April 27, 2017

L-2017-063

10 CFR 50.90

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

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

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"

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 MF54555 & 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

In Reference 1, as supplemented by References 5, 6, and 7, 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 8, 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).

Attachment 1 to the Enclosure provides a marked up TS page showing the revised proposed changes. This page supersedes the corresponding page provided in Reference 7. Attachment 2 to the Enclosure provides a retyped TS page and replaces the corresponding page included in Reference 7. A revised change to the TS Bases, which supersedes the corresponding pages in Reference 7, is provided in Attachment 3.

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

No new or revised commitments are included in this letter.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Licensing Manager, at (305) 246-6698.

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

Executed on April 27, 2017

Sincerely,

Thomas Summers
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

Response to Request for Additional Information (RAI)

EICB RAI 7

The licensee's supplement dated February 9, 2017, revised the licensee's application to exclude the use of the loss of function provisions in TSTF-505, Revision 1; however, the staff identified the remaining functions that appear to include a loss of function.

A. In its supplement dated February 9, 2017, the licensee proposed a new Action 27 in TS Table 3.3-2 that would allow a RICT for the condition when one required instrument channel is inoperable. The proposed Action 27 now states, "With one channel inoperable, restore the inoperable channel to OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program, or be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours." TS Table 3.3-2, Functional Unit 3.b.1 (i.e., the Containment Isolation, Phase "B" Isolation, Manual Initiation function) requires 2 channels to trip and states, "Both buttons must be pushed simultaneously to actuate." The licensee's proposed Action 27 for Functional Unit 3.b.1 is for one channel inoperable (i.e., when one of the two buttons is inoperable). Therefore, the staff requests the licensee to explain why this condition of the Manual Initiation function (i.e., one manual push button inoperable) is not considered a loss of function and justify why extended operation in this condition is acceptable.

B. In its supplement dated February 9, 2017, the licensee proposed a RICT in Action 18 in TS Table 3.3-2 for when the number of OPERABLE channels is one less than the total number of channels. Action 18 is applicable for Functional Unit 7, "Loss of Power," in TS Table 3.3-2. Functional Unit 7.a is for a loss of voltage on the 4.16 kilovolt Buses A and B, has two channels per bus, and requires two channels per bus to trip. The licensee's proposed RICT in Action 18 is for when one channel is inoperable. Therefore, the staff requests the licensee to explain why this condition (i.e., loss of one channel of loss of power indication) of Functional Unit 7.a is not considered as a loss of function and justify why extended operation in this condition is acceptable.

FPL Response

A. The condition involving one inoperable manual pushbutton results in the inability to manually actuate containment phase B isolation. Therefore, FPL is withdrawing the proposed change to the Action for Functional Unit 3.b.1, "Containment Isolation - Phase "B" Isolation - Manual Initiation," in TS Table 3.3-2. This change eliminates TS page 3/4 3-16 from Attachments 2 and 3 in Reference 7.

B. Functional Unit 7, Loss of Power, in Table 3.3-2 detects loss of voltage, undervoltage, and degraded voltage using a two-out-of two logic. Loss of one channel results in the inability to initiate a loss of power signal; therefore, FPL is withdrawing the proposed change to Action 18 associated with Functional Unit 7. Attachment 1 contains a revised mark-up of the TS page and Attachment 2 provides the retyped TS page. The revised Bases change is included in Attachment 3.

ATTACHMENT 1

Mark-up of the Technical Specification

(One page follows)

TABLE 3.3-2 (Continued)

TABLE NOTATION (Continued)

ACTION 18 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 6 hours. Both channels of any one load center may be taken out of service for up to 8 hours in order to perform surveillance testing per Specification 4.3.2.1.

ACTION 19 - With less than the Minimum Number of Channels OPERABLE, within 1 hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition, or apply Specification 3.0.3.

ACTION 20 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 8 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

ACTION 21 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or declare the associated valve inoperable and take the ACTION required by Specification 3.7.1.5.

ACTION 22 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 8 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

ACTION 23 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, comply with Specification 3.0.3.

ACTION 24 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, within 1 hour isolate the ~~control room~~ Control Room Emergency Ventilation System and initiate operation of the Control Room Emergency Ventilation System in the recirculation mode.

ACTION 25 - With number of OPERABLE channels one less than the Total number of channels, STARTUP and/or POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 6 hours. For subsequent required DIGITAL CHANNEL OPERATIONAL TESTS the inoperable channel may be placed in bypass status for up to 4 hours or in accordance with the Risk Informed Completion Time Program.

