DISTRIBUTION
attached sheet

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: ADMINISTRATIVE CHANGES (TAC NOS. M90782 AND M90783)

Dear Mr. Goldberg:

The Commission has issued the enclosed Amendment Nos. 134 and 73 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 October 27, 1994.

These administrative amendments correct editorial errors, remove deleted pages, clarify confusing statements and eliminate inconsistencies identified by the plant operations staff.

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-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosures:
1. Amendment No. 134 to DPR-67
2. Amendment No. 73 to NPF-16
3. Safety Evaluation

cc w/enclosures:
See next page

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DATE	3/1/95	3/2/95	3/14/95	3/3/95	
COPY	Yes/No	Yes/No	Yes/No	Yes/No	

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DATED: March 15, 1995

AMENDMENT NO. 134 TO FACILITY OPERATING LICENSE NO. DPR-67 - ST. LUCIE, UNIT 1
AMENDMENT NO. 73 TO FACILITY OPERATING LICENSE NO. NPF-16 - ST. LUCIE, UNIT 2

Docket File
NRC & Local PDRs
PDII-2 Reading
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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. 134
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 October 27, 1994, 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, 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. 134 , 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

DBMatthews

David B. Matthews, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 15, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 134

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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V	V
VI	VI
VII	VII
IX	IX
X	X
XI	XI
XII	XII
XIII	XIII
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Thermal Margin/Low Pressure

The Thermal Margin/Low Pressure trip is provided to prevent operation when the DNBR is less than the DNBR limit.

The trip is initiated whenever the reactor coolant system pressure signal drops below either 1887 psia or a computed value as described below, whichever is higher. The computed value is a function of the higher of ΔT power or neutron power, reactor inlet temperature, the number of reactor coolant pumps operating and the AXIAL SHAPE INDEX. The minimum value of reactor coolant flow rate, the maximum AZIMUTHAL POWER TILT and the maximum CEA deviation permitted for continuous operation are assumed in the generation of this trip function. In addition, CEA group sequencing in accordance with Specifications 3.1.3.5 and 3.1.3.6 is assumed. Finally, the maximum insertion of CEA banks which can occur during any anticipated operational occurrence prior to a Power Level-High trip is assumed.

The Thermal Margin/Low Pressure trip setpoints include appropriate allowances for equipment response time, calculational and measurement uncertainties, and processing error. A further allowance is included to compensate for the time delay associated with providing effective termination of the occurrence that exhibits the most rapid decrease in margin to the DNBR limit.

Asymmetric Steam Generator Transient Protective Trip Function (ASGTPTF)

The ASGTPTF consists of Steam Generator pressure inputs to the TM/LP calculator, which causes a reactor trip when the difference in pressure between the two steam generators exceeds the trip setpoint. The ASGTPTF is designed to provide a reactor trip for those events associated with secondary system malfunctions which result in asymmetric primary loop coolant temperatures. The most limiting event is the loss of load to one steam generator caused by a single main steam isolation valve closure.

The equipment trip setpoint and allowable values are calculated to account for instrument uncertainties, and will ensure a trip at or before reaching the analysis setpoint.

Loss of Turbine

A Loss of Turbine trip causes a direct reactor trip when operating above 15% of RATED THERMAL POWER. This trip provides turbine protection, reduces the severity of the ensuing transient and helps avoid the lifting of the main steam line safety valves during the ensuing transient, thus extending the service life of these valves. No credit was taken in the accident analyses for operation of this trip. Its functional capability at the specified trip setting is required to enhance the overall reliability of the Reactor Protection System.

Rate of Change of Power-High

The Rate of Change of Power-High trip is provided to protect the core during startup operations and its use serves as a backup to the administratively enforced startup rate limit. Its trip setpoint does not correspond to a Safety Limit and no credit was taken in the accident analyses for operation of this trip. Its functional capability at the specified trip setting is required to enhance the overall reliability of the Reactor Protection System.

SURVEILLANCE REQUIREMENTS (Continued)

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_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 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 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.

TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM SETPOINT	MEASUREMENT RANGE	ACTION
1. AREA MONITORS					
a. Fuel Storage Pool Area	1	*	≤ 15 mR/hr	10^{-1} - 10^{4} mR/hr	13
b. Containment (CIS)	3	6	≤ 90 mR/hr	1 - 10^{5} mR/hr	16
c. Containment Area - Hi Range	1	1, 2, 3 & 4	≤ 10 R/hr	1 - 10^{7} R/hr	15
2. PROCESS MONITORS					
a. Containment					
i. Gaseous Activity RCS Leakage Detection	1	1, 2, 3 & 4	Not Applicable	10 - 10^{6} cpm	14
ii. Particulate Activity RCS Leakage Detection	1	1, 2, 3 & 4	Not Applicable	10 - 10^{6} cpm	14
b. Fuel Storage Pool Area Ventilation System					
i. Gaseous Activity	1	**	***	10^{-7} - 10^{5} μCi/cc	12
ii. Particulate Activity	1	**	***	1 - 10^{6} cpm	12

*With fuel in the storage pool or building.
**With irradiated fuel in the storage pool or whenever there is fuel movement within the pool or crane operation with loads over the storage pool.
***The Alarm Setpoints are determined and set in accordance with requirements of the Offsite Dose Calculation Manual.

INSTRUMENTATION

INCORE DETECTORS

LIMITING CONDITION FOR OPERATION

3.3.3.2 The incore detection system shall be OPERABLE with:

a. At least 75% of all incore detector locations, and

b. A minimum of two quadrant symmetric incore detector locations per core quadrant.

An OPERABLE incore detector location shall consist of a fuel assembly containing a fixed detector string with a minimum of three OPERABLE rhodium detectors.

APPLICABILITY: When the incore detection system is used for:

a. Recalibration of the excore axial flux offset detection system,

b. Monitoring the AZIMUTHAL POWER TILT,

c. Calibration of the power level neutron flux channels, or

d. Monitoring the linear heat rate.

ACTION:

With the incore detection system inoperable, do not use the system for the above applicable monitoring or calibration functions. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.2 The incore detection system shall be demonstrated OPERABLE:

a. **By performance of a CHANNEL CHECK within 7 days prior to its use when required for:**

1. Recalibration of the excore axial flux offset detection system,

2. Monitoring the linear heat rate pursuant to Specification 4.2.1.4,

Pages 3/4 3-38 through 3/4 3-40 (Amendment No. 115) have been deleted from the Technical Specifications. The next page is 3/4 3-41.

TABLE 3.3-11 (Continued)

ACTION STATEMENTS

ACTION 1 - With the number of OPERABLE channels less than required by Table 3.3-11, either restore the inoperable channel(s) to OPERABLE status within 30 days or be in HOT STANDBY within the next 12 hours.

ACTION 2 - With position indication inoperable, restore the inoperable indicator to OPERABLE status or close the associated PORV block valve and remove power from its operator within 48 hours or be in HOT STANDBY within the next 6 hours.

ACTION 3 - With any individual valve position indicator inoperable, obtain quench tank temperature, level and pressure information once per shift to determine valve position.

ACTION 4 - With the number of OPERABLE Channels one less than the Total Number of Channels shown in Table 3.3-11, either restore the inoperable channel to OPERABLE status within 7 days if repairs are feasible without shutting down or prepare and submit a Special Report to the Commission pursuant to the specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 5 - With the number of OPERABLE Channels less than the Minimum Channels OPERABLE requirements of Table 3.3-11, either restore the inoperable channel(s) to OPERABLE status within 48 hours if repairs are feasible without shutting down or:

1. Initiate an alternate method of monitoring the reactor vessel inventory; and

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status; and

3. Restore the Channel to OPERABLE status at the next scheduled refueling.

TABLE 4.3-7

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1. Pressurizer Water Level	M	R
2. Auxiliary Feedwater Flow Rate	M	R
3. Reactor Coolant System Subcooling Margin Monitor	M	R
4. PORV Position Indicator	M	R
5. PORV Block Valve Position Indicator	M	R
6. Safety Valve Position Indicator	M	R
7. Incore Thermocouples	M	R
8. Containment Sump Water Level (Narrow Range)	M	R
9. Containment Sump Water Level	M	R
10. Reactor Vessel Level Monitoring System	M	R
11. Containment Pressure	M	R

Pages 3/4 3-46 through 3/4 3-49 (Amendment No. 123) have been deleted from the Technical Specifications. The next page is 3/4 3-50.

TABLE 3.3-13

EXPLOSIVE GAS MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1. WASTE GAS DECAY TANKS EXPLOSIVE GAS MONITORING SYSTEM			
a. Oxygen Monitors	1	*	1

TABLE NOTATION

* During waste gas system operation.

ACTION 1 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, operation of this system may continue for up to 30 days provided samples of O_2 are analyzed by the lab gas partitioner at least once per 24 hours.

TABLE 4.3-9

EXPLOSIVE GAS MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1. WASTE GAS DECAY TANKS EXPLOSIVE GAS MONITORING SYSTEM					
a. Oxygen Monitor	D		Q(1)	M	*
b. Oxygen Monitor (alternate)	D		Q(1)	M	*

TABLE NOTATION

* During waste gas holdup system operation.

(1) The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:

1. One volume percent oxygen, balance nitrogen, and
2. Four volume percent oxygen, balance nitrogen.

SURVEILLANCE REQUIREMENTS (Continued)

Pages 3/4 4-28 through 3/4 4-55 (Amendment No. 90), and Pages 3/4 4-56 through 3/4 4-57 (Amendment No. 80) have been deleted from the Technical Specifications. The next page is 3/4 4-58.

MAIN STEAM LINE ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.5 Each main steam line isolation valve shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

MODE 1 - With one main steam line isolation valve inoperable, POWER OPERATION may continue provided the inoperable valve is either restored to OPERABLE status or closed within 4 hours; otherwise, be in HOT STANDBY within the next 6 hours.

MODES 2 and 3 - With one or both main steam isolation valve(s) inoperable, subsequent operation in MODES 2 or 3 may proceed provided the isolation valve(s) is (are) maintained closed. Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 24 hours.

The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.5 Each main steam line isolation valve that is open shall be demonstrated OPERABLE by verifying full closure within 6.0 seconds when tested pursuant to Specification 4.0.5.

Pages 3/4 7-11 through 3/4 7-12 (Amendment No. 86) have been deleted from the Technical Specifications. The next page is 3/4 7-13.

Pages 3/4 11-2 through 3/4 11-13 (Amendment No. 123) have been deleted from the Technical Specifications. The next page is 3/4 11-14.

3/4.7.1 TURBINE CYCLE

3/4.7.1.1 SAFETY VALVES

The OPERABILITY of the main steam line code safety valves ensures that the secondary system pressure will be limited to within **110% of its design** pressure of **1000 psia** during the most severe anticipated system operational transient. The maximum relieving capacity is associated with a turbine trip from 100% RATED THERMAL POWER coincident with an assumed loss of condenser heat sink (i.e., no steam bypass to the condenser).

The specified valve lift settings and relieving capacities are in accordance with the requirements of Section III of the ASME Boiler and Pressure Code, 1971 Edition and ASME Code for Pumps and Valves, Class II. The total relieving capacity for all valves on all of the steam lines is 12.38×10^6 lbs/hr which is 102.8 percent the total secondary steam flow of 12.04×10^6 lbs/hr at 100% RATED THERMAL POWER. A minimum of 2 OPERABLE safety valves per steam generator ensures that sufficient relieving capacity is available for removing decay heat.

STARTUP and/or POWER OPERATION is allowable with safety valves inoperable within the limitations of the ACTION requirements on the basis of the reduction in secondary system steam flow and THERMAL POWER required by the reduced reactor trip settings of the Power Level-High channels. The reactor trip setpoint reductions are derived on the following bases:

For two loop operation

$$SP = \frac{(X) - (Y)(V)}{X} \times (106.5)$$

where:

SP = reduced reactor trip setpoint in percent of RATED THERMAL POWER

V = maximum number of inoperable safety valves per steam line

106.5 = Power Level-High Trip Setpoint for two loop operation

X = Total relieving capacity of all safety valves per steam line in lbs/hour (6.192×10^6 lbs/hr.)

Y = Maximum relieving capacity of any one safety valve in lbs/hour (7.74×10^5 lbs/hr.)

3/4.7.1.2 AUXILIARY FEEDWATER PUMPS

The OPERABILITY of the auxiliary feedwater pumps ensures that the Reactor Coolant System can be cooled down to less than 325°F from normal operating conditions in the event of a total loss of off-site power.

Any two of the three auxiliary feedwater pumps have the required capacity to provide sufficient feedwater flow to remove reactor decay heat and reduce the RCS temperature to 325°F where the shutdown cooling system may be placed into operation for continued cooldown.

3/4.7.1.3 CONDENSATE STORAGE TANK

The OPERABILITY of the condensate storage tank with the minimum water volume ensures that sufficient water is available for cooldown of the Reactor Coolant System to less than 325°F in the event of a total loss of off-site power. The minimum water volume is sufficient to maintain the RCS at HOT STANDBY conditions for 8 hours with steam discharge to atmosphere.

3/4.7.1.4 ACTIVITY

The limitations on secondary system specific activity ensure that the resultant off-site radiation dose will be limited to a small fraction of 10 CFR Part 100 limits in the event of a steam line rupture. The dose calculations for an assumed steam line rupture include the effects of a coincident 1.0 GPM primary to secondary tube leak in the steam generator of the affected steam line and a concurrent loss of offsite electrical power. These values are consistent with the assumptions used in the accident analyses.

Pages B 3/4 11-2 through B 3/4 11-3 (Amendment No. 123) have been deleted from the Technical Specifications. The next page is B 3/4 11-4.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 134 AND 73

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 October 27, 1994, Florida Power & Light Company (FPL, the licensee) requested various changes to the Technical Specifications (TS) for the St. Lucie Plant, Unit Nos. 1 and 2. The licensee proposed to make administrative changes to achieve consistency throughout TS by removing outdated material, removing deleted pages, making minor text changes for purposes of clarification, making editorial corrections and resolving inconsistencies identified by plant operations staff.

2.0 DESCRIPTION AND EVALUATION

2.1 ST. LUCIE UNIT 1

a. The following changes in text will improve consistency within the Unit 1 TS by revising and/or deleting outdated material, providing proper references, and correcting spelling and/or nomenclature errors.

(1) On Page Ia: Add "TABLE 1.1 Frequency Notation ... 1-8" and "TABLE 1.2 Operational Modes ... 1-9." The location of these topics is not otherwise identified in the index.

(2) On Page III:

a) Under 3/4.1 REACTIVITY CONTROL SYSTEMS, revise "Shutdown Margin - T_{axg} > 200 °F" to read, "Shutdown Margin - T_{avg} > 200 °F" and thereby reflect the proper subscript for average temperature.

b) Under 3/4.1.2 BORATION SYSTEMS, revise the page reference for "Borated Water Sources - Operating" from "3/4 1-4" to read "3/4 1-18."

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(3) On Page IV: Under 3/4.3 INSTRUMENTATION, **delete** "Fire Detection Instrumentation ... 3/4 3-37".

This TS was deleted by Amendment 115.

(4) On Page V, under 3/4.4.10 STRUCTURAL INTEGRITY:

a) **Revise** "Safety Class 1 Components" to read, "ASME Code Class 1, 2, and 3 Components."

b) **Delete** "Safety Class 2 Components ... 3/4 4-37" and "Safety Class 3 Components ... 3/4 4-53."

These requirements were merged into one specification pursuant to Amendment 90.

(5) On Page VI: Under 3/4.7 PLANT SYSTEMS, **delete** "Secondary Water Chemistry ... 3/4 7-10."

This TS was deleted by Amendment 86.

(6) On Page VII:

a) **Delete** the entire section, "3/4.7.11 FIRE SUPPRESSION SYSTEMS" and the referenced pages.

b) **Delete** "3/4.7.12 PENETRATION FIRE BARRIERS ... 3/4 7-45."

The specifications were deleted by Amendment 115.

(7) On Page IX: For Bases Section 3/4.2.2, **replace** the words "TOTAL PLANAR RADIAL PEAKING FACTOR" with the word, "DELETED."

This TS and its bases were deleted by Amendment 109.

(8) On Page X: For Bases Section 3/4.5.4, **revise** "REFUELING WATER STORAGE TANK (RWST)" to read, "REFUELING WATER TANK (RWT)."

The proposed wording reflects the proper nomenclature for Unit 1 and is consistent with both the TS and the Bases Section for this system.

(9) On Page XI:

a) **Delete** "3/4.7.11 FIRE SUPPRESSION SYSTEMS...B 3/4 7-7."

b) **Delete** "3/4.7.12 PENETRATION FIRE BARRIERS ... B 3/4 7-7."

The Bases sections were deleted by Amendment 115.

(10) On Page XII:

a) Under 3/4.11 RADIOACTIVE EFFLUENTS:

i) **Replace** "LIQUID EFFLUENTS" with the word "DELETED."
ii) **Replace** "3/4.11.2 GASEOUS EFFLUENTS ... B 3/4 11.2" with "3/4.11.2.5 EXPLOSIVE GAS MIXTURE ... B 3/4 11-4."
iii) **Replace** "3/4.11.3 SOLID RADIOACTIVE WASTE" with "3/4.11.2.6 GAS STORAGE TANKS".
iv) **Delete** "3/4.11.4 TOTAL DOSE ... B 3/4 11-5."

b) **Delete** the entire section 3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING.

The Bases sections were revised by Amendment 123.

(11) On Pages XIII, XIV, and XV: **Revise** the page references as indicated.

The topics do not appear on the pages presently indicated.

(12) On Page 3/4 2-2: In the footnote #, **revise** "core" to read "incore" and the referenced Specification "4.2.1" to read "4.2.1.3".

The proposed changes will correct the footnote to reflect the proper system nomenclature and the appropriate reference specification. Unit 1 has no TS number 4.2.1; and if the incore system is inoperable, linear heat rate would be monitored by the excore system per TS 4.2.1.3.

(13) On Page 3/4 3-25, Surveillance Requirement 4.3.3.2.a.2: **Revise** the reference specification "4.2.1.3" to read "4.2.1.4."

The proposed change rectifies an improper reference. TS 4.2.1.4 is the proper reference for the incore monitoring system.

(14) On Page 3/4 3-44, TABLE 4.3-7: In item 6, **revise** "postition" to properly read "position."

b. The following reorganization of text will restore coherency to the tabular format of TS 3/4.3.3.10.

(1) On Page 3/4 3-51, TABLE 3.3-13: **Incorporate** all of the TABLE NOTATION text that is currently printed on Page 3/4 3-53 (Amendment 123).

TABLE 3.3-13 was fragmented as a result of deletions made pursuant to Amendment 123. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format.

(2) On Page 3/4 3-52: **Delete** the word "DELETED". On this page, **incorporate** all of the TABLE 4.3-9 text that is currently printed on page 3/4 3-54 (Amendment 123), and all of the associated TABLE NOTATION text that is currently printed on Page 3/4 3-56 (Amendment 123).

