March 26, 2001

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

SUBJECT: ST. LUCIE UNIT 1 - REQUESTED CORRECTION/CLARIFICATION TO NRC SAFETY EVALUATION (TAC NOS. MA8109 AND MA8110)

Dear Mr. Plunkett:

By letter dated November 14, 2000, the U.S. Nuclear Regulatory Commission issued Amendment Nos.166 and 110 to Facility Operating License Nos. DPR-67 and NPF-16 for the Florida Power and Light Company (FPL) St. Lucie Plant, Unit Nos. 1 and 2, respectively. The amendments revised the Technical Specifications (TS) for the Pressurizer and Main Steam safety valve setpoints.

The FPL staff has informed us of an inaccuracy regarding the TS reference made in Section 2.1, Setpoint Tolerances -- St. Lucie Unit 1, of the safety evaluation (SE) supporting the amendments. We have resolved this by correction of the reference to TS 3.4.10, "Pressurizer Safety Valves," of the Combustion Engineering Standard TS. We have also taken this opportunity to correct a typographical error in the numbering of Section 2.2. The corrected page is included as an enclosure to this letter. Revisions are identified by a line in the margin. This letter with its enclosure should be attached to the subject SE to document the resolution of the inaccuracy. In this case, the inaccuracy does not result in a change to our conclusion in the subject SE that supports Amendment Nos. 166 and 110 for St. Lucie Units 1 and 2.

The thoroughness of your staff in identifying this inaccuracy is appreciated, and is an important contribution in ensuring the accuracy of the SEs, which form the basis for approval of licensing amendments. If you or your staff have any questions concerning the resolution of this matter, please call me at (301)415-1496.

Sincerely,

/RA B. Moroney for:/

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

Docket No. 50-335

Enclosure: Corrected SE Page

cc w/encl: See next page

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conditions with two or more PSVs inoperable, the Action items require that the plant be put in HOT STANDBY within 6 hours and HOT SHUTDOWN with all RCS cold-leg temperatures less than 281 ^{0}F within the next 6 hours. Since the proposed Action items met the intent of Combustion Engineering Standard TS 3.4.10, "Pressurizer Safety Valves," the staff concludes that they are acceptable.

2.2 Setpoint Tolerances -- St. Lucie Unit 2

To support the proposed TSs for PSV and MSSV setpoint tolerances, the licensee performed an evaluation to determine the impact on the design basis transients and accidents for St. Lucie Unit 2. Based on its evaluation, the licensee indicated in References 1 and 2 that all of the transients and accidents which could potentially challenge the PSVs and MSSVs were analyzed with the assumed setpoint tolerances that bounded the proposed tolerances of $\pm$2% for PSVs and +1% and -3% for MSSVs. The affected transients and accidents included the loss of condenser vacuum, feedwater line break (FLB), control element assembly withdrawal, asymmetric SG transient, SGTR event, and small-break loss-of-coolant accident. For the limiting pressurization case, the FLB event assumed tolerances of +3% for both PSVs and MSSVs. For the limiting dose release case, the SGTR event assumed a value of -3 % for MSSV tolerances (PSVs were not actuated during the SGTR event). The results of these analyses demonstrated that the acceptance criteria for each event were met. The licensee confirmed that the methodology used in the analyses was consistent with the Nuclear Regulatory Commission (NRC) approved methodology. The staff finds that the licensee's analyses of record were previously approved by NRC for license Amendment No. 105, and proposed setpoint tolerances are within the applicable ranges of the acceptable analyses. Therefore, the staff concludes that the proposed TSs are acceptable.

The licensee also added an Action item to the PSV LCO. The added Action item requires that with two or more PSVs inoperable, the plant be put in HOT STANDBY within 6 hours and HOT SHUTDOWN with all RCS cold-leg temperatures less than 230 ^{0}F within the next 6 hours. Since the added Action item met the intent of Action B of Combustion Engineering Standard TS 3.4.10, "Pressurizer Safety Valves," the staff concludes that the added item is acceptable.

2.3 PSV LCO Reformatting

In the previous TSs, there were two PSV LCOs: one for Modes 1 through 3 and one for Modes 4 and 5. Specifically, for Unit 1, RCS overpressure protection was provided via TS 3.4.2 for PSV operability in Modes 4 and 5, and TS 3.4.3 for PSV operability in Modes 1, 2, and 3.

Additionally, TS 3.4.13 required operability of the power-operated relief valves (PORVs) for low temperature overpressure protection (LTOP) when cold-leg temperatures were below a predetermined limit, which included operation in part of Mode 4, Mode 5 and Mode 6. The existing TSs created an overlap and inconsistency in RCS overprotection provided by the PSVs and PORVs. In order to remove the TS inconsistency, the licensee proposed to combine TS 3.4.2 and 3.4.3 into a single LCO and eliminate the PSV LCO applicability for Mode 5. In addition, PSV Mode 4 applicability would be limited to the condition when all the RCS temperatures >281 ^{0}F, the LTOP enable temperature.