



July 26, 2000

L-2000-160
10 CFR 50.36
10 CFR 50.90

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

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Removal of Technical Specifications BASES
From Technical Specifications Index

In accordance with 10 CFR 50.90, Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating Licenses DPR-67 and NPF-16 be amended to modify the St. Lucie Units 1 and 2 Technical Specifications (TS), respectively. The purpose of these amendments is to revise the TS Index to delete reference to the BASES since, in accordance with 10 CFR 50.36(a), the BASES are not a part of the TS required by 10 CFR 50.36. Future changes to the TS BASES will be evaluated per 10 CFR 50.59 and made under administrative controls and reviews and in accordance with the proposed Technical Specifications (TS) Bases Control Program. These programmatic controls are identical to TS 5.5.14 of NUREG-1432, Revision 1, "Standard Technical Specifications Combustion Engineering Plants."

A description of the amendment requests is provided in Attachment 1. FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR 50.92. The no significant hazards determination in support of the proposed Technical Specifications changes is provided in Attachment 2. Attachment 3 provides the proposed revised Technical Specifications for St. Lucie Unit 1; Attachment 4 provides the proposed revised Technical Specifications for St. Lucie Unit 2.

In accordance with 10 CFR 50.91(b)(1), a copy of these proposed license amendments is being forwarded to the State Designee for the State of Florida.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed license amendments. If approved, FPL requests that the amendments be effective on date of issuance and are to be implemented within 60 days of receipt by FPL.

Should there be any questions on this request, please contact us.

A001

L-2000-160

Page 2

Very truly yours,

A handwritten signature in black ink, appearing to read "Rajiv S. Kundalkar". The signature is fluid and cursive, with the first name "Rajiv" being the most prominent.

Rajiv S. Kundalkar

Vice President

St. Lucie Plant

RSK/EJW

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant
W. A. Passetti, Florida Department of Health and Rehabilitative Service

ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUESTS

Description and Purpose

The proposed amendments revise the St. Lucie Units 1 and 2 Technical Specifications (TS) by removing the reference to the TS BASES from the TS Index since, in accordance with 10 CFR 50.36(a), the BASES are not a part of the TS required by 10 CFR 50.36. Changes to the TS BASES will be made under administrative controls and reviews after evaluation in accordance with 10 CFR 50.59. These proposed changes would permit Florida Power & Light Company (FPL) to improve the usability of the TS BASES. The TS BASES will be maintained in a licensee-controlled document.

Background

Title 10 CFR 50.36, **Technical specifications**, addresses the categories of technical specifications to be included in each facility's operating license. Title 10 CFR 50.36(a) states, "[a] summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications." Pursuant to 10 CFR 50.36(a), FPL proposes that the Index of the St. Lucie Units 1 and 2 TS be revised to delete reference to the BASES.

Discussion and Description of Proposed Changes

The following changes in plant TS, shown in Attachments 3 and 4, are proposed:

1. **DELETE** reference to BASES section of Index for Section 2, Safety Limits and Limiting Safety System Settings on Index page iii.
2. **DELETE** Index pages that contain Section 3/4 BASES documentation.

3. **ADD** a new program in the Section 6 Administrative Controls section of the Technical Specifications entitled Technical Specifications (TS) Bases Control Program to read as follows (in bold):

j. **Technical Specifications (TS) Bases Control Program**

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. **Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.**
- b. **Changes may be made to Bases without prior NRC approval provided the changes do not involve either of the following:**

A change in the TS incorporated in the license; or

A change to the updated UFSAR or Bases that cannot be made under a safety evaluation in accordance with 10 CFR 50.59.

- c. **The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.**
- d. **Proposed changes that meet the criteria of Specification 6.8.4.j.b., above, shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).**

Justification: Title 10 CFR 50.36(a) states, "[a] summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications." Pursuant to 10 CFR 50.36(a), FPL proposes that the Index of the St. Lucie Units 1 and 2 TS be revised to delete reference to the BASES. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR 50.59. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. No physical modifications to the facility are required to implement these proposed amendments. The addition of the Administrative Technical Specification stating the characteristics of the TS Bases Control Program will ensure that changes to the Bases are made under strict programmatic controls. These programmatic

controls are identical to TS 5.5.14 of NUREG-1432, Revision 1, "Standard Technical Specifications Combustion Engineering Plants."

