Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

November 27, 2000

L-2000-131
10 CFR 50.90

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

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Application for Technical Specification Improvement
to Eliminate Requirements for Post-Accident Systems
Using the Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90, Florida Power & Light Company (FPL) is submitting a request for amendments to the technical specifications for St. Lucie Units 1 and 2.

The proposed amendments would delete Technical Specifications (TS) Section 6.8.4.e, "Post-accident Sampling," for St. Lucie Units 1 and 2 and thereby eliminate the requirements to have and maintain the post-accident sampling system (PASS) at St. Lucie Units 1 and 2. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of the technical specification improvement was announced in the *Federal Register* on October 31, 2000, as part of the consolidated line item improvement process (CLIIP).

The proposed elimination of the PASS has been discussed and concurred with by the State of Florida, Bureau of Radiation Control, as documented by letter dated January 6, 2000.

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant specific verifications. Attachment 2 provides the existing TS pages marked to show the proposed changes. Attachment 3 provides revised clean technical specification pages. Attachment 4 provides a summary of the licensing commitments made in this submittal.

FPL requests approval of the proposed license amendments by March 31, 2001, with the amendments being implemented within 120 days of issuance.

The proposed amendments have been reviewed by the St. Lucie Plant Facility Review Group and the FPL Company Nuclear Review Board. In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the state designee for the State of Florida.

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Please contact us if there are any questions concerning this submittal.

Very truly yours,

Rajiv S. Kundalkar

Rajiv S. Kundalkar
Vice President
St. Lucie Plant

RSK/GAC

Attachments:
1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Changes
4. Regulatory Commitments

cc: NRR Project Manager, USNRC, St. Lucie Plant
Regional Administrator, USNRC, Region II
Senior Resident Inspector, USNRC, St. Lucie Plant
Mr. W.A. Passetti, Florida Department of Health

STATE OF FLORIDA)
) ss.
COUNTY OF ST. LUCIE)

Rajiv S. Kundalkar being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

Rajiv S. Kundalkar

STATE OF FLORIDA

COUNTY OF ST. LUCIE

Sworn to and subscribed before me

this 27 day of November, 2000

by Rajiv S. Kundalkar, who is personally known to me.

Signature of Notary Public-State of Florida

Leslie J. Whitwell
MY COMMISSION # CC646183 EXPIRES
May 12, 2001
BONDED THRU TROY FAIN INSURANCE, INC.

Name of Notary Public (Print, Type, or Stamp)

ATTACHMENT 1
DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed license amendments delete the program requirements of TS 6.8.4.e, "Post-accident Sampling."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this technical specification improvement was announced in Federal Register, Vol. 65, No. 211, on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

FPL has reviewed the model safety evaluation published on October 31, 2000 as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (CE NPSD-1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System From the Plant Design and Licensing Bases for CEOG Utilities," dated May 5, 1999, as supplemented by letter dated April 14, 2000). FPL has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to St. Lucie Units 1 and 2 and justify this amendment for the incorporation of the changes to the St. Lucie Units 1 and 2 Technical Specifications.

2.2 Optional Changes and Variations

FPL is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

Requirements for installing and maintaining PASS were included in a Confirmatory Order issued to FPL on March 14, 1983, for St. Lucie Unit 1. The proposed license amendment requests include superseding the requirements by that Confirmatory Order.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

FPL has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. FPL has concluded that the proposed determination presented in the notice is applicable to St. Lucie Units 1 and 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in Federal Register on October 31, 2000 for this technical specification improvement, plant-specific verifications were performed as follows:

1. FPL will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be documented and will be implemented within the implementation period of the license amendments. Establishment of contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold has been established for St. Lucie Units 1 and 2 at radioactivity levels of 275 micro Ci/ml dose equivalent iodine. This capability will be described in plant chemistry procedures and implemented within the implementation period of the license amendments. The capability for classifying fuel damage events is considered a regulatory commitment.

3. FPL currently has the capability to monitor radioactive iodines that have been released off-site to the environment. This capability is described in the Emergency Plan, emergency plan implementing procedures, and health physics procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

FPL has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIIP. FPL has concluded that the staff's findings presented in that evaluation are applicable to St. Lucie Units 1 and 2 and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2
PROPOSED TECHNICAL SPECIFICATION CHANGES

St. Lucie Unit 1 Technical Specifications

St. Lucie Unit 2 Technical Specifications

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for all off-control point chemistry conditions, and

(vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Backup Method for Determining Subcooling Margin

A program which will ensure the capability to accurately monitor the Reactor Coolant System subcooling margin. This program shall include the following:

(i) Training of personnel, and

(ii) Procedures for monitoring.

e. Post-accident Sampling (DELETED)

~~A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:~~

DELETE

~~(i) Training of personnel,~~

~~(ii) Procedures for sampling and analysis, and~~

~~(iii) Provisions for maintenance of sampling and analysis equipment.~~

f. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR 20.1001 - 20.2401, Appendix B, Table 2, Column 2.

PROCEDURES AND PROGRAMS (Continued)

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points for these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for all off-control point chemistry conditions, and

(vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

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e. Post-accident Sampling (DELETED)

~~A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:~~

~~(i) Training of personnel,~~ DELETE

~~(ii) Procedures for sampling and analysis, and~~

~~(iii) Provisions for maintenance of sampling and analysis equipment.~~

ATTACHMENT 3
REVISED TECHNICAL SPECIFICATION PAGES

St. Lucie Unit 1 Technical Specifications

St. Lucie Unit 2 Technical Specifications

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for all off-control point chemistry conditions, and

(vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Backup Method for Determining Subcooling Margin

A program which will ensure the capability to accurately monitor the Reactor Coolant System subcooling margin. This program shall include the following:

(i) Training of personnel, and

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1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR 20.1001 - 20.2401, Appendix B, Table 2, Column 2.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (continued)

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points of these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for all off-control point chemistry conditions, and

(vi) A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Backup Method for Determining Subcooling Margin

A program which will ensure the capability to accurately monitor the Reactor Coolant System subcooling margin. This program shall include the following:

(i) Training of personnel, and

(ii) Procedures for monitoring.

e. DELETED

ATTACHMENT 4
LIST OF COMMITMENTS

The following table identifies those actions committed to by FPL in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Greg Casto, St. Lucie Plant Nuclear Licensing, at (561) 467-7606.

COMMITMENT	Due Date/Event
FPL will develop contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, containment sump, and containment atmosphere. The contingency plans will be documented and will be implemented within the implementation period of the license amendment. Establishment of contingency plans is considered a regulatory commitment.	120 days from date of issuance
The capability for classifying fuel damage events at the Alert level threshold has been established for St. Lucie Units 1 and 2 at radioactivity levels of 275 micro Ci/ml dose equivalent iodine. This capability will be described in plant chemistry procedures and implemented within the implementation period of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	120 days from date of issuance
FPL currently has the capability to monitor radioactive iodines that have been released offsite to the environment. This capability is described in the Emergency Plan, emergency plan implementing procedures, and health physics procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete