

June 6, 1995

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Mr. J. H. Goldberg  
President - Nuclear Division  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: LIMITING  
CONDITION OF OPERATION FOR INCORE DETECTORS (TAC NOS. M91406 AND  
M91407)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment Nos. 136 and 75 to Facility  
Operating License Nos. DPR-67 and NPF-16 for the St. Lucie Plant, Unit Nos. 1  
and 2. These amendments consist of changes to the Technical Specifications in  
response to your application dated January 20, 1995.

These amendments will relocate the operability requirements for the Incore  
Detectors in Technical Specification 3/4.3.3.2 to the Updated Final Safety  
Analysis Report, and revise Linear Heat Rate Surveillance 4.2.1.4, and Special  
Test Exceptions Surveillances 4.10.2.2, 4.10.4.2 (Unit 2 only), and 4.10.5.2,  
accordingly.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will  
be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by:

Jan A. Norris, Senior Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosures:

1. Amendment No. 136 to DPR-67
2. Amendment No. 75 to NPF-16
3. Safety Evaluation

cc w/enclosures: See next page

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DATED: June 6, 1995

AMENDMENT NO. 136 TO FACILITY OPERATING LICENSE NO. DPR-67 - ST. LUCIE, UNIT 1  
AMENDMENT NO. 75 TO FACILITY OPERATING LICENSE NO. NPF-16 - ST. LUCIE, UNIT 2

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 6, 1995

Mr. J. H. Goldberg  
President - Nuclear Division  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: LIMITING  
CONDITION OF OPERATION FOR INCORE DETECTORS (TAC NOS. M91406 AND  
M91407)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment Nos. 136 and 75 to Facility Operating License Nos. DPR-67 and NPF-16 for the St. Lucie Plant, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications in response to your application dated January 20, 1995.

These amendments will relocate the operability requirements for the Incore Detectors in Technical Specification 3/4.3.3.2 to the Updated Final Safety Analysis Report, and revise Linear Heat Rate Surveillance 4.2.1.4, and Special Test Exceptions Surveillances 4.10.2.2, 4.10.4.2 (Unit 2 only), and 4.10.5.2, accordingly.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan A. Norris".

Jan A. Norris, Senior Project Manager  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosures:

1. Amendment No. 136 to DPR-67
2. Amendment No. 75 to NPF-16
3. Safety Evaluation

cc w/enclosures: See next page

Mr. J. H. Goldberg  
Florida Power and Light Company

St. Lucie Plant

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 136  
License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated January 20, 1995, 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.

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, and by amending paragraph 2.C.(2) to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 136, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*Barnt C. Buckley for*

David B. Matthews, Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: June 6, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 136

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.

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SURVEILLANCE REQUIREMENTS (continued)

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- 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:

$$M \times N$$

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  $F_r^T$  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.

---

\* If the incore system becomes inoperable, reduce power to M x N within 4 hours and monitor linear heat rate in accordance with Specification 4.2.1.3.

PAGE 3/4 3-26 (ORIGINAL) HAS BEEN DELETED FROM THE  
TECHNICAL SPECIFICATIONS. THE NEXT PAGE IS 3/4 3-27.

### 3/4.10 SPECIAL TEST EXCEPTIONS

#### SHUTDOWN MARGIN

#### LIMITING CONDITION FOR OPERATION

---

3.10.1 The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 may be suspended for measurement of CEA worth and shutdown margin provided reactivity equivalent to at least the highest estimated CEA worth is available for trip insertion from OPERABLE CEA(s).

APPLICABILITY: MODE 2.

#### ACTION:

- a. With any full length CEA not fully inserted and with less than the above reactivity equivalent available for trip insertion, immediately initiate and continue boration at  $> 40$  gpm of 1720 ppm boric acid solution or its equivalent until the SHUTDOWN MARGIN required by Specification 3.1.1.1 is restored.
- b. With all full length CEAs inserted and the reactor subcritical by less than the above reactivity equivalent, immediately initiate and continue boration at  $> 40$  gpm of 1720 ppm boric acid solution or its equivalent until the SHUTDOWN MARGIN required by Specification 3.1.1.1 is restored.

#### SURVEILLANCE REQUIREMENTS

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4.10.1.1 The position of each full length CEA required either partially or fully withdrawn shall be determined at least once per 2 hours.

4.10.1.2 Each CEA not fully inserted shall be demonstrated capable of full insertion when tripped from at least the 50% withdrawn position within 7 days prior to reducing the SHUTDOWN MARGIN to less than the limits of Specification 3.1.1.1.

## **SPECIAL TEST EXCEPTIONS**

### **GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS**

#### **LIMITING CONDITION FOR OPERATION**

---

- 3.10.2 The group height, insertion and power distribution limits of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.2, 3.1.3.5, 3.1.3.6, 3.2.3 and 3.2.4 may be suspended during the performance of PHYSICS TESTS provided:
- a. The THERMAL POWER is restricted to the test power plateau which shall not exceed 85% of RATED THERMAL POWER, and
  - b. The limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.2.2 below.

**APPLICABILITY:** MODES 1 and 2.

#### **ACTION:**

With any of the limits of Specification 3.2.1 being exceeded while the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.2, 3.1.3.5, 3.1.3.6, 3.2.3 and 3.2.4 are suspended, either:

- a. Reduce THERMAL POWER sufficiently to satisfy the requirements of Specification 3.2.1, or
- b. Be in HOT STANDBY within 6 hours.

#### **SURVEILLANCE REQUIREMENTS**

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- 4.10.2.1 The THERMAL POWER shall be determined at least once per hour during PHYSICS TESTS in which the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.3, or 3.2.4 are suspended and shall be verified to be within the test power plateau.
- 4.10.2.2 The linear heat rate shall be determined to be within the limits of Specification 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specifications 4.2.1.4 during PHYSICS TESTS above 5% of RATED THERMAL POWER in which the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.3, or 3.2.4 are suspended.

## **SPECIAL TEST EXCEPTI**

### **CENTER CEA MISALIGNMENT**

#### **LIMITING CONDITION FOR OPERATION**

---

- 3.10.5 The requirements of Specifications 3.1.3.1 and 3.1.3.6 may be suspended during the performance of PHYSICS TESTS to determine the isothermal temperature coefficient and power coefficient provided:
- a. Only the center CEA (CEA #1) is misaligned, and
  - b. The limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.5.2 below.

**APPLICABILITY:** MODES 1 and 2.

#### **ACTION:**

With any of the limits of Specification 3.2.1 being exceeded while the requirements of Specifications 3.1.3.1 and 3.1.3.6 are suspended, either:

- a. Reduce THERMAL POWER sufficiently to satisfy the requirements of Specification 3.2.1, or
- b. Be in HOT STANDBY within 6 hours.

#### **SURVEILLANCE REQUIREMENTS**

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- 4.10.5.1 The THERMAL POWER shall be determined at least once per hour during PHYSICS TESTS in which the requirements of Specifications 3.1.3.1 and/or 3.1.3.6 are suspended and shall be verified to be within the test power plateau.
- 4.10.5.2 The linear heat rate shall be determined to be within the limits of Specification 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specification 4.2.1.4 during PHYSICS TESTS above 5% of RATED THERMAL POWER in which the requirements of Specifications 3.1.3.1 and/or 3.1.3.6 are suspended.

## **3/4.2 POWER DISTRIBUTION LIMITS**

### **BASES**

---

#### **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 INTEGRATED RADIAL PEAKING FACTOR does not exceed the limits of Specification 3.2.3.

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 conservative directions, for 1) a measurement-calculational uncertainty factor, 2) an engineering uncertainty factor, 3) a THERMAL POWER measurement uncertainty factor.

#### **3/4.2.3 and 3/4.2.4 TOTAL INTEGRATED RADIAL PEAKING FACTOR - $F_r^T$ AND AZIMUTHAL POWER TILT - $T_q$**

The limitations on  $F_r^T$  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 and

### 3/4.3 INSTRUMENTATION

#### BASES

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#### 3/4.3.1 and 3/4.3.2 PROTECTIVE AND ENGINEERED SAFETY FEATURES (ESF) INSTRUMENTATION

The OPERABILITY of the protective and ESF instrumentation systems and bypasses ensure that 1) the associated ESF action and/or reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its setpoint, 2) the specified coincidence logic is maintained, 3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and 4) sufficient system functional capability is available for protective and ESF purposes from diverse parameters.

The OPERABILITY of these systems is required to provide the overall reliability, redundancy and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. The integrated operation of each of these systems is consistent with the assumptions used in the accident analyses.

The surveillance requirements specified for these systems ensure that the overall system functional capability is maintained comparable to the original design standards. The periodic surveillance tests performed at the minimum frequencies are sufficient to demonstrate this capability.

The measurement of response time at the specified frequencies provides assurance that the protective and ESF action function associated with each channel is completed within the time limit assumed in the accident analyses. No credit was taken in the analyses for those channels with response times indicated as not applicable.

Response time may be demonstrated by any series of sequential, overlapping or total channel test measurements provided that such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either 1) in place, onsite or offsite test measurements or 2) utilizing replacement sensors with certified response times.

The Safety Injection Actuation Signal (SIAS) provides direct actuation of the Containment Isolation Signal (CIS) to ensure containment isolation in the event of a small break LOCA.

#### 3/4.3.3 MONITORING INSTRUMENTATION

##### 3/4.3.3.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring channels ensures that 1) the radiation levels are continually measured in the areas served

## **INSTRUMENTATION**

### **BASES**

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#### **RADIATION MONITORING INSTRUMENTATION** (continued)

by the individual channels; and (2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded; and (3) sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," December 1980 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

#### **3/4.3.3.2 Deleted**

#### **3/4.3.3.3 Deleted**

#### **3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION**

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs," February 1972.

#### **3/4.3.3.5 REMOTE SHUTDOWN INSTRUMENTATION**

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

FLORIDA POWER & LIGHT COMPANY  
ORLANDO UTILITIES COMMISSION OF  
THE CITY OF ORLANDO, FLORIDA  
AND  
FLORIDA MUNICIPAL POWER AGENCY  
DOCKET NO. 50-389  
ST. LUCIE PLANT UNIT NO. 2  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 75  
License No. NPF-16

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated January 20, 1995, 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.

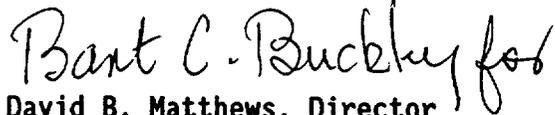
2. Accordingly, Facility Operating License No. NPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.2 to read as follows:

2. Technical Specifications

- The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 75, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



David B. Matthews, Director  
Project Directorate II-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: June 6, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 75  
TO FACILITY OPERATING LICENSE NO. NPF-16  
DOCKET NO. 50-389

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.

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| COLD SHUTDOWN (LOOPS NOT FILLED) .....   | 3/4 4-6            |

## 3/4.2 POWER DISTRIBUTION LIMITS

### 3/4 2:1 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 1 hour, or
- b. Be in at least HOT STANDBY within the next 6 hours.

#### SURVEILLANCE REQUIREMENTS

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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 limit shown on Figure 3.2-2.

**SURVEILLANCE REQUIREMENTS (Continued)**

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

$$M \times N$$

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  $F_{xy}^T$  curve of Figure 3.2-3.

4.2.1.4 Incore Detector Monitoring System<sup>#</sup> - 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.

---

# If incore system becomes inoperable, reduce power to M x N within 4 hours and monitor linear heat rate in accordance with Specification 4.2.1.3.

PAGE 3/4 3-31 (ORIGINAL) HAS BEEN DELETED FROM THE TECHNICAL SPECIFICATIONS.

THE NEXT PAGE IS 3/4 3-32.

## **SPECIAL TEST EXCEPTIONS**

### **3/4.10.2 MODERATOR TEMPERATURE COEFFICIENT, GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS**

#### **LIMITING CONDITION FOR OPERATION**

---

- 3.10.2 The moderator temperature coefficient, group height, insertion and power distribution limits of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.2, 3.2.3 and 3.2.4 may be suspended during the performance of PHYSICS TESTS provided:
- a. The THERMAL POWER is restricted to the test power plateau which shall not exceed 85% of RATED THERMAL POWER, and
  - b. The limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.2.2 below.

**APPLICABILITY:** MODES 1 and 2.

#### **ACTION:**

With any of the limits of Specification 3.2.1 being exceeded while the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.2, 3.2.3 and 3.2.4 are suspended, either:

- a. Reduce THERMAL POWER sufficiently to satisfy the requirements of Specification 3.2.1, or
- b. Be in HOT STANDBY within 6 hours.