4. Index Page XV, TS Section 6.9 REPORTING REQUIREMENTS, and TS Section 6.9.1 ROUTINE REPORTS:

Administrative conforming changes due to the text insertion for the TS Bases Control Program. These result in moving TS Section 6.9, REPORTING REQUIREMENTS, and TS Section 6.9.1, ROUTINE REPORTS, to a new TS page 6.15d. Since these Sections appear in the index a conforming change is required for the index.

10 CFR 50.36 Applicability

On July 17, 1995 (60 FR 36953), the Nuclear Regulatory Commission (NRC) amended its regulations pertaining to TS for nuclear power reactors. The rule codifies criteria for determining the content of TS. Licensees may voluntarily use the criteria as bases to propose the relocation of existing TS that do not meet any of the rule's criteria from the facility license to licensee-controlled documents. The rule's set of objective criteria for determining which regulatory requirements and operating restrictions should be included in TS are addressed below as related to the proposed amendments.

(A) *Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

Criterion 1 Analysis

All instrumentation required by current TS will continue to be addressed and required by the St. Lucie Units 1 and 2 TS. The proposed changes will revise the St. Lucie Units 1 and 2 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR 50.59. These amendments do not propose changes to the TS affecting instruments specifically installed to detect excessive reactor coolant system leakage or instrumentation installed to detect significant abnormal degradation of the reactor coolant pressure boundary.

(B) *Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 2 Analysis

Process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation, will continue to be maintained as currently included in the St. Lucie TS. Additionally, active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (pressure/temperature limits) needed to preclude unanalyzed accidents and transients, and as currently included in the TS, are not affected by these amendments. The amendments will revise the St. Lucie Units 1 and 2 TS to remove the reference to the TS BASES from the TS Index. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR 50.59.

The TS BASES will be controlled by a plant procedure using administrative guidelines and controls.

- (C) *Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 3 Analysis

Structures, systems, and components that are part of the primary success path of the safety sequence analysis, as well as those support and actuation systems that are necessary for items in the primary success path to successfully function, are unaffected by these amendments. The amendments will revise the St. Lucie Units 1 and 2 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR 50.59.

- (D) *Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.*

Criterion 4 Analysis

The St. Lucie TS which address systems for which operating experience and probabilistic safety assessment have generally shown to be significant to public health and safety and any other structures, systems, or components that meet this criterion are not impacted by the proposed license amendments. The amendments will revise the St. Lucie Units 1 and 2 TS to remove the reference to the TS BASES from the TS Index. The TS BASES will be controlled by a plant procedure using administrative guidelines and controls. Proposed changes to the TS BASES will be evaluated in accordance with 10

CFR 50.59.

Summary

The proposed revisions to St. Lucie Units 1 and 2 TS are administrative in nature. Since, per 10 CFR 50.36(a), the BASES are not a part of the TS required by 10 CFR 50.36, reference to the BASES may be removed from the TS Index. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR 50.59 and will be made in accordance with the proposed Technical Specifications (TS) Bases Control Program. These programmatic controls are identical to TS 5.5.14 of NUREG-1432, Revision 1, "Standard Technical Specifications Combustion Engineering Plants."

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of Proposed License Amendments

The proposed amendments revise the St. Lucie Units 1 and 2 Technical Specifications (TS) to remove the reference to the TS BASES from the TS Index since, in accordance with 10 CFR 50.36(a), the BASES are not a part of the TS required by 10 CFR 50.36. Changes to the TS BASES will be evaluated per 10 CFR 50.59 and made under administrative controls and reviews and in accordance with the proposed Technical Specifications (TS) Bases Control Program. The TS BASES will be maintained in an FPL-controlled document. These changes do not affect plant design or the modes of plant operation. The proposed revisions to St. Lucie Units 1 and 2 TS are administrative in nature. These programmatic controls are identical to TS 5.5.14 of NUREG-1432, Revision 1, "Standard Technical Specifications Combustion Engineering Plants." These proposed changes would permit Florida Power & Light Company (FPL) to improve the usability of the TS BASES.

Introduction

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92 (c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed below for the proposed amendments.

