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

January 17, 2001

L-2001-13
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
Supplement to Removal of Technical Specifications
Bases From Technical Specifications Index

By Florida Power & Light Company (FPL) letter L-2000-160 dated July 26, 2000, FPL requested 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 the proposed amendments was to revise the TS Index to delete reference to the TS Bases since, in accordance with 10 CFR 50.36(a), the TS 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 Bases Control Program. The programmatic controls proposed in the original submittal were similar to TS 5.5.14 of NUREG-1432, Revision 1, *Standard Technical Specifications Combustion Engineering Plants*, in that they were modified to accommodate changes to the revised 10 CFR 50.59 rulemaking (i.e., replacing the obsolete term "unreviewed safety question").

During a conference call among FPL, the NRC Project Manager, and the NRC Technical reviewer on December 28, 2000, the NRC requested FPL to revise the proposed TS wording. The NRC requested that the wording be changed to be identical to the NRC approved wording in the Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-364 dated March 9, 2000.

The TS wording for the programmatic controls in this submittal are identical to the wording of TS 5.5.14 of NUREG-1432, Revision 1 as modified by TSTX-364. Attachment 1 provides the marked-up TS pages with the revised wording of the proposed Technical Specifications for St. Lucie Unit 1. Attachment 2 provides the marked-up TS pages with the revised wording of the proposed Technical Specifications for St. Lucie Unit 2.

The analysis of the amendment requests provided as Attachment 1 of the original submittal (L-2000-160) bounds the revised TS wording and remains valid. FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to

A001

10 CFR 50.92. The no significant hazard provided as Attachment 2 of the original submittal (L-2000-160) bounds the revised TS wording and remains valid.

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 about this request, please contact us.

Very truly yours,

Rajiv S. Kundalkar
Vice President
St. Lucie Plant

RSK/EJW/GRM

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant
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 17 day of January, 2001
by Rajiv S. Kundalkar, who is personally known to me.

Name of Notary Public - State of Florida

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

(Print, type or stamp Commissioned Name of Notary Public)

ATTACHMENT 1

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

PROPOSED REVISED TECHNICAL SPECIFICATIONS PAGES

St. Lucie Unit 1 Technical Specifications

6-15c

Insert for page 6-15c

Add new page 6-15d

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.

Insert

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.

move to new page 6-15d

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.

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.

1. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

2. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

    a. a change in the TS incorporated in the license; or

    b. a change to the updated UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59

3. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

4. Proposed changes that meet the criteria of Specification 6.8.4.j.2.a or 6.8.4.j.2.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 2

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

PROPOSED REVISED TECHNICAL SPECIFICATIONS PAGES

St. Lucie Unit 2 Technical Specifications

page 6-15c

Insert New page 6-15d

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.

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Insert

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