TABLE 4.3-9 was fragmented as a result of deletions made pursuant to Amendment 123. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format. Printing TABLE 4.3-9 in its entirety on page 3/4 3-52 will facilitate deletion of blank pages without interrupting the continuity of pagination, per item 1.d.(3) below.

c. The following changes in text will provide accountability for the applicable pages listed in section 1.d that FPL has selected for deletion from the technical specifications.

(1) On Page 3/4 3-37: **Replace** the word "DELETED" with the text, "Pages 3/4 3-38 through 3/4 3-40 (Amendment No. 115) have been deleted from the Technical Specifications."

(2) On Page 3/4 3-45: **Replace** the word "DELETED" with the text, "Pages 3/4 3-46 through 3/4 3-49 (Amendment No. 123) have been deleted from the Technical Specifications"

(3) On Page 3/4 4-27: **Replace** the word "DELETED" with the text, "Pages 3/4 4-28 through 3/4 4-55 (Amendment No. 90), and Pages 3/4 4-56 through 3/4 4-57 (Amendment No. 80) have been deleted from the Technical Specifications."

(4) On Page 3/4 7-10: **Replace** the words "THIS PAGE LEFT INTENTIONALLY BLANK" with the text, "Pages 3/4 7-11 through 3/4 7-12 (Amendment No. 86) have been deleted from the Technical Specifications."

(5) On Page 3/4 11-1: **Replace** the word "DELETED" with the text, "Pages 3/4 11-2 through 3/4 11-13 (Amendment No. 123) have been deleted from the Technical Specifications."

(6) On Page B 3/4 11-1: **Add** the words, "Pages B 3/4 11-2 through B 3/4 11-3 (Amendment No. 123) have been deleted from the Technical Specifications."

The text proposed in each of the above items will preserve the continuity of pagination. The pages that are referred to in the text are blank, and will be removed from the TS.

d. FPL proposes to delete the following blank pages from the Unit 1 Technical Specifications.

(1) Delete pages 3/4 3-38 through 3/4 3-40 (Amendment 115).

(2) Delete pages 3/4 3-46 through 3/4 3-49 (Amendment 123).

(3) *Delete pages 3/4 3-53 through 3/4 3-56 (Amendment 123). The existing text on pages 3/4 3-54 and 3/4 3-56 will appear on page 3/4 3-52 per item 1.b.(2) above.

(4) Delete pages 3/4 4-28 through 3/4 4-55 (Amendment 90) and pages 3/4 4-56 through 3/4 4-57 (Amendment 80).

(5) Delete pages 3/4 7-11 through 3/4 7-12 (Amendment 86).

(6) *Delete pages 3/4 7-32 through 3/4 7-39a (Amendment 83).

(7) Delete pages 3/4 11-2 through 3/4 11-13 (Amendment 123).

(8) *Delete pages 3/4 11-16 through 3/4 11-17 (Amendment 123)

(9) *Delete pages 3/4 12-1 through 3/4 12-12 (Amendment 123).

(10) Delete pages B 3/4 11-2 through B 3/4 11-3 (Amendment 123).

(11) *Delete pages B 3/4 12-1 through B 3/4 12-2 (Amendment 123).

Except as noted by *, continuity of pagination will be preserved by a note on the page immediately preceding each page group as proposed in section 1.c above.

* Pages denoted by a single asterisk are the last pages in the applicable TS section, and deletion of these pages will not interrupt the page numbering sequence.

e. The following changes in text will rectify errors in the stated ranges for the Unit 1 Radioactivity RCS Leakage Detection instruments listed in TABLE 3.3-6.

On Page 3/4 3-22, TABLE 3.3-6:

(1) For item 2.a.i, Gaseous Activity RCS Leakage Detection, change the indicated MEASUREMENT RANGE from "10^{-7} - 10^{-2} μCi/cc" to properly read, "10 - 10^{6} cpm."

(2) For item 2.a.ii, Particulate Activity RCS Leakage Detection, <u>change</u> the indicated MEASUREMENT RANGE from "1 - 10^6 cpm/hr" to properly read, "10 - 10^6 cpm."

The ratemeters for both of the above listed instruments have measurement ranges of 10 - 10^6 cpm. The ranges currently listed in TABLE 3.3-6 for these instruments are the result of an inadvertent revision made pursuant to Amendment 59, which incorporated Radiological Effluent Technical Specifications for Unit 1 modeled as close as practicable to those of Unit 2. This proposed change will rectify that error by restoring the listed measurement ranges to their original values which are consistent with the Unit 1 plant configuration.

f. The following minor change in text will correct errors in the stated secondary system design pressure and the basis for operability of Main Steam Safety Valves found in Bases Section 3/4.7.1.

On <u>Page B 3/4 7-1, under Section 3/4.7.1.1 SAFETY VALVES</u>: In the first sentence, <u>revise</u> "...limited to within its design pressure of 1025 psig..." to read, "...limited to within 110% of its design pressure of 1000 psia..."