Discussion

- (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 proposed amendments are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. The Technical Specification BASES, per 10 CFR 50.36(a), are not a part of the Technical Specifications. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews. Proposed changes to the TS

BASES will be evaluated in accordance with 10 CFR 50.59 and made under the programmatic controls and requirements of the proposed Technical Specifications (TS) Bases Control Program. Therefore, the proposed changes do not increase the probability or consequences of accidents previously analyzed.

- (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 proposed amendments are administrative in nature. The proposed amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated since the proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. No new failure mode is introduced due to the administrative change, since the proposed change does not involve the addition or modification of equipment nor does it alter the design or operation of affected plant systems, structures, or components.

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

The operating limits and functional capabilities of the affected systems, structures, and components are unchanged by the proposed amendments. The BASES information, per 10 CFR 50.36(a), is not a part of the Technical Specifications. Changes to the TS BASES will be controlled by a plant procedure under administrative controls and reviews and made under the programmatic controls and requirements of the proposed Technical Specifications (TS) Bases Control Program. Proposed changes to the TS BASES will be evaluated in accordance with 10 CFR 50.59 and the TS BASES will be maintained in an FPL-controlled document. Therefore, the proposed changes do not reduce any margin of safety.

Summary

Based on the above discussion, FPL has determined that the proposed amendments do not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.

Environmental Consideration

The proposed license amendments do not change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The proposed amendments are administrative in nature and involve no increase in the amounts and no change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendments involve no significant hazards consideration and meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9); and that, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

ATTACHMENT 3

**PROPOSED LICENSE AMENDMENTS FOR
REMOVAL OF TECHNICAL SPECIFICATIONS BASES
FROM TECHNICAL SPECIFICATIONS INDEX**

PROPOSED REVISED TECHNICAL SPECIFICATIONS PAGES

St. Lucie Unit 1 Technical Specifications

II

IX

X

XI

XII

XV

6-15c

Insert for page 6-15c

INDEX

SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

<u>SECTION</u>	<u>PAGE</u>
<u>2.1 SAFETY LIMITS</u>	
Reactor Core	2-1
Reactor Coolant System Pressure	2-1
<u>2.2 LIMITING SAFETY SYSTEM SETTINGS</u>	
Reactor Trip Setpoints	2-3

BASES

<u>SECTION</u>	<u>PAGE</u>
<u>2.1 SAFETY LIMITS</u>	
Reactor Core	B 2-1
Reactor Coolant System Pressure	B 2-3
<u>2.2 LIMITING SAFETY SYSTEM SETTINGS</u>	
Reactor Trip Setpoints	B 2-4

Delete

INDEX

<u>BASES</u>	
<u>SECTION</u>	<u>PAGE</u>
<u>3/4.0 APPLICABILITY</u>	B 3/4 0-1
<u>3/4.1 REACTIVITY CONTROL SYSTEMS</u>	
3/4.1.1 BORATION CONTROL	B 3/4 1-1
3/4.1.2 BORATION SYSTEMS	B 3/4 1-2
3/4.1.3 MOVABLE CONTROL ASSEMBLIES	B 3/4 1-3
<u>3/4.2 POWER DISTRIBUTION LIMITS</u>	
3/4.2.1 LINEAR HEAT RATE	B 3/4 2-1
3/4.2.2 DELETED	B 3/4 2-1
3/4.2.3 TOTAL INTEGRATED RADIAL PEAKING FACTOR - F_r^T	B 3/4 2-1
3/4.2.4 AZIMUTHAL POWER TILT	B 3/4 2-1
3/4.2.5 DNB PARAMETERS	B 3/4 2-2
<u>3/4.3 INSTRUMENTATION</u>	
3/4.3.1 and 3/4.3.2 PROTECTIVE AND ENGINEERED SAFETY FEATURES INSTRUMENTATION	B 3/4 3-1
3/4.3.3 MONITORING INSTRUMENTATION	B 3/4 3-1

