December 12, 1985

Docket No. 50-335

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Mr. J. W. Williams, Jr.
Vice President
Nuclear Energy Department
Florida Power & Light Company
P. O. Box 14000
Juno Beach, Florida 33408

Dear Mr. Williams:

The Commission has issued the enclosed Amendment No. 70 to Facility Operating License No. DPR-67 for the St. Lucie Plant, Unit No. 1. This amendment consists of changes to the Technical Specifications in response to your application dated October 17, 1985 as supplemented by letter dated December 2, 1985.

This amendment revises the Technical Specifications to change the Linear Heat Generation Rate (LHGR) Limiting Condition for Operation (LCO) from a constant value of 15.0 Kw/ft to an axially dependent limit. In addition, the Local Power Density LCO curve and the associated Bases are changed. The fuel densification and thermal expansion uncertainty factor of 1.01 is deleted. Added is a license condition requiring the submittal of a supplement to EXXON Report XN-NF-85-117 for the Commission staff's review and approval. This supplement is to cover the complete large break LOCA spectrum results to demonstrate full compliance with the criteria of 10 CFR 50.46 and Appendix K to 10 CFR Part 50 with 15% tube plugging which will be considered following receipt of the supplement. Action on your request to allow you to exceed the limits of Figure 3.2-1 during the performance of Specification 4.1.1.4.2 is deferred until further justification is provided that shows that you can verify that the limit of 10 CFR 50.46 is not exceeded.

A copy of the related Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's next bi-weekly Federal Register notice.

Sincerely,

/S/

Donald E. Sells, Project Manager
PWR Project Directorate #8
Division of PWR Licensing-B

Enclosures:
1. Amendment No. 70 to DPR-67
2. Safety Evaluation

cc w/enclosures:
See next page

*See previous white for concurrences

PBD#8*	PBD#8	PBD#8*	OELD*
PKreutzer	DSells;ef	AThadani	JMcGurren
12/9/85	12/12/85	12/9/85	12/10/85

Signed

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P PDR

Docket No. 50-335

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Donald E. Sells, Project Manager
PWR Project Directorate #8
Division of PWR Licensing-B

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cc w/enclosures:
See next page

No legal objection
has led to conclusion
noted
McGuinn

PBD#8	PBD#8	PBD#8	OELD
PKreutzer	DSells;ef	AThadani	
12/9/85	12/9/85	12/9/85	12/10/85

Mr. J. W. Williams, Jr.
Florida Power & Light Company

St. Lucie Plant

cc:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 70
License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power & Light Company, (the licensee) dated October 17, 1985 as supplemented by letter dated December 2, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, Facility Operating License No. DPR-67 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, by amending paragraph 2.C.(2), and by adding a new paragraph 2.C(5) to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 70, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

   (5) The licensee shall provide a supplement to XN-NF-85-117, "St. Lucie Unit 1 Revised LCOA-ECCS Analysis with 15% Steam Generator Tube Plugging", that will provide the complete large break LOCA spectrum results to demonstrate full compliance with the criteria of 10 CFR 50.46 and Appendix K to 10 CFR Part 50 for the Commission staff's review and approval.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A C Thadani

Ashok C. Thadani, Director
PWR Project Directorate #8
Division of PWR Licensing-B

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 12, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 70

TO FACILITY OPERATING LICENSE NO. DPR-67

DOCKET NO. 50-335

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

Remove Pages	Insert Pages
3/4 2-2	3/4 2-2
3/4 2-3	3/4 2-3
3/4 2-4	3/4 2-4
B 3/4 2-1	B 3/4 2-1

3/4.2 POWER DISTRIBUTION LIMITS

LINEAR HEAT RATE

LIMITING CONDITION FOR OPERATION

3.2.1 The linear heat rate shall not exceed the limits shown on Figure 3.2-1.

APPLICABILITY: MODE 1.

