1.1 of FPL's June 5, 1989 submittal (pages 3/4 8-1 through 3/4 8-7) and the corresponding Bases.

5. The background for the containment purge and vent valve technical specifications is described in detail in FPL letter L-88-478 dated November 2, 1988, in FPL's comments on Specification 3/4.6.1.7. The specification commented on in that letter was further revised after subsequent review and comment by the FPL and the NRC staff. As a result of this review, the 1986 submittal which proposed a 200 hour limit on purging was modified to provide restrictions on the reason for which purging may be used in lieu of a limit on purging time. The specific changes to resolve the containment purge and vent valve technical specification issue are included in TS 3.6.1.7 and 4.6.1.7 of FPL's June 5, 1989 submittal (page 3/4 6-11).
6. Item 4.3 of Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events," established the requirement for the automatic actuation of the shunt trip attachment for Westinghouse Plants. Generic Letter 85-09, "Technical Specifications for Generic Letter 83-28, Item 4.3," dated May 23, 1985, requested that licensees submit proposed technical specification changes to explicitly require independent testing of the undervoltage and shunt trip attachments during power operation and independent testing of the control room manual switch contacts during each refueling outage. Specific changes in response to the Generic Letter 85-09 requirements are included in TS 3.3.1 and 4.3.1 (Tables 3.3-1 and 4.3-1) of FPL's June 5, 1989 submittal (pages 3/4 3-1 through 3/4 3-12).