Delete

INDEX

Delete

BASES	SECTION	PAGE
	<u>3/4.4 REACTOR COOLANT SYSTEM</u>	
	3/4.4.1 REACTOR COOLANT LOOPS AND COOLANT CIRCULATION.....	B 3/4 4-1
	3/4.4.2 and 3/4.4.3 SAFETY VALVES.....	B 3/4 4-1
	3/4.4.4 PRESSURIZER.....	B 3/4 4-2
	3/4.4.5 STEAM GENERATORS.....	B 3/4 4-2
	3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE.....	B 3/4 4-4
	3/4.4.7 CHEMISTRY.....	B 3/4 4-4
	3/4.4.8 SPECIFIC ACTIVITY.....	B 3/4 4-5
	3/4.4.9 PRESSURE/TEMPERATURE LIMITS.....	B 3/4 4-6
	3/4.4.10 STRUCTURAL INTEGRITY.....	B 3/4 4-12
	3/4.4.11 DELETED.....	B 3/4 4-13
	3/4.4.12 PORV BLOCK VALVES.....	B 3/4 4-14
	3/4.4.13 POWER OPERATED RELIEF VALVES and 3/4.4.14 REACTOR COOLANT PUMP - STARTING.....	B 3/4 4-15
	3/4.4.15 REACTOR COOLANT SYSTEM VENTS.....	B 3/4 4-15
	<u>3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)</u>	
	3/4.5.1 SAFETY INJECTION TANKS.....	B 3/4 5-1
	3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS.....	B 3/4 5-1
	3/4.5.4 REFUELING WATER TANK (RWT).....	B 3/4 5-2
	<u>3/4.6 CONTAINMENT SYSTEMS</u>	
	3/4.6.1 CONTAINMENT VESSEL.....	B 3/4 6-1
	3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS.....	B 3/4 6-2
	3/4.6.3 CONTAINMENT ISOLATION VALVES.....	B 3/4 6-3
	3/4.6.4 COMBUSTIBLE GAS CONTROL.....	B 3/4 6-3
	3/4.6.5 VACUUM RELIEF VALVES.....	B 3/4 6-4
	3/4.6.6 SECONDARY CONTAINMENT.....	B 3/4 6-4

INDEX

Delete

BASES

SECTION	PAGE
<u>3/4.7 PLANT SYSTEMS</u>	
3/4.7.1 TURBINE CYCLE	B 3/4 7-1
3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION	B 3/4 7-3
3/4.7.3 COMPONENT COOLING WATER SYSTEM	B 3/4 7-4
3/4.7.4 INTAKE COOLING WATER SYSTEM	B 3/4 7-4
3/4.7.5 ULTIMATE HEAT SINK	B 3/4 7-4
3/4.7.6 DELETED	
3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM	B 3/4 7-4
3/4.7.8 ECCS AREA VENTILATION SYSTEM	B 3/4 7-5
3/4.7.9 SEALED SOURCE CONTAMINATION	B 3/4 7-5
3/4.7.10 SNUBBERS	B 3/4 7-5
<u>3/4.8 ELECTRICAL POWER SYSTEMS</u>	B 3/4 8-1
<u>3/4.9 REFUELING OPERATIONS</u>	
3/4.9.1 BORON CONCENTRATION	B 3/4 9-1
3/4.9.2 INSTRUMENTATION	B 3/4 9-1
3/4.9.3 DECAY TIME	B 3/4 9-1
3/4.9.4 CONTAINMENT PENETRATIONS	B 3/4 9-1
3/4.9.5 COMMUNICATIONS	B 3/4 9-1
3/4.9.6 MANIPULATOR CRANE OPERABILITY	B 3/4 9-1
3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE BUILDING	B 3/4 9-2
3/4.9.8 SHUTDOWN COOLING AND COOLANT CIRCULATION	B 3/4 9-2

INDEX

Delete

<u>BASES</u>	
<u>SECTION</u>	<u>PAGE</u>
3/4.9.9 CONTAINMENT ISOLATION SYSTEM	B 3/4 9-2
3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL AND STORAGE POOL WATER LEVEL	B 3/4 9-2
3/4.9.12 FUEL POOL VENTILATION SYSTEM - FUEL STORAGE	B 3/4 9-3
3/4.9.13 SPENT FUEL CASK CRANE	B 3/4 9-3
3/4.9.14 DECAY TIME - STORAGE POOL	B 3/4 9-3
<u>3/4.10 SPECIAL TEST EXCEPTIONS</u>	
3/4.10.1 SHUTDOWN MARGIN	B 3/4 10-1
3/4.10.2 GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS	B 3/4 10-1
3/4.10.3 DELETED	
3/4.10.4 DELETED	
3/4.10.5 CENTER CEA MISALIGNMENT	B 3/4 10-1
<u>3/4.11 RADIOACTIVE EFFLUENTS</u>	
3/4.11.1 DELETED	B 3/4 11-1
3/4.11.2.5 EXPLOSIVE GAS MIXTURE	B 3/4 11-4
3/4.11.2.6 GAS STORAGE TANKS	B 3/4 11-5