ACTION:

With the linear heat rate exceeding its limits, as indicated by four or more coincident incore channels or by the AXIAL SHAPE INDEX outside of the power dependent control limits of Figure 3.2-2, within 15 minutes initiate corrective action to reduce the linear heat rate to within the limits and either:

a. Restore the linear heat rate to within its limits within one hour, or

b. Be in HOT STANDBY within the next 6 hours.

SURVEILLANCE REQUIREMENTS

4.2.1.1 The provisions of Specification 4.0.4 are not applicable.

4.2.1.2 The linear heat rate shall be determined to be within its limits by continuously monitoring the core power distribution with either the excore detector monitoring system or with the incore detector monitoring system.

4.2.1.3 Excore Detector Monitoring System - The excore detector monitoring system may be used for monitoring the core power distribution by:

a. Verifying at least once per 12 hours that the full length CEAs are withdrawn to and maintained at or beyond the Long Term Steady State Insertion Limit of Specification 3.1.3.6.

b. Verifying at least once per 31 days that the AXIAL SHAPE INDEX alarm setpoints are adjusted to within the limits shown on Figure 3.2-2.

used in the analysis establishing the DNB Margin LCO, and Thermal Margin/Low Pressure LSSS setpoints remain valid during operation at the various allowable CEA group insertion limits. If F_{xy}^T, F_r^T or T_q exceed their basic limitations, operation may continue under the additional restrictions imposed by the ACTION statements since these additional restrictions provide adequate provisions to assure that the assumptions used in establishing the Linear Heat Rate, Thermal Margin/Low Pressure and Local Power Density - High LCOs and LSSS setpoints remain valid. An AZIMUTHAL POWER TILT > 0.10 is not expected and if it should occur, subsequent operation would be restricted to only those operations required to identify the cause of this unexpected tilt.

The requirement that the measured value of $(1+T_q)$ be multiplied by the calculated values of F_r and F_{xy} to determine F_{xy}^T is applicable only when F_r and F_{xy} are calculated with a non-full core power distribution analysis. With a full core power distribution analysis code the azimuthal tilt is explicitly accounted for as part of the radial power distribution used to calculate F_{xy} and F_r.

The surveillance requirements for verifying that F_{xy}^T, F_r^T and T_q are within their limits provide assurance that the actual values of F_{xy}^T, F_r^T and T_q do not exceed the assumed values. Verifying F_{xy}^T and F_r^T after each fuel loading prior to exceeding 75% of RATED THERMAL POWER provides additional assurance that the core was properly loaded.

3/4.2.5 DNB PARAMETERS

The limits on the DNB related parameters assure that each of the parameters are maintained within the normal steady state envelope of operation assumed in the transient and accident analyses. The limits are consistent with the safety analyses assumptions and have been analytically demonstrated adequate to maintain a minimum DNBR of $\geq$ 1.22 throughout each analyzed transient.

The 12 hour periodic surveillance of these parameters through instrument readout is sufficient to ensure that the parameters are restored within their limits following load changes and other expected transient operation. The 18 month periodic measurement of the RCS total flow rate is adequate to detect flow degradation and ensure correlation of the flow indication channels with measured flow such that the indicated percent flow will provide sufficient verification of flow rate on a 12 hour basis.