The Unit 1 steam generator design pressure is 1000 psia. The plant safety analyses demonstrate that the existing lift setpoints for the safety valves satisfy the acceptance criteria by limiting steam generator pressure to less than 110% of design during the postulated worst case over-pressurization transient. The proposed change in text will more accurately reflect the Bases for TS 3/4.7.1.1.

g. The following minor change in text will correct an error in the stated Bases for the Unit 1 Thermal Margin/Low Pressure (TM/LP) trip setpoints.

On <u>Page B 2-7</u>, under <u>Thermal Margin/Low Pressure</u>: <u>Delete</u> "of 30 psia" from the second sentence of paragraph 3.

The bases presently state that an allowance of 30 psia is included in the TM/LP trip setpoint to compensate for the time delay associated with effective termination of the event that exhibits the most rapid decrease in margin to the DNBR limit. This pressure bias has been superseded and is incorrect, e.g., a value of 42 psia was established for this allowance as part of the core reload safety analyses for Unit 1 Cycle 11.

Simply deleting the specific numerical value from the text will both rectify the existing error and preclude the need for an amendment to the Bases section each time this parameter is adjusted. Concurrently, the syntax of this sentence will be more consistent with the context of the

third paragraph in that only the types of setpoint allowances are identified.

2.2 ST LUCIE UNIT 2

a. The following changes in text will improve consistency within the Unit 2 TS by revising and/or deleting outdated material, providing proper references, and correcting spelling and/or nomenclature errors.

(1) On Page V: Under 3/4.3 INSTRUMENTATION, **delete** "FIRE DETECTION INSTRUMENTATION ... 3/4 3-44."

This TS was deleted by Amendment 55.

(2) On Page VIII:

a) **Delete** the entire section "3/4.7.11 FIRE SUPPRESSION SYSTEMS" and the referenced pages.

b) **Delete** "3/4.7.12 FIRE RATED ASSEMBLIES ... 3/4 7-39."

The specifications were deleted by Amendment 55.

(3) On Page X:

a) **Delete** "3/4.11 RADIOACTIVE EFFLUENTS"

b) **Delete** "3/4.12 GASEOUS EFFLUENTS"

c) **Add** the appropriate SECTION number "3/4.11.2.5" preceding EXPLOSIVE GAS MIXTURE, and "3/4.11.2.6" preceding GAS STORAGE TANKS.

The revisions will make the Index consistent with TS changes implemented pursuant to Amendment 61.

(4) On Page XIV:

a) **Delete** "3/4.7.11 FIRE SUPPRESSION SYSTEMS...B 3/4 7-7"

b) **Delete** "3/4.7.12 FIRE RATED ASSEMBLIES...B 3/4 7-8"

The Bases sections were deleted pursuant to Amendment 55.

(5) On Page XVI:

a) Under 3/4.11 RADIOACTIVE EFFLUENTS

i) **Delete** "3/4.11.1 LIQUID EFFLUENTS...B 3/4 11-1."
ii) **Replace** "3/4.11.2 GASEOUS EFFLUENTS...B 3/4 11-2" with "3/4.11.2.5 EXPLOSIVE GAS MIXTURE ... B 3/4 11-4."
iii) **Replace** "3/4.11.3 SOLID RADIOACTIVE WASTE" with "3/4.11.2.6 GAS STORAGE TANKS."
iv) **Delete** "3/4.11.4 TOTAL DOSE ... B 3/4 11-5."

b) **Delete** the entire section "3/4.12 RADIOACTIVE ENVIRONMENTAL MONITORING" and the referenced pages.

The Bases sections were changed pursuant to Amendment 61.

(6) On Pages XVIII and XXI: **Revise** the page references as indicated.

The topics do not appear on the pages presently indicated.

(7) On Page XXIII:

a) For TABLE 3.3-2, **replace** "REACTOR PROTECTIVE INSTRUMENTATION RESPONSE TIMES ... 3/4 3-6" with the word "DELETED"

b) For TABLE 3.3-5, **replace** "ENGINEERED SAFETY FEATURES RESPONSE TIMES ... 3/4 3-19" with the word "DELETED"

The tables were removed from the TS per Amendment 67.

(8) On Page XXIV:

a) For TABLE 3.3-11, **replace** "FIRE DETECTION INSTRUMENTS ... 3/4 3-45" with the word "DELETED." This table was deleted by Amendment 55.

b) For TABLE 3.3-12, **replace** "RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION ... 3/4 3-49" with the word "DELETED."

This table was deleted by Amendment 61.

c) For TABLE 4.3-8, **replace** "RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION...3/4 3-51" with the word "DELETED."

This table was deleted by Amendment 61.

d) For TABLE 3.3-13, **replace** "RADIOACTIVE GASEOUS EFFLUENT" with the words "EXPLOSIVE GAS."

This table was revised by Amendment 61.

e) For TABLE 4.3-9, **replace** "RADIOACTIVE GASEOUS EFFLUENT" with the words "EXPLOSIVE GAS," and **revise** the reference page "3/4 3-57" to read "3/4 3-55."