#### **SURVEILLANCE REQUIREMENTS**

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- 4.10.2.1 The THERMAL POWER shall be determined at least once per hour during PHYSICS TESTS in which the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.2, 3.2.3, or 3.2.4 are suspended and shall be verified to be within the test power plateau.
- 4.10.2.2 The linear heat rate shall be determined to be within the limits of Specification 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specification 4.2.1.4 during PHYSICS TESTS above 5% of RATED THERMAL POWER in which the requirements of Specifications 3.1.1.4, 3.1.3.1, 3.1.3.5, 3.1.3.6, 3.2.2, 3.2.3, or 3.2.4 are suspended.

## SPECIAL TEST EXCEPTIONS

### 3/4.10.3 REACTOR COOLANT LOOPS

#### LIMITING CONDITION FOR OPERATION

---

3.10.3 The limitations of Specification 3.4.1 and noted requirements of Tables 2.2-1 and 3.3-1 may be suspended during the performance of startup and PHYSICS TESTS, provided:

- a. The THERMAL POWER does not exceed 5% of RATED THERMAL POWER, and
- b. The reactor trip setpoints of the OPERABLE power level channels are set at less than or equal to 20% of RATED THERMAL POWER.

APPLICABILITY: During startup and PHYSICS TESTS.

#### ACTION:

With the THERMAL POWER greater than 5% of RATED THERMAL POWER, immediately trip the reactor.

#### SURVEILLANCE REQUIREMENTS

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4.10.3.1 The THERMAL POWER shall be determined to be less than or equal to 5% of RATED THERMAL POWER at least once per hour during startup and PHYSICS TESTS.

4.10.3.2 Each wide range logarithmic and power level neutron flux monitoring channel shall be subjected to a CHANNEL FUNCTIONAL TEST within 12 hours prior to initiating startup and PHYSICS TESTS.

## **SPECIAL TEST EXCEPTI...S**

### **3/4.10.4 CENTER CEA MISALIGNMENT**

#### **LIMITING CONDITION FOR OPERATION**

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- 3.10.4 The requirements of Specifications 3.1.3.1 and 3.1.3.6 may be suspended during the performance of PHYSICS TESTS to determine the isothermal temperature coefficient, moderator temperature coefficient and power coefficient provided:
- a. Only the center CEA (CEA #1) is misaligned, and
  - b. The limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.4.2 below.

**APPLICABILITY:** MODES 1 and 2.

#### **ACTION:**

With any of the limits of Specification 3.2.1 being exceeded while the requirements of Specifications 3.1.3.1 and 3.1.3.6 are suspended, either:

- a. Reduce THERMAL POWER sufficiently to satisfy the requirements of Specification 3.2.1, or
- b. Be in HOT STANDBY within 6 hours.

#### **SURVEILLANCE REQUIREMENTS**

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- 4.10.4.1 The THERMAL POWER shall be determined at least once per hour during PHYSICS TESTS in which the requirements of Specifications 3.1.3.1 and/or 3.1.3.6 are suspended and shall be verified to be within the test power plateau.
- 4.10.4.2 The linear heat rate shall be determined to be within the limits of Specification 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specification 4.2.1.4 during PHYSICS TESTS above 5% of RATED THERMAL POWER in which the requirements of Specifications 3.1.3.1 and/or 3.1.3.6 are suspended.

## **SPECIAL TEST EXCEPTI S**

### **3/4.10.5 CEA INSERTION DURING ITC, MTC, AND POWER COEFFICIENT MEASUREMENTS**

#### **LIMITING CONDITION FOR OPERATION**

3.10.5 The requirements of Specifications 3.1.3.1 and 3.1.3.6 may be suspended during the performance of PHYSICS TESTS to determine the isothermal temperature coefficient, moderator temperature coefficient, and power coefficient provided the limits of Specification 3.2.1 are maintained and determined as specified in Specification 4.10.5.2 below.

**APPLICABILITY:** MODES 1 and 2.

#### **ACTION:**

With any of the limits of Specification 3.2.1 being exceeded while the requirements of Specifications 3.1.3.1 and 3.1.3.6 are suspended, either:

- a. Reduce THERMAL POWER sufficiently to satisfy the requirements of Specification 3.2.1, or
- b. Be in HOT STANDBY within 6 hours.

