

May 4, 2000

Mr. Thomas F. Plunkett
President - Nuclear Division
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL
INFORMATION REGARDING THE MAIN STEAM AND PRESSURIZER CODE
SAFETY VALVE SETPOINT SETTING (TAC NOS. MA8109 AND MA8110)

Dear Mr. Plunkett:

By letter dated January 19, 2000, Florida Power and Light Company (FPL) submitted proposed license amendments that would revise the St. Lucie Technical Specifications (TS) for the above valves. The proposed TS is consistent with the Standard TS requirements that allow an expanded as-found acceptance tolerance. The NRC staff has reviewed FPL's submittal and has determined that additional information is needed before it can complete its review. The enclosed request for additional information (RAI) has been discussed with George Madden of your staff. A target date for your response has been agreed upon to be 60 days from your receipt of this RAI. Should a situation occur that prevents you from meeting the target date, please contact me at (301) 415-1496.

Sincerely,

/RA/

Kahtan N. Jabbour, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING THE MAIN STEAM AND PRESSURIZER CODE
SAFETY VALVE SETPOINT SETTING
ST. LUCIE UNITS 1 AND 2
FLORIDA POWER AND LIGHT COMPANY
DOCKET NOS. 50-335 AND 50-389

1. The licensee's submittal dated January 19, 2000, states that the proposed technical specification (TS) changes are consistent with the approved Standard Technical Specifications (STS). However, the proposed changes to Limiting Condition for Operation (LCO) 3.4.3, LCO 3.7.1.1, and Table 4.7-1 for Unit 1, and to LCO 2.4.2.2, LCO 3.7.1.1, and Table 3.7-2 for Unit 2, are not consistent with the STS. The proposal would remove the valve lift settings required for the valves to be OPERABLE during Modes 1, 2, and 3 (as demonstrated by the as-found settings during surveillance) and replaces them with the as-left settings. The STS places the as-left +/-1% resetting tolerance in the Surveillance Requirements for the valves, not in the LCO, and places the as-found tolerance in the LCO as a limit of acceptable setpoint drift during plant operation. The purpose of the LCO is to indicate how much the settings can change during operation and remain OPERABLE, not the as-left setting prior to operation. Therefore, please address whether your proposed TS change should be revised to be consistent with the STS.
2. Uncertainties of analysis parameters should be accounted for in the safety analyses used to justify new limits in the plant TS. Provide a discussion of the pressurizer safety valve (PSV) and main steam safety valve (MSSV) setpoint testing instrument accuracy and how this source of uncertainty is accounted for in the licensee's safety analysis associated with the proposed TS PSV and MSSV setpoint tolerances.
3. As documented in NRC Integrated Inspection Report 50-335/98-12 and 50-389/98-12, the licensee's Generic Letter 96-05 program establishes a goal of 10% margin to account for age-related degradation of motor-operated valve (MOV) performance. However, changes to the differential pressure loads on valves, which result from the proposed TS amendment, are not age-related degradation, but are changes to the design basis for the valves. The inspection report also found that, at that time, the licensee was maintaining an up-to-date design basis for GL 96-05 valves. Provide verification that the functional capability of all safety-related power-operated (motor-operated, air-operated, and hydraulically-operated) valves has been evaluated for the larger differential pressure loads resulting from the increased TS PSV and MSSV setpoint tolerances.

Enclosure

4. Provide the results of your reanalyses for the transients and accidents (including but not limiting to the loss of external load and small break LOCA) that are affected by the proposed changes of PSV and MSSV set point tolerances for Units 1 and 2. The information provided should include the following:

a. Major assumptions used in these analyses (especially, those that are different from the analyses of record and affected by the proposed TS changes).

b. the peak clad temperature following a small break LOCA and the peak RCS pressure following the limiting case for each event category from your reanalyses and the comparative values from the analyses of record, and

c. the amount of dose release following a steam generator tube rupture from the reanalyses and its comparison with your analyses of record.

5. Discuss the methodology used for reanalyses of each event and confirm the consistency between the methodologies used in the reanalyses and the original licensing analyses. Identify any differences in methodology and provide justification.

6. TS 3.7.1.1 requires returning the plant to hot shutdown within 12 hours. Please provide the basis for the 12 hours.

7. Pages 4 and 9 of Attachment 1 to the licensee's letter of January 19, 2000, discuss the TS changes related to PSV LCO reformatting for Units 1 and 2.

At the end of page 9, it states that "The proposed changes to Unit 2 TS are similar to those described above for Unit 1 and are provided in Attachment 4. The only significant difference between the units is the temperature for which LTOP is required - 230 °F for Unit 2"

However, the applicability of TS 3.4.3 for Unit 1 (page 4 of Attachment 3) was changed from "MODES 1, 2 and 3." to "MODES 1, 2, 3 and 4 with all RCS cold leg temperatures >281 °F." The corresponding Unit 2 applicability (TS 3.4.2.2 (page 4 of Attachment 4)) remains unchanged. Please clarify this inconsistency.

Mr. T. F. Plunkett
Florida Power and Light Company

ST. LUCIE PLANT

cc:

Senior Resident Inspector
St. Lucie Plant
U.S. Nuclear Regulatory Commission
P.O. Box 6090
Jensen Beach, Florida 34957

Joe Myers, Director
Division of Emergency
Preparedness
Department of Community Affairs
2740 Centerview Drive
Tallahassee, Florida 32399-2100

M. S. Ross, Attorney
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. Douglas Anderson
County Administrator
St. Lucie County
2300 Virginia Avenue
Fort Pierce, Florida 34982

Mr. William A. Passetti, Chief
Department of Health
Bureau of Radiation Control
2020 Capital Circle, SE, Bin #C21
Tallahassee, Florida 32399-1741

Mr. Rajiv S. Kundalkar
Vice President
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

Mr. R. G. West
Plant General Manager
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

E. J. Weinkam
Licensing Manager
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

Mr. John Gianfrancesco
Manager, Administrative Support
and Special Projects
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. J. A. Stall
Vice President - Nuclear Engineering
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. J. Kammel
Radiological Emergency
Planning Administrator
Department of Public Safety
6000 SE. Tower Drive
Stuart, Florida 34997