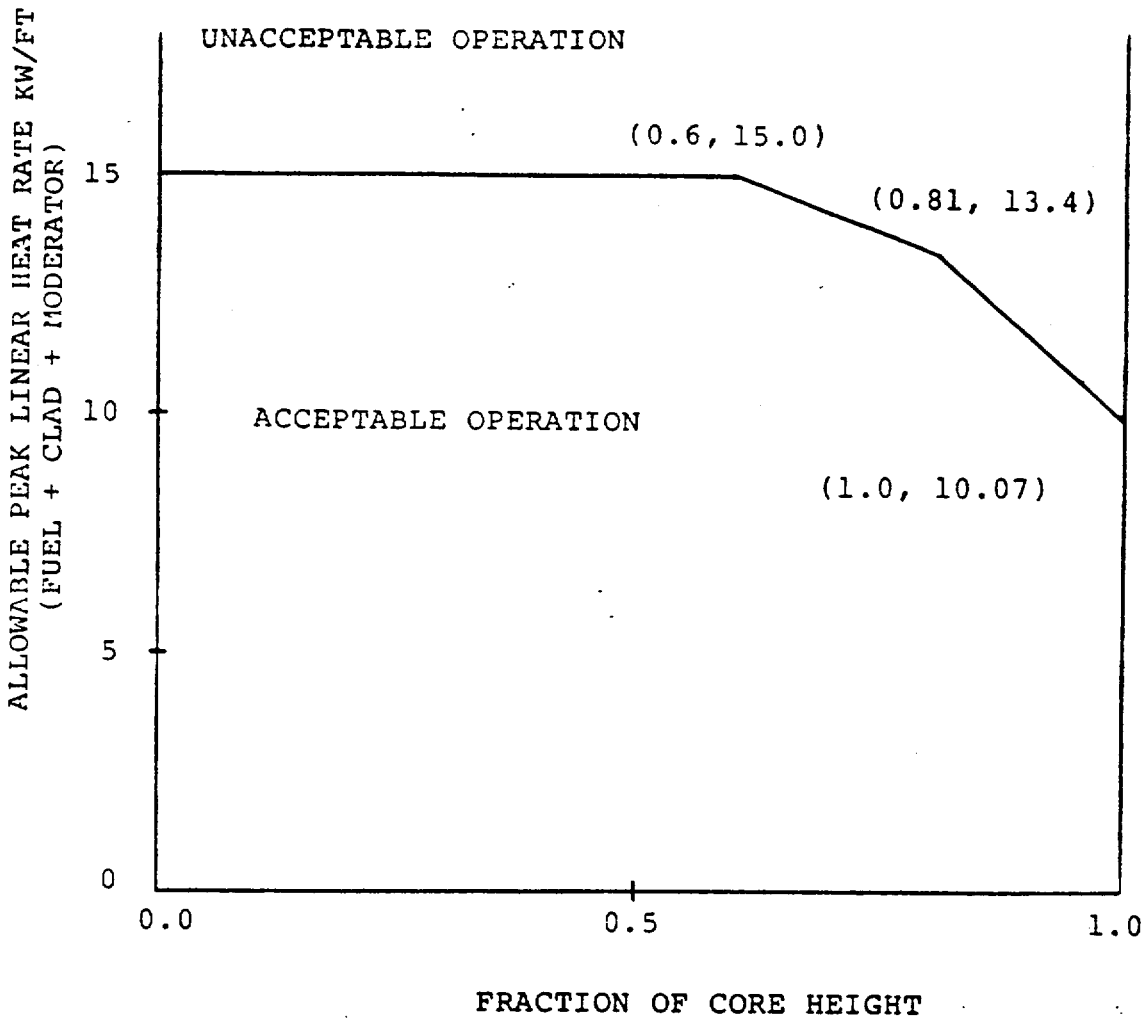

FIGURE 3.2-1 ALLOWABLE PEAK LINEAR HEAT RATE VERSUS FRACTION OF CORE HEIGHT

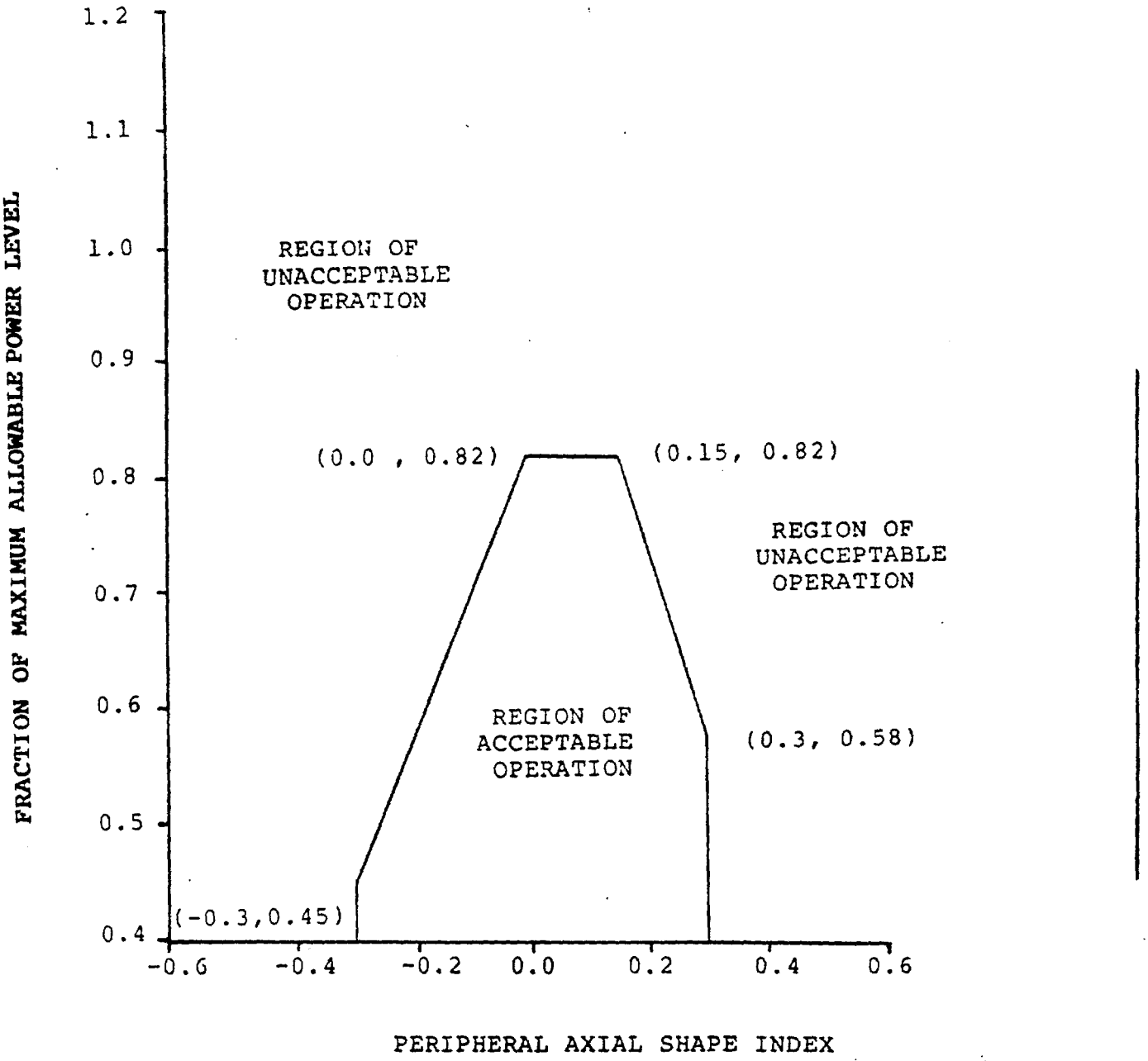

FIGURE 3.2-2

AXIAL SHAPE INDEX vs. MAXIMUM ALLOWABLE POWER LEVEL PER SPECIFICATION 4.2.1.3

3/4.2.1 LINEAR HEAT RATE

The limitation on linear heat rate ensures that in the event of a LOCA, the peak temperature of the fuel cladding will not exceed 2200°F.