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.6 REPORTABLE EVENT ACTION</u>	6-12
<u>6.7 SAFETY LIMIT VIOLATION</u>	6-12
<u>6.8 PROCEDURES AND PROGRAMS</u>	6-13
<u>6.9 REPORTING REQUIREMENTS</u>	
6.9.1 ROUTINE REPORTS	6-15b 6-15d
Startup Report	6-15b 6-15d
Annual Reports	6-16
Monthly Operating Reports	6-16a
Annual Radioactive Effluent Release Report	6-17
Annual Radiological Environmental Operating Report	6-18
Core Operating Limits Report (COLR)	6-19
6.9.2 SPECIAL REPORTS	6-19a
<u>6.10 RECORD RETENTION</u>	6-20
<u>6.11 RADIATION PROTECTION PROGRAM</u>	6-21
<u>6.12 HIGH RADIATION AREA</u>	6-22
<u>6.13 PROCESS CONTROL PROGRAM</u>	6-23
<u>6.14 OFFSITE DOSE CALCULATION MANUAL</u>	6-23

ADMINISTRATIVE CONTROLS (continued)

The provisions of T.S. 4.0.2 do not apply to test frequencies in the Containment Leak Rate Testing Program.

The provisions of T.S. 4.0.3 are applicable to the Containment Leak Rate Testing Program.

i. Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2 and 3 components (pumps and valves). The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code* and applicable addenda as follows:

ASME Boiler and Pressure Vessel Code* and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice testing activities;
- c. The provisions of Specification 4.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code* shall be construed to supersede the requirements of any technical specification.

* Where ASME Boiler and Pressure Vessel Code is referenced it also refers to the applicable portions of ASME/ANSI OM-Code, "Operation and Maintenance of Nuclear Power Plants," with applicable addenda, to the extent it is referenced in the Code.

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6.9

REPORTING REQUIREMENTS

ROUTINE REPORTS

- 6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC.

STARTUP REPORT

- 6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

move to New page 6-15d

Insert for Page 6-15c

j. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Changes may be made to Bases without prior NRC approval provided the changes do not involve either of the following:
 - A change in the TS incorporated in the license; or
 - A change to the updated UFSAR or Bases that that cannot be made under a safety evaluation in accordance with 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 6.8.4.j.b., above, shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

ATTACHMENT 4

**PROPOSED LICENSE AMENDMENTS FOR
REMOVAL OF TECHNICAL SPECIFICATIONS BASES
FROM TECHNICAL SPECIFICATIONS INDEX**

PROPOSED REVISED TECHNICAL SPECIFICATIONS PAGES

St. Lucie Unit 2 Technical Specification

III

XI

XII

XIII

XIV

XV

XVI

XXI

XXII

XXV

6-15c

Insert for page 6-15c

INDEX

SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

<u>SECTION</u>	<u>PAGE</u>
<u>2.1 SAFETY LIMITS</u>	
2.1.1 REACTOR CORE.....	2-1
2.1.1.1 DNBR.....	2-1
2.1.1.2 PEAK LINEAR HEAT RATE.....	2-1
2.1.2 REACTOR COOLANT SYSTEM PRESSURE.....	2-1
<u>2.2 LIMITING SAFETY SYSTEM SETTINGS</u>	
2.2.1 REACTOR TRIP SETPOINTS.....	2-2

BASES

<u>SECTION</u>	<u>PAGE</u>
<u>2.1 SAFETY LIMITS</u>	
2.1.1 REACTOR CORE.....	B 2-1
2.1.2 REACTOR COOLANT SYSTEM PRESSURE.....	B 2-3
<u>2.2 LIMITING SAFETY SYSTEM SETTINGS</u>	
2.2.1 REACTOR TRIP SETPOINTS.....	B 2-3