ACTION 26 - With one channel inoperable, operation may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST or TRIP ACTUATING DEVICE OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 6 hours or in accordance with the Risk Informed Completion Time Program.

ACTION 27- With one channel inoperable, restore the inoperable channel to OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program, or be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

ATTACHMENT 2

Retyped Technical Specification Page

(One page follows)

TABLE 3.3-2 (Continued)

TABLE NOTATION (Continued)

ACTION 18 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 6 hours. Both channels of any one load center may be taken out of service for up to 8 hours in order to perform surveillance testing per Specification 4.3.2.1.

ACTION 19 - With less than the Minimum Number of Channels OPERABLE, within 1 hour determine by observation of the associated permissive annunciator window(s) that the interlock is in its required state for the existing plant condition, or apply Specification 3.0.3.

ACTION 20 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in at least HOT SHUTDOWN within the following 6 hours; however, one channel may be bypassed for up to 8 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

ACTION 21 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or declare the associated valve inoperable and take the ACTION required by Specification 3.7.1.5.

ACTION 22 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 8 hours for surveillance testing per Specification 4.3.2.1 provided the other channel is OPERABLE.

ACTION 23 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, comply with Specification 3.0.3.

ACTION 24 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, within 1 hour isolate the Control Room Emergency Ventilation System and initiate operation of the Control Room Emergency Ventilation System in the recirculation mode.

ACTION 25 - With number of OPERABLE channels one less than the Total number of channels, STARTUP and/or POWER OPERATION may proceed provided the inoperable channel is placed in the tripped condition within 6 hours or in accordance with the Risk Informed Completion Time Program. For subsequent required DIGITAL CHANNEL OPERATIONAL TESTS the inoperable channel may be placed in bypass status for up to 4 hours.

ACTION 26 - With one channel inoperable, operation may proceed until performance of the next required ANALOG CHANNEL OPERATIONAL TEST or TRIP ACTUATING DEVICE OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 6 hours or in accordance with the Risk Informed Completion Time Program.

ACTION 27 - With one channel inoperable, restore the inoperable channel to OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program, or be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

ATTACHMENT 3

Change to the Technical Specification Bases

(Two pages follow)

INSERT BASES 1

Actions

Action 1	With one Manual Reactor Trip channel inoperable, the inoperable channel must be restored to OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program.
Action 10	With one of the reactor trip breakers (RTB) diverse trip features (undervoltage or shunt trip) inoperable, it must be restored to an OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program.
Acton 25	With one less than the total number of channels OPERABLE, the Action requires placing the inoperable channel in the tripped condition within 6 hours or in accordance with the Risk Informed Completion Time Program.
Action 26	With one channel inoperable, the Action requires placing the inoperable channel in the tripped condition within 6 hours or in accordance with the Risk Informed Completion Time Program.
Acton 27	With one channel of Manual Initiation inoperable, the Action requires restoring the inoperable channel to OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program.

ATTACHMENT 2
Technical Specification Bases
(Page 59 of 194)

3/4.3.1 & 3/4.3.2 (Continued)

The Engineered Safety Features Actuation System interlocks perform the following functions:

- HIGH STEAM FLOW SAFETY INJECTION BLOCK - This permissive is used to block the safety injection (SI) signal generated by High Steam Line Flow coincident with Low Steam Line Pressure or Low Tavg. The permissive is generated when two out of three Low Tavg channels drop below their setpoints and the manual SI Block/Unblock switch is momentarily placed in the block position. This switch is a spring return to the normal position type. The permissive will automatically be defeated if two out of three Low Tavg channels rise above their setpoints. The permissive may be manually defeated when two out of three Low Tavg channels are below their setpoints and the manual SI Block/Unblock switch is momentarily placed in the unblock position.

- LOW PRESSURIZER PRESSURE SAFETY INJECTION BLOCK - This permissive is used to block the safety injection signals generated by Low Pressurizer Pressure and High Differential Pressure between the Steam Line Header and any Steam Line. The permissive is generated when two out of three pressurizer pressure permissive channels drop below their setpoints and the manual SI Block/Unblock switch is momentarily placed in the block position. This is the same switch that is used to manually block the High Steam Flow Safety Injection signals mentioned above. This permissive will automatically be defeated if two out of three pressurizer pressure permissive channels rise above their setpoints. The permissive may be manually defeated when two out of three pressurizer pressure permissive channels are below their setpoints and the manual SI Block/Unblock switch momentarily placed in the Unblock position.

INSERT BASES 1 →