Either of the two core power distribution monitoring systems, the Excore Detector Monitoring System and the Incore Detector Monitoring System, provides adequate monitoring of the core power distribution and is capable of verifying that the linear heat rate does not exceed its limits. The Excore Detector Monitoring System performs this function by continuously monitoring the AXIAL SHAPE INDEX with the OPERABLE quadrant symmetric excore neutron flux detectors and verifying that the AXIAL SHAPE INDEX is maintained within the allowable limits of Figure 3.2-2. In conjunction with the use of the excore monitoring system and in establishing the AXIAL SHAPE INDEX limits, the following assumptions are made: 1) the CEA insertion limits of Specifications 3.1.3.5 and 3.1.3.6 are satisfied, 2) the AZIMUTHAL POWER TILT restrictions of Specification 3.2.4 are satisfied, and 3) the TOTAL PLANAR RADIAL PEAKING FACTOR does not exceed the limits of Specification 3.2.2.

The Incore Detector Monitoring System continuously provides a direct measure of the peaking factors and the alarms which have been established for the individual incore detector segments ensure that the peak linear heat rates will be maintained within the allowable limits of Figure 3.2-1. The setpoints for these alarms include allowances, set in the conservative directions, for 1) a measurement-calculational uncertainty factor of 1.07, 2) an engineering uncertainty factor of 1.03, 3) a THERMAL POWER measurement uncertainty factor of 1.02.

3/4.2.2, 3/4.2.3 and 3/4.2.4 TOTAL PLANAR AND INTEGRATED RADIAL PEAKING FACTORS - F_{xy}^T AND F_r^T AND AZIMUTHAL POWER TILT - T_q

The limitations on F_{xy}^T and T_q are provided to ensure that the assumptions used in the analysis for establishing the Linear Heat Rate and Local Power Density-High LCOs and LSSS setpoints remain valid during operation at the various allowable CEA group insertion limits. The limitations on F_r^T and T_q are provided to ensure that the assumptions

c. Verifying that the AXIAL SHAPE INDEX is maintained within the allowable limits of Figure 3.2-2, where 100 percent of maximum allowable power represents the maximum THERMAL POWER allowed by the following expression:

M x N

where:

1. M is the maximum allowable THERMAL POWER level for the existing Reactor Coolant Pump combination.

2. N is the maximum allowable fraction of RATED THERMAL POWER as determined by the F^T_{xy} curve of Figure 3.2-3.

4.2.1.4 Incore Detector Monitoring System# - The incore detector monitoring system may be used for monitoring the core power distribution by verifying that the incore detector Local Power Density alarms:

a. Are adjusted to satisfy the requirements of the core power distribution map which shall be updated at least once per 31 days of accumulated operation in MODE 1.

b. Have their alarm setpoint adjusted to less than or equal to the limits shown on Figure 3.2-1 when the following factors are appropriately included in the setting of these alarms:

1. A measurement-calculational uncertainty factor of 1.07,

2. An engineering uncertainty factor of 1.03,

3. A THERMAL POWER measurement uncertainty factor of 1.02.

#If the core system becomes inoperable, reduce power to M x N within 4 hours and monitor linear heat rate in accordance with Specification 4.2.1.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 70

TO FACILITY OPERATING LICENSE NO. DPR-67

FLORIDA POWER & LIGHT COMPANY

ST. LUCIE PLANT, UNIT NO. 1

DOCKET NO. 50-335

INTRODUCTION

The licensee notified the NRC, on August 27, 1985, that an input data error had been found in the Exxon Nuclear Company (ENC) large break LOCA-ECCS Evaluation Model and administratively restricted the Linear Heat Generation Rate (LHGR) limit to 14.0 Kw/ft from 15.0 Kw/ft for the remainder of Cycle 6 (Reference 1). Because of this error, a revised large break LOCA-ECCS study (XN-NF-85-117) was performed by ENC in support of the Cycle 7 safety analysis (Reference 2). As a result of the re-analysis, it was determined that Technical Specifications changes are needed to assure continued compliance with 10 CFR 50.46 criteria. On October 17, 1985, the licensee submitted a proposed license amendment for the LHGR Limiting Condition for Operation (LCO) (Reference 3).

