operation and surveillance of the Incore Instrumentation (ICI) System will be relocated from the Technical Specifications to the Updated Final Safety Analysis Report for St. Lucie Unit 1 and Unit 2. Changes to the system will be controlled by 10 CFR 50.59, and the safety analysis report is required to be updated pursuant to 10 CFR 50.71(e). Relocation of these requirements to the UFSAR is consistent with the NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" 90132) dated July 22, 1993.

Incore instrumentation is not an accident initiator nor a part of the success path(s) which function to mitigate accidents evaluated in the plant safety analyses. The proposed technical specification change does not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do the changes alter any assumptions or conditions in any of the plant accident analyses. Therefore, 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.

(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 accident previously evaluated.

The proposed amendment to relocate the existing Technical Specification requirements for the Incore Instrumentation System to the Updated Final Safety Analysis Report will not change the physical plant or the modes of plant operation defined in the Facility License. The change does not involve the addition or modification of equipment nor does it alter the design or operation of plant systems. Therefore, 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 accident 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 changes are administrative in nature in that operating and surveillance requirements for the Incore Instrumentation System will be relocated from the Technical Specifications to the Updated Final Safety Analysis Report for St. Lucie Unit 1 and Unit 2. The ICI system is not used to actuate safety-related equipment, provide interlocks, or otherwise perform automatic plant control functions. The system is used to monitor core power distribution parameters whose limits do involve a margin of safety; however, the ICI system itself makes no contribution to that margin of safety, and the power distribution limits will not be changed by the proposed amendment. Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the above discussion and the supporting Evaluation of Technical Specification changes, FPL has determined that the proposed license amendment involves no significant hazards consideration.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: Indian River Junior College Library, 3209 Virginia Avenue, Fort Pierce, Florida 34954–9003.

*Attorney for licensee:* Harold F. Reis, Esquire, Newman and Holtzinger, 1615 L Street, NW., Washington, DC 20036.

NRC Project Director: David B. Matthews.

Florida Power and Light Company, Docket Nos. 50–250 and 50–251, Turkey Point Plant Units 3 and 4, Dade County, Florida

Date of amendment request: January 17, 1995.

Description of amendment request: The licensee proposes to revise the technical specifications to reference Topical Report NF-TR-95-01 as the documentation of the licensee's proficiency in performing certain reload design calculations once the NRC has evaluated and approved NR-TR-95-01.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

(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 addition of the reference to FPL [Florida Power and Light Company] topical report which demonstrates FPL's ability to perform certain reload design calculations for Turkey Point Units 3 and 4 is administrative in nature and has no impact on the probability or consequences of any Design Bases Event (DBE) occurrences previously evaluated. The reload design calculations will be performed using methodologies and computer codes approved by the NRC and poses no increase in the probability or consequences of any accident previously evaluated.

The Core Operating Limits Report (COLR) parameters will be evaluated every cycle to ensure proper compliance with the Updated Final Safety Analysis Report (UFSAR). These limits will be evaluated in accordance with 10 CFR [Section] 50.59, which ensures that the reload will not involve an increase in the probability of occurrences or consequences of an accident previously evaluated. Title 10 CFR [Section] 50.59 (2) states that a proposed change involves an unreviewed safety

question (i) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased. Consequently, since any change to the reload core design analysis must be evaluated relative to the more restrictive evaluation criterion of 10 CFR [Section] 50.59, then 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.

(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 addition of the reference to FPL topical report which demonstrates FPL's ability to perform certain reload design calculations for Turkey Point Units 3 and 4 is administrative in nature and has no impact, nor does it contribute in any way to the possibility of a new or different kind of accident from any accident previously evaluated. No new accident scenarios, failure mechanisms or limiting single failure events are introduced as a result of the proposed change.

The generation of the Axial Flux Difference, Rod Bank Insertion limits and K(Z) curve will be performed using NRCapproved methodology and are submitted to the NRC, as a revision to the COLR, to allow the NRC staff to trend. The Technical Specifications will continue to require operation within the core operating limits and appropriate actions will be taken if these limits are exceeded.

Title 10 CFR [Section] 50.59 permits a licensee to make changes in the facility as described in the safety analysis report without prior Commission approval, provided that the proposed changes does not involve an unreviewed safety question. 10 CFR [Section] 50.59 (2) states that a proposed change involves an unreviewed safety question (ii) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created. Consequently, since any change to the reload core design analysis must be evaluated relative to the more restrictive evaluation criterion of 10 CFR [Section] 50.59, then 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.

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

The margin of safety is not affected by FPL performing the reload design calculations for Turkey Point Units 3 and 4. The supporting Technical Specification values are defined by the accident analyses which are performed to conservatively bound the operating conditions defined by the Technical Specifications. The development of the limits for future reloads will continue to conform to the methodology described in NRC approved documentation. In addition, each future reload will involve a 10 CFR [Section] 50.59