The table content was revised by Amendment 61, and the reference page for TABLE 4.3-9 will change as proposed in section b.(2) below.

(9) On Page XXV:

a) For TABLE 3.7-4, **replace** "FIRE HOSE STATIONS ... 3/4 7-36" with the word "DELETED."

This table was deleted by Amendment 55.

b) For TABLE 3.7-5, **replace** "YARD FIRE HYDRANTS AND ASSOCIATED HYDRANT HOSE HOUSES ... 3/4 7-38" with the word "DELETED."

This table was deleted by Amendment 55.

c) For each of the following tables, **replace** the title and associated reference page with the word "DELETED." The tables were deleted from the TS by Amendment 61.

i) TABLE 4.11-1, "RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM...3/4 11-2"
ii) TABLE 4.11-2, "RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM...3/4 11-8"
iii) TABLE 3.12-1, "RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM...3/4 12-3"
iv) TABLE 3.12-2, "REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES...3/4 12-7"
v) TABLE 4.12-1, "DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS...3/4 12-8"

(10) On Page 3/4 3-30, Surveillance Requirement 4.3.3.2.a.2: **Revise** the reference Specification "4.2.1.3" to read, "4.2.1.4."

The proposed change rectifies an improper reference. TS 4.2.1.4 is the proper reference for the incore monitoring system.

(11) On Page 3/4 3-43, TABLE 4.3-7: **Renumber** the Containment Sump Water Level (Narrow Range) instrument as item "15."

The table lists item 16 twice.

b. The following reorganization of text will restore coherency to the tabular format of TS 3/4.3.3.10.

(1) On Page 3/4 3-54, TABLE 3.3-13: As shown in Attachment 4 to this submittal, **incorporate** all of the TABLE NOTATION text that is currently printed on Page 3/4 3-56 (Amendment 61).

TABLE.3.3-13 was fragmented as a result of deletions made pursuant to Amendment 61. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format.

(2) On Page 3/4 3-55: **Delete** the word "DELETED". On this page as shown in Attachment 4 to this submittal, **incorporate** all of the TABLE 4.3-9 text that is currently printed on page 3/4 3-57 (Amendment 61), and all of the associated TABLE NOTATION text that is currently printed on Page 3/4 3-59 (Amendment 61).

TABLE 4.3-9 was fragmented as a result of deletions made pursuant to Amendment 61. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format. Printing TABLE 4.3-9 in its entirety on page 3/4 3-55 will facilitate deletion of blank pages as described in item 2.d.(3) below.

c. The following changes in text will provide accountability for the applicable pages listed in section 2.d that FPL has selected for deletion from the technical specifications.

(1) On Page 3/4 3-44: **Replace** the word "DELETED" with the text, "Pages 3/4 3-45 through 3/4 3-46 (Amendment 55) have been deleted from the Technical Specifications."

(2) On Page 3/4 3-48: **Replace** the word "DELETED" with the text, "Pages 3/4 3-49 through 3/4 3-52 (Amendment 61) have been deleted from the Technical Specifications."

(3) On Page 3/4 3-56: **Delete** the existing text, and **add** the statement, "Pages 3/4 3-57 through 3/4 3-59 (Amendment 61) have been deleted from the Technical Specifications." (The text presently printed on page 3/4 3-56 will be relocated to page 3/4 3-54 per 2.b.(1) above).

(4) On Page 3/4 11-1: **Replace** the word "DELETED" with the text, "Pages 3/4 11-2 through 3/4 11-13 (Amendment 61) have been deleted from the Technical Specifications."

(5) On Page B 3/4 11-1: **Add** the text, "Pages B 3/4 11-2 through B 3/4 11-3 (Amendment 61) have been deleted from the Technical Specifications."

The text proposed in each of the above items will preserve the continuity of pagination. The pages that are referred to in the text will be removed from the TS.

d. FPL proposes to **delete** the following pages from the Unit 2 Technical Specifications.

(1) **Delete** pages 3/4 3-45 through 3/4 3-46 (Amendment 55).

(2) **Delete** pages 3/4 3-49 through 3/4 3-52 (Amendment 61).

(3) ****Delete** pages 3/4 3-57 through 3/4 3-59 (Amendment 61).

(4) **Delete** pages 3/4 11-2 through 3/4 11-13 (Amendment 61).

(5) ***Delete** pages 3/4 11-16 through 3/4 11-17 (Amendment 61).

(6) ***Delete** pages 3/4 12-1 through 3/4 12-12 (Amendment 61).

(7) ***Delete** page B 3/4 2-3 (Amendment 8).

(8) **Delete** pages B 3/4 11-2 through B 3/4 11-3 (Amendment 61)

(9) ***Delete** pages B 3/4 12-1 through B 3/4 12-2 (Amendment 61).

(10) ***Delete** page 6-24 (Amendment 61).