The proposed changes will change the LHGR LCO from the constant value of 15 Kw/ft to an axially dependent LHGR limit. The allowable local power density limits for operation when incore detectors are out of service will also be lowered. The third change will be removal of the LHGR uncertainty factor for axial fuel densification and thermal expansion. The final change requested will not require the LCO on LHGR to be met during Moderator Temperature Coefficent testing.

While not specifically mentioned in the proposed amendment, the large break LOCA re-analysis (XN-NF-85-117) also pertains to an increased limit on the allowable steam generator tube plugging, from 5% to 15% uniform plugging. The Cycle 7 safety analysis for non-LOCA transients and accidents is found in XN-NF-85-73 Revision 2 (Reference 4).

The scope of this safety evaluation is limited to the large break LOCA - ECCS re-analysis in support of the proposed license amendment for the LHGR LCO Technical Specifications changes. The proposed increase in plugging is not encompassed in this licensing action. In addition to the review of the proposed amendment and XN-NF-85-117, the NRC has also reviewed the licensee's responses (Reference 5) to our request for additional information covering the large break LOCA - ECCS re-analysis.

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EVALUATION

The revised large break LOCA - ECSS performance analysis was made using an NRC-approved evaluation model (EM) which satisfies the requirements of 10 CFR 50.46 and Appendix K to Part 50. The methods for accounting for steam generator tube plugging are based on ENC's experience with the EM model and chosen as being representative of the worst case for the level of steam generator tube plugging, 15% uniform average plugging with as much as 4% asymmetry between the two steam generators. The current (as of November 26, 1985) fraction of plugged tubes are 4% and 3.6%. The effects of the increased plugging (from 5% to 15%), and asymmetric plugging, on non-LOCA transients and accidents is not addressed in this safety evaluation.

The identification of the limiting large break LOCA in XN-NF-85-117 is based on results which are preliminary insofar as the increase to 15% plugging is concerned. A supplement to XN-NF-85-117 containing the large break LOCA spectrum results and exposure study results is currently in preparation. This supplement will contain the final break spectrum results using the 15 Kw/ft power profile peaked at 0.6 x/l.

The break spectrum results provided in XN-NF-85-117 show that the double-ended guillotine cold leg break with a discharge coefficient of 0.8 (0.8DECLG) has the highest fuel and cladding temperature at the end of the blowdown portion of the LOCA. ENC analyses using REFLEX and TOODEE2, NRC-approved evaluation model computer programs, have consistently shown that the refill and reflood behavior differs little between breaks in a large break LOCA spectrum. Therefore, the LOCA with the highest temperature at the end of blowdown will also yield the highest peak cladding temperature during reflood. Since the 0.8 DECLG break is the most limiting, this break size was used to establish the Linear Heat Generation Rate (LHGR) limits for St. Lucie 1 Cycle 7, and beyond.

The bounding power distribution was determined from the 0.8 DECLG break system bounding conditions. Two points were determined. At 0.6 of the active core length (0.6x/l) the peak LHGR was found to be 15 Kw/ft. A peak LHGR of 13.4 Kw/ft was found at the 0.81x/l elevation. These power distributions meet the criteria of 10 CFR 50.46 and are the basis for the proposed license amendment, Item 1 of Reference 3.

Based on the large break LOCA spectrum results provided in XN-NF-85-117, the limiting large break LOCA was found to be a 0.8 DEGCL break. The Limiting Heat Generation Rate (LHGR) was found to be 15 Kw/ft at 0.6 of the active core height (0.6x/l). The peak cladding temperature is calculated to be 2188°F. The total core hydrogen generation is less than 1% and the local cladding oxidation is 9.47% for the limiting break. These values are within the required limits as specified in 10 CFR 50.46. The staff finds the revised analysis is acceptable for the determination of the LHGR LCO Technical Specifications limits.

The acceptability of the proposed license amendment includes a condition requiring the submittal of the supplement to XN-NF-85-117 which will provide the complete large break LOCA spectrum results. These results are required to demonstrate full compliance with the criteria of 10 CFR 50.46 and Appendix K to Part 50 with 15% tube plugging. The staff expects that the limiting break size and location will not change as a result of the supplemental analyses.