Delete

INDEX

BASES

<u>SECTION</u>	<u>PAGE</u>
<u>3/4.0 APPLICABILITY</u>	B 3/4 0-1
<u>3/4.1 REACTIVITY CONTROL SYSTEMS</u>	
3/4.1.1 BORATION CONTROL.....	B 3/4 1-1
3/4.1.2 BORATION SYSTEMS.....	B 3/4 1-2
3/4.1.3 MOVABLE CONTROL ASSEMBLIES.....	B 3/4 1-3
<u>3/4.2 POWER DISTRIBUTION LIMITS</u>	
3/4.2.1 LINEAR HEAT RATE.....	B 3/4 2-1
3/4.2.2, 3/4.2.3, and 3/4.2.4 TOTAL PLANAR and INTEGRATED RADIAL PEAKING FACTORS AND AZIMUTHAL POWER TILT.....	B 3/4 2-1
3/4.2.5 DNB PARAMETERS.....	B 3/4 2-2
<u>3/4.3 INSTRUMENTATION</u>	
3/4.3.1 and 3/4.3.2 REACTOR PROTECTIVE and ENGINEERED SAFETY FEATURES ACTUATION SYSTEMS INSTRUMENTATION.....	B 3/4 3-1
3/4.3.3 MONITORING INSTRUMENTATION.....	B 3/4 3-1
3/4.3.4 TURBINE OVERSPEED PROTECTION.....	B 3/4 3-4

Delete

INDEX

BASES

<u>SECTION</u>	<u>PAGE</u>
<u>3/4.4 REACTOR COOLANT SYSTEM</u>	
3/4.4.1 REACTOR COOLANT LOOPS AND COOLANT CIRCULATION.....	B 3/4 4-1
3/4.4.2 SAFETY VALVES.....	B 3/4 4-1
3/4.4.3 PRESSURIZER.....	B 3/4 4-2
3/4.4.4 PORV BLOCK VALVES.....	B 3/4 4-3
3/4.4.5 STEAM GENERATORS.....	B 3/4 4-3
3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE.....	B 3/4 4-4
3/4.4.7 CHEMISTRY.....	B 3/4 4-5
3/4.4.8 SPECIFIC ACTIVITY.....	B 3/4 4-6
3/4.4.9 PRESSURE/TEMPERATURE LIMITS.....	B 3/4 4-8
3/4.4.10 REACTOR COOLANT SYSTEM VENTS.....	B 3/4 4-12
3/4.4.11 STRUCTURAL INTEGRITY.....	B 3/4 4-12
<u>3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)</u>	
3/4.5.1 SAFETY INJECTION TANKS.....	B 3/4 5-1
3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS.....	B 3/4 5-1
3/4.5.4 REFUELING WATER TANK.....	B 3/4 5-2

Delete

INDEX

BASES

CE - DUAL TYPE CONTAINMENT

SECTION

PAGE

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1	PRIMARY CONTAINMENT.....	B 3/4 6-1
3/4.6.2	DEPRESSURIZATION AND COOLING SYSTEMS.....	B 3/4 6-2
3/4.6.3	CONTAINMENT ISOLATION VALVES.....	B 3/4 6-4
3/4.6.4	COMBUSTIBLE GAS CONTROL.....	B 3/4 6-4
3/4.6.5	VACUUM RELIEF VALVES.....	B 3/4 6-4
3/4.6.6	SECONDARY CONTAINMENT.....	B 3/4 6-5

Delete

INDEX

~~BASES~~ *Delete*

<u>SECTION</u>	<u>PAGE</u>
<u>3/4.7 PLANT SYSTEMS</u>	
3/4.7.1 TURBINE CYCLE.....	B 3/4 7-1
3/4.7.2 STEAM GENERATOR PRESSURE/TEMPERATURE LIMITATION.....	B 3/4 7-4
3/4.7.3 COMPONENT COOLING WATER SYSTEM.....	B 3/4 7-4
3/4.7.4 INTAKE COOLING WATER SYSTEM.....	B 3/4 7-4
3/4.7.5 ULTIMATE HEAT SINK.....	B 3/4 7-5
3/4.7.6 FLOOD PROTECTION.....	B 3/4 7-5
3/4.7.7 CONTROL ROOM EMERGENCY AIR CLEANUP SYSTEM.....	B 3/4 7-5
3/4.7.8 ECCS AREA VENTILATION SYSTEM.....	B 3/4 7-5
3/4.7.9 SNUBBERS.....	B 3/4 7-6
3/4.7.10 SEALED SOURCE CONTAMINATION.....	B 3/4 7-7
<u>3/4.8 ELECTRICAL POWER SYSTEMS</u>	
3/4.8.1, 3/4.8.2 and 3/4.8.3 A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS.....	B 3/4 8-1
3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES.....	B 3/4 8-3
<u>3/4.9 REFUELING OPERATIONS</u>	
3/4.9.1 BORON CONCENTRATION.....	B 3/4 9-1
3/4.9.2 INSTRUMENTATION.....	B 3/4 9-1
3/4.9.3 DECAY TIME.....	B 3/4 9-1
3/4.9.4 CONTAINMENT BUILDING PENETRATIONS.....	B 3/4 9-1
3/4.9.5 COMMUNICATIONS.....	B 3/4 9-1