#### **SURVEILLANCE REQUIREMENTS**

- 4.10.5.1 The THERMAL POWER shall be determined at least once per hour during PHYSICS TESTS in which the requirements of Specifications 3.1.3.1 and 3.1.3.6 are suspended and shall be verified to be within the test power plateau.
- 4.10.5.2 The linear heat rate shall be determined to be within the limits of Specification 3.2.1 by monitoring it continuously with the Incore Detector Monitoring System pursuant to the requirements of Specification 4.2.1.4 during PHYSICS TESTS above 5% of RATED THERMAL POWER in which the requirements of Specifications 3.1.3.1 and 3.1.3.6 are suspended.

**BASES**

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**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 are 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, (2) an engineering uncertainty factor, (3) an allowance for axial fuel densification and thermal expansion, and (4) a THERMAL POWER measurement uncertainty factor.

**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 used in the analysis establishing the DNB Margin LCO, the 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

## POWER DISTRIBUTION LIMITS

### BASES

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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  $T_q$  be multiplied by the calculated values of  $F_r$  and  $F_{xy}$  to determine  $F_r^T$  and  $F_{xy}^T$  is applicable only when  $F_r$  and  $F_{xy}$  are calculated with a non-full core power distribution analysis code. When monitoring a reactor core power distribution,  $F_r$  or  $F_{xy}$  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  $F_{xy}$ ,  $F_r$  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 safety analyses. The limits are consistent with the safety analyses assumptions and have been analytically demonstrated adequate to maintain a minimum DNBR of  $\geq 1.20$ , in conjunction with ESCU methodology 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.

## **INSTRUMENTATION**

### **BASES**

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individual channels; and (2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded; and (3) sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," December 1980 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

#### **3/4.3.3.2 DELETED**

#### **3/4.3.3.3 DELETED**

#### **3/4.3.3.4. METEOROLOGICAL INSTRUMENTATION**

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data are available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public.

#### **3/4.3.3.5 REMOTE SHUTDOWN SYSTEM INSTRUMENTATION**

The OPERABILITY of the remote shutdown system instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of 10 CFR Part 50.

The OPERABILITY of the remote shutdown system instrumentation ensures that a fire will not preclude achieving safe shutdown. The remote shutdown system instrumentation, control circuits, and transfer switches are independent of areas where a fire could damage systems normally used to shut down the reactor. This capability is consistent with General Design Criterion 3 and Appendix R to 10 CFR Part 50.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 136 AND 75

TO FACILITY OPERATING LICENSE NO. DPR-67 AND NO. NPF-16

FLORIDA POWER AND LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

1.0 INTRODUCTION

By letter dated January 20, 1995, Florida Power & Light Company requested changes to the Technical Specifications (TS) for St. Lucie Units 1 and 2. These proposed changes would eliminate Technical Specification 3/4.3.3.2 and relocate the limitations on the use of the Incore Instrument System (ICI) to the St. Lucie Updated Final Safety Analysis Report (UFSAR) for each unit. Also, the uncertainty factors specified in Linear Heat Rate (LHR) Surveillance Requirement (SR) 4.2.1.4.b that are associated with the incore detector Local Power Density alarm setpoints will likewise be revised.

The ICI at St. Lucie Unit 1 consists of 45 neutron detector strings positioned in the center of selected fuel assemblies. St. Lucie Unit 2 has 56 similar neutron detector strings in the ICI. Each detector string consists of 4 rhodium neutron detector segments located at 20, 40, 60, and 80% of core height. The neutron flux indicated by the detector segments is processed by a full-core power distribution system to determine the peak linear heat rate, peak pin power, radial peaking factors, and azimuthal power tilt for comparison to the TS limits. Thus, the ICI is directly used to verify important safety parameters.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the Act) requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of the TS are set forth in 10 C.F.R. § 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement), 58 Fed. Reg. 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled

documents, consistent with the standard enunciated in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether a particular matter is required to be included in the TS, as follows:

Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4: A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

The Commission recently promulgated a proposed change to 10 CFR 50.36, pursuant to which the rule would be amended to codify and incorporate these criteria. See Proposed Rule, "Technical Specifications," 59 FR 48180 (September 20, 1994). As a result, existing TS requirements that fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements that do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

### 3.0 EVALUATION

#### 3.1 DESCRIPTION OF THE PROPOSED CHANGES

Section 3/4.3.3.2 - This section will be eliminated and the limitations on the use of the ICI System will be relocated to the Updated Final Safety Analysis Report (UFSAR).

