

September 18, 2000

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

SUBJECT: ST. LUCIE UNITS 1 AND 2 - SUPPLEMENT TO NRC SAFETY EVALUATION
REGARDING AMENDMENT NOS. 164 AND 106 (TAC NOS. MA8603/MA8604)

Dear Mr. Plunkett:

By letter dated March 13, 2000, Florida Power and Light Company (FPL) informed us of inconsistencies in the information included in the Safety Evaluation (SE) for Amendments Nos. 164 and 106, dated February 15, 2000, for St. Lucie Units 1 and 2. We have reviewed the FPL comments, and the resolution of each is documented in the enclosure to this letter. This letter with its enclosure should be attached to the subject SE to document these resolutions.

The thoroughness of your staff in identifying these inconsistencies is appreciated, and is an important contribution in ensuring the accuracy of the SEs which form the basis for approval of licensing amendments. In this case, none of the inconsistencies identified by your staff resulted in a change to our conclusion in the subject SE. If you or your staff have any questions concerning the resolution to your comments contained in the enclosure, please call 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: Safety Evaluation Comment Resolution

cc w/encl: See next page

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SAFETY EVALUATION COMMENT RESOLUTION

ST. LUCIE UNITS 1 AND 2

AMENDMENTS NOS. 164 AND 106

FPL Comment 1: Staff states the large LOCA [loss-of-coolant accident] frequencies are on the order of E-4/yr. The proposed license amendment (PLA) states, "on the order of E-5/yr."

Staff Resolution: The staff used E-4/yr. as a maximum value. The staff's estimate of the most likely value is 3E-5/yr. Using this value would not change the staff conclusion.

FPL Comment 2: Staff refers to "RWST" [refueling water storage tank] and the PLA refers to the "RWT." Staff states "LPSI [low pressure safety injection] injects through a common header." This is not correct for Unit 2. The PLA describes the difference between Unit 1 and Unit 2.

Staff Resolution: The staff agrees with the Florida Power and Light Company (FPL) comment. The change does not affect the staff conclusion.

FPL Comment 3: Both units do not have sufficient condensate inventory to steam for 24 hours without makeup. Unit 2 has sufficient volume, but Unit 1 does not.

Staff Resolution: The staff agrees with the FPL comment. The change does not affect the staff conclusion.

FPL Comment 4: The Staff references risk assessment results provided in the original CEOG [Combustion Engineering Owners Group] Joint Applications Report but states/implies these are based on the St. Lucie updated baseline CDF [core damage frequency]. As discussed in the PLA, the input to the CEOG report was based on the IPE [individual plant examination] results and the PLA results are based on updated models.

Staff Resolution: The staff agrees with the FPL comment. The change does not affect the staff conclusion.

FPL Comment 5: The PLA does not refer to our risk assessment tool as the "Safety Monitor." The PLA refers to it as the "On-Line Risk Monitor."

Staff Resolution: The staff agrees with the FPL comment. The change does not affect the staff conclusion.

FPL Comment 6: The intent of the CRMP [Configuration Risk Management Program] as committed to in the PLA is not to implement 10 CFR 50.65 (a)(4) of the maintenance rule but to implement 10 CFR 50.65 (a)(3) of the maintenance rule.

Staff Resolution: The staff agrees with the FPL comment. The change does not affect the staff conclusion.

FPL Comment 7: The SE [safety evaluation] only refers to what the CRMP requirements are as stated by general RG [Regulatory Guide] 1.177 descriptions. The PLA is more detailed on how we propose to comply. Do we only have to address the program as stated in the SE or meet our more detailed description as stated in the PLA?

Staff Resolution: The program stated in the staff's SE is sufficient. FPL's more detailed description is acceptable.

FPL Comment 8: FPL did not submit comment 8.

Staff Resolution: No resolution needed.

FPL Comment 9: There are some references to a "part b above." FPL could not find this "part b." It may be an incorrect reference.

Staff Resolution: This comment refers to Section 4.3.3 of the SE. "Part b" begins on page 10 of the SE.

FPL Comment 10: The PLA does not refer to our risk assessment tool as the "Safety Monitor." The PLA refers to it as the "On-Line Risk Monitor."

The SE states/implies that we now have a program in place which meets the CRMP requirements, instead of stating that we will implement a program as part of our TS [technical specifications] implementation.

Staff Resolution: For the first part of FPL Comment 10, see the staff response to FPL comment 5. For the second part of the comment, the staff agrees with the FPL comment. The change does not affect the staff conclusion.

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

ST. LUCIE PLANT

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