INDEX

Delete

BASES

<u>SECTION</u>	<u>PAGE</u>
3/4.9.6 MANIPULATOR CRANE.....	B 3/4 9-2
3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE POOL BUILDING.....	B 3/4 9-2
3/4.9.8 SHUTDOWN COOLING AND COOLANT CIRCULATION.....	B 3/4 9-2
3/4.9.9 CONTAINMENT ISOLATION SYSTEM.....	B 3/4 9-2
3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and SPENT FUEL STORAGE POOL.....	B 3/4 9-3
3/4.9.12 SPENT FUEL CASK CRANE.....	B 3/4 9-3
<u>3/4.10 SPECIAL TEST EXCEPTIONS</u>	
3/4.10.1 SHUTDOWN MARGIN.....	B 3/4 10-1
3/4.10.2 MODERATOR TEMPERATURE COEFFICIENT, GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS.....	B 3/4 10-1
3/4.10.3 REACTOR COOLANT LOOPS.....	B 3/4 10-1
3/4.10.4 CENTER CEA MISALIGNMENT.....	B 3/4 10-1
3/4.10.5 CEA INSERTION DURING ITC, MTC, AND POWER COEFFICIENT MEASUREMENTS.....	B 3/4 10-1

INDEX

BASES

SECTION

PAGE

3/4.11 RADIOACTIVE EFFLUENTS

3/4.11.2.5 EXPLOSIVE GAS MIXTURE

B 3/4 11-4

3/4.11.2.6 GAS STORAGE TANKS

B 3/4 11-5

Delete

INDEX

LIST OF FIGURES

<u>FIGURE</u>	<u>PAGE</u>
2.1-1 REACTOR CORE THERMAL MARGIN SAFETY LIMIT LINES FOUR REACTOR COOLANT PUMPS OPERATING	2-3
2.2-1 LOCAL POWER DENSITY - HIGH TRIP SETPOINT PART 1 (FRACTION OF RATED THERMAL POWER VERSUS QR ₁)	2-7
2.2-2 LOCAL POWER DENSITY - HIGH TRIP SETPOINT PART 2 (QR ₂ VERSUS Y ₁)	2-8
2.2-3 THERMAL MARGIN/LOW PRESSURE TRIP SETPOINT PART 1 (Y ₁ VERSUS A ₁)	2-9
2.2-4 THERMAL MARGIN/LOW PRESSURE TRIP SETPOINT PART 2 (FRACTION OF RATED THERMAL POWER VERSUS QR ₁)	2-10
B-2.1-1 AXIAL POWER DISTRIBUTION FOR THERMAL MARGIN SAFETY LIMITS	B-2-2 <i>delete</i>
3.1-1 MINIMUM BORIC ACID STORAGE TANK VOLUME AS A FUNCTION OF STORED BORIC ACID CONCENTRATION	3/4 1-15
3.1-1a DELETED	
3.1-2 DELETED	
3.2-1 DELETED	
3.2-2 DELETED	
3.2-3 DELETED	
4.2-1 DELETED	
3.2-4 DELETED	
3.4-1 DOSE EQUIVALENT I-131 PRIMARY COOLANT SPECIFIC ACTIVITY LIMITS VERSUS PERCENT OF RATED THERMAL POWER WITH THE PRIMARY COOLANT SPECIFIC ACTIVITY >1 µCi/GRAM DOSE EQUIVALENT I-131	3/4 4-28
3.4-2 REACTOR COOLANT SYSTEM PRESSURE TEMPERATURE LIMITATIONS FOR 15 EFPY, HEATUP AND CORE CRITICAL	3/4 4-31a

INDEX

LIST OF FIGURES (Continued)