The change to the LHGR LCO, Technical Specification 3.2.1, results in a more restrictive limit for the allowable peak linear heat generation rate. The limitation on LHGR ensures that in the event of a Loss of Coolant Accident (LOCA), the peak temperature of the fuel cladding will not exceed 2200°F. A review of the results as presented in XN-NF-85-117 (St. Lucie 1 Revised LOCA-ECCS analysis with 15% Steam Generator Tube Plugging) indicates the following.

(a) The calculated peak fuel element clad temperature does not exceed the 2200°F limit.

(b) The amount of fuel element cladding that reacts chemically with water or steam does not exceed 1% of the total amount of zircalloy in the reactor.

(c) The cladding temperature transient is terminated at a time when the core geometry is still amenable to cooling. The hot fuel rod cladding oxidation limits of 17% are not exceeded during or after quenching.

(d) The system long term cooling capability provided for previous cores remains applicable for ENC fuel.

The allowable local power density limits for operation when in-core detectors are out of service (Technical Specification 4.2.1.3, Figure 3.2-2) has been narrowed to reflect the changes to the linear heat generation rate limit. ENC statistical methodology was used to determine the allowed power versus Axial Shape Index incorporating appropriate uncertainties.

The ENC safety analyses include the fuel densification and thermal expansion uncertainty factor in the engineering factor. Thus, it is not necessary to apply the 1.01 fuel densification and thermal expansion uncertainty factor to adjust the alarm setpoint. Therefore, the fuel densification and thermal expansion uncertainty factor is deleted from Technical Specification 4.2.1.4 and the Bases 3/4.2.1.

The licensee has requested that the LHGR LCO be footnoted to allow for exceeding the limits of Figure 3.2-1 during performance of Specification 4.1.1.4.2, Moderator Temperature Coefficient (MTC) testing. This is necessary because during full power MTC testing, the measured linear heat rate typically increases due to a CEA insertion.

The highest axial linear heat rate is expected during the beginning of Cycle 7 MTC testing. The predicted LHGR is not expected to exceed the limit of Technical Specification Figure 3.2-1. However, the alarm setpoint for the incore detectors that are used to ensure compliance with the linear heat rate Technical Specifications are subject to radial peaking and could alarm prematurely during MTC testing. Because of this incore detector response during the MTC test, the special test exception was requested. The staff has elected to defer action on this request until the licensee can positively demonstrate that the LHGR limit will not be exceeded if an incore detector alarm should occur during MTC testing.

The staff has reviewed the material submitted by the licensee in the October 17, 1985 submittal and the additional clarifying information submitted in the letter dated December 2, 1985. Based on the review of this material and the above discussion, the staff finds the proposed changes, with the exception of the request to exceed LHGR limits during MTC testing, to the St. Lucie 1 Technical Specifications acceptable.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9). Pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: December 12, 1985

Principal Contributors:
E. Throm
M. Chatterton
D. Sells

REFERENCES

1. Docket No. 50-335, Florida Power and Light letter L-85-331, J. W. Williams, Jr, (FPL) to H. L. Thompson (NRC), dated August 27, 1985.

2. XN-NF-85-117, "St. Lucie Unit 1 Revised LOCA-ECCS Analysis with 15% Steam Generator Tube Plugging," Exxon Nuclear Company, Inc., November 5, 1985.

3. Docket No. 50-335, Florida Power and Light letter L-85-3967, J. W. Williams, Jr. (FPL) to H. L. Thompson (NRC), dated October 17, 1985.

4. XN-NF-85-73, Revision 2, "St. Lucie Unit 1 Cycle 7 Safety Analysis Report," Exxon Nuclear Company, Inc., October 28, 1985.

5. Docket No. 50-335, Florida Power and Light letter L-85-447, J. W. Williams, Jr. (FPL) to H. L. Thompson (NRC), dated December 2, 1985.