Surveillance 4.2.1.4.b - Remove the uncertainty factors applied to the ICI System and relocate them to the UFSAR.

INDEX Pages IV and V - delete "Incore Detectors" and the associated page reference.

TS 4.10.2.2, 4.10.4.2 (St. Lucie Unit 2 only), and 4.10.5.2 will be revised to delete reference to TS 3.3.3.2 and include reference to TS 4.2.1.4 (LHR).

Bases Section 3/4.2.1 - Revise to delete the numerical values listed for the uncertainty allowances.

Bases Section 3/4.3.2 - replace with the word "DELETED."

### 3.2 GENERAL CONSIDERATIONS

The licensee provided an analysis of the proposed changes with regard to the above four criteria, as follows:

Criterion 1: The ICI provides no function that would indicate a degradation in the reactor coolant system boundary.

Criterion 2: The ICI is used to monitor certain core power distribution parameters, which are process variables as described above. The proposed change would not remove the limits for those parameters from the technical specifications. Rather, only the details associated with how the core power distribution is measured will be relocated to the UFSAR. Criterion 2 does not apply to the method of measuring a process variable.

Criterion 3: The ICI does not function to mitigate a Design Basis Accident or Transient.

Criterion 4: Operating experience of the St. Lucie units has not shown the ICI to be significant to public health and safety. The system is not among the systems, structures, or components that are included in the probabilistic safety assessment for either unit. Moreover, the ICI cannot be used to mitigate the consequences of any transient, nor does it otherwise perform a design function. Therefore, the existing TS requirements involving the ICI are considered not significant to the protection of public health and safety.

The staff has reviewed the licensee's analysis and agrees that the proposed changes do not meet the above listed four criteria and, therefore, the proposed relocations to the UFSAR are acceptable.

### 3.3 ADDITIONAL CONSIDERATIONS

Essentially all pressurized water reactors' TS contain a requirement for operability of 75% of the incore detector locations for mapping of the core power distribution. Incore detector data is used to calculate power peaking factors that are used to verify compliance with fuel performance limits.

While relocating the ICI operability requirements is not a concern, the changing of the number and/or distribution requirements is a concern.

The current TS 3.3.3.2. requires that 75% of all incore detector locations be operable and that a minimum of two quadrant symmetric incore detector be located per core quadrant. A minimum of three of the rhodium detectors on a detector string must be operable for the string to be operable. These requirements were established to ensure adequate core coverage. Changes to these requirements must be carefully reviewed and justification provided to specify how adequate core coverage would be maintained and how anomalies would be detected.

The licensee has stated that changes to the requirements on number and/or distribution of operable incore detectors will be evaluated under 10 CFR 50.59 or by license amendment.

Since any future changes to the requirements regarding the number and location of operable detectors will be done pursuant to 10 CFR 50.59, the staff believes that sufficient regulatory assurances are in place. Based on the above, the staff concludes that the proposed changes are acceptable.

The staff recommends that the following considerations be included in a 10 CFR 50.59 evaluation if changes to the requirements for the ICI are proposed:

- (1) how an inadvertent loading of a fuel assembly into an improper location will be detected;
- (2) how the validity of the tilt estimates will be ensured;
- (3) how adequate core coverage will be maintained;
- (4) how the measurement uncertainties will be assured and why the added uncertainties are adequate to guarantee that measured peak linear heat rates, peak pin powers radial peaking factors, and azimuthal power tilts will meet TS limits; and
- (5) how the ICI will be restored to full (or nearly full) service before the beginning of each cycle.

#### 4.0 TECHNICAL FINDINGS

Based on the evaluation in Section 3 above, the staff finds the proposed changes acceptable.

#### 5.0 STATE CONSULTATION

Based upon the written notice of the proposed amendments, the Florida State official had no comments.

## 6.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve 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 issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (60 FR 11132). Accordingly, these amendments meet 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 these amendments.

## 7.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: M. Chatterton

Date: June 6, 1995