<u>FIGURE</u>		<u>PAGE</u>
3.4-3	REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITATIONS FOR 15 EFPY, COOLDOWN AND INSERVICE TEST.....	3/4 4-31b
3.4-4	REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITATIONS FOR 15 EFPY, MAXIMUM ALLOWABLE COOLDOWN RATES.....	3/4 4-32
4.7-1	SAMPLING PLAN FOR SNUBBER FUNCTIONAL TEST.....	3/4 7-25
B 3/4.4-1	NIL-DUCTILITY TRANSITION TEMPERATURE INCREASE AS A FUNCTION OF FAST (>1 MeV) NEUTRON FLUENCE (550°F IRRADIATION) FOR REACTOR VESSEL BELTLINE MATERIALS....	B 3/4 4-10
5.1-1	SITE AREA MAP.....	5-2
5.6-1	INITIAL ENRICHMENT VS. BURNUP REQUIREMENTS FOR STORAGE OF FUEL ASSEMBLIES IN REGION II.....	5-4a
6.2-1	DELETED.....	6-3
6.2-2	DELETED.....	6-4

Delete

INDEX

LIST OF TABLES (Continued)

<u>TABLE</u>	<u>PAGE</u>
3.7-1 MAXIMUM ALLOWABLE LINEAR POWER LEVEL-HIGH TRIP SETPOINT WITH INOPERABLE STEAM LINE SAFETY VALVES DURING OPERATION WITH BOTH STEAM GENERATORS.....	3/4 7-2
3.7-2 STEAM LINE SAFETY VALVES PER LOOP.....	3/4 7-3
4.7-1 SECONDARY COOLANT SYSTEM SPECIFIC ACTIVITY SAMPLE AND ANALYSIS PROGRAM.....	3/4 7-8
4.7-2 SNUBBER VISUAL INSPECTION INTERVAL.....	3/4 7-22
3.7-3a DELETED.....	3/4 7-26
3.7-3b DELETED.....	3/4 7-27
3.7-4 DELETED	
3.7-5 DELETED	
4.8-1 DIESEL GENERATOR TEST SCHEDULE.....	3/4 8-8
4.8-2 BATTERY SURVEILLANCE REQUIREMENT.....	3/4 8-12
3.8-1 MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION BYPASS DEVICES.....	3/4 8-18
4.11-1 DELETED	
4.11-2 DELETED	
3.12-1 DELETED	
3.12-2 DELETED	
4.12-1 DELETED	
8-3/4-2-1 DELETED.....	8-3/4-2-3
8-3/4-4-1 REACTOR VESSEL TOUGHNESS.....	8-3/4-4-9
5.7-1 COMPONENT CYCLIC OR TRANSIENT LIMITS.....	5-5
6.2-1 MINIMUM SHIFT CREW COMPOSITION-TWO UNITS WITH TWO SEPARATE CONTROL ROOMS.....	6-5

Delete
Delete

ADMINISTRATIVE CONTROLS (continued)

Leakage rate acceptance criteria:

- a. Containment leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60 L_a$ for the Type B and C tests, $\leq 0.75 L_a$ for Type A tests, and $\leq 0.12 L_a$ for secondary containment bypass leakage paths.
- b. Air lock testing acceptance criteria are:
 - 1. Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - 2. For each door seal, leakage rate is $< 0.01 L_a$ when pressurized to $\geq P_a$.

The provisions of T.S. 4.0.2 do not apply to test frequencies in the Containment Leak Rate Testing Program.

The provisions of T.S. 4.0.3 are applicable to the Containment Leak Rate Testing Program.

i. Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2 and 3 components (pumps and valves). The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code* and applicable addenda as follows:

ASME Boiler and Pressure Vessel Code* and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice testing activities;
- c. The provisions of Specification 4.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code* shall be construed to supersede the requirements of any technical specification.

* Where ASME Boiler and Pressure Vessel Code is referenced it also refers to the applicable portions of ASME/ANSI OM-Code, "Operation and Maintenance of Nuclear Power Plants," with applicable addenda, to the extent it is referenced in the Code.

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j. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Changes may be made to Bases without prior NRC approval provided the changes do not involve either of the following:
 - A change in the TS incorporated in the license; or
 - A change to the updated UFSAR or Bases that that cannot be made under a safety evaluation in accordance with 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 6.8.4.j.b., above, shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).