Except as noted by *, continuity of pagination will be preserved by a note on the page immediately preceding each page group as proposed in section 2.c above.

* Pages denoted by a single asterisk are the last pages in the applicable TS section, and deletion of these pages will not interrupt the page numbering sequence.

** The existing text on Pages 3/4 3-57 and 3/4 3-59 will appear on page 3/4 3-55 per item 2.b.(2) above.

e. The following changes in text will rectify errors in nomenclature relevant to the Auxiliary Feedwater Actuation System (AFAS); will correct errors of omission involving multiple functional units of the Reactor Protection System (RPS) and the Engineered Safeguards Actuation

System (ESFAS) that would be affected by an inoperable process measurement circuit; and will improve consistency in Unit 2 TS format.

(1) On Page 3/4 3-4, TABLE 3.3-1, ACTION 2:

a) For Process Measurement Circuit 2, "Pressurizer Pressure - High:"

i) **Delete** the modifier " - High" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

ii) **Add** the functional unit "Pressurizer Pressure-Low (ESF)" to the Functional Unit Bypassed column.

The pressurizer pressure process measurement circuit provides data to both the RPS and the Safety Injection Actuation Signal (SIAS) of the ESFAS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 2. In addition, cross-referencing the two systems (RPS, ESF) for this parameter is consistent with the format of corresponding Table 3.3-3 for the ESFAS.

b) For Process Measurement Circuit 3, "Containment Pressure - High," **delete** the modifier " - High" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

c) For Process Measurement Circuit 4, "Steam Generator Pressure - Low:"

i) **Delete** the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

ii) Delete functional unit "Steam Generator ΔP 1 and 2 (AFAS 1 and 2)" from the Functional Unit Bypassed column, and add functional unit "AFAS-1 and AFAS-2 (AFAS)."

The Steam Generator ΔP function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for Unit 2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the Unit 2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 2.

iii) Add functional unit "Steam Generator Pressure-Low (ESF)" to the Functional Unit Bypassed column.

The steam generator pressure process measurement circuit provides data to both the RPS and the Main Steam Isolation Signal (MSIS) of the ESFAS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 2. In addition, cross-referencing the two systems (RPS, ESF) for this parameter is consistent with the format of corresponding Table 3.3-3 for the ESFAS.

d) For Process Measurement Circuit 5, "Steam Generator Level:"

i) Delete functional unit "Steam Generator ΔP (AFAS)" from the Functional Unit Bypassed column, and
ii) Add functional unit "If SG-2A, then AFAS-1 (AFAS)", and
iii) Add functional unit "If SG-2B, then AFAS-2 (AFAS)."

The Steam Generator ΔP function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for Unit 2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the Unit 2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 2.

The steam generator (SG) level process measurement circuits do not have cross-train functions within the AFAS. Thus, if the level measurement circuit for SG-2A is inoperable, only

the corresponding AFAS-1 would be affected. Likewise, if the level measurement circuit for SG-2B is inoperable, only AFAS-2 would be affected. The proposed wording clarifies the required action and is consistent with the Unit 2-AFAS configuration.

(2) On Page 3/4 3-15, TABLE 3.3-3, ACTION 13:

a) For Process Measurement Circuit 1, "Containment Pressure - High," **delete** the modifier " - High" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

b) For Process Measurement Circuit 2, "Steam Generator Pressure - Low:"

i) **Delete** the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

ii) **Delete** functional unit "Steam Generator ΔP 1 and 2 (AFAS)" from the Functional Unit Bypassed column, and **add** functional unit "AFAS-1 and AFAS-2 (AFAS)."

The Steam Generator ΔP function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for Unit 2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the Unit 2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 13.

iii) **Add** functional unit "Steam Generator Pressure-Low (RPS)" to the Functional Unit Bypassed column.

The steam generator pressure process measurement circuit provides data to both the Main Steam Isolation Signal (MSIS) of the ESFAS, and the RPS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 13. In addition, cross-referencing the two systems (ESF, RPS) for this parameter is consistent with the format of corresponding Table 3.3-1 for the RPS.

c) For Process Measurement Circuit 3, "Steam Generator Level:"

i) **Delete** "Steam Generator Level-Low (AFAS, RPS)" from the Functional Unit Bypassed column, and
ii) **Add** "Steam Generator Level-Low (RPS)", and
iii) **Add** "If SG-2A, then AFAS-1 (AFAS)", and
iv) **Add** "If SG-2B, then AFAS-2 (AFAS)."

The steam generator (SG) level process measurement circuits do not have cross-train functions within the AFAS. Thus, if the level measurement circuit for SG-2A is inoperable, only the corresponding AFAS-1 would be affected. Likewise, if the level measurement circuit for SG-2B is inoperable, only AFAS-2 would be affected. The proposed wording clarifies the required action and is consistent with the Unit 2 AFAS configuration.

(3) On Page 3/4 3-16, TABLE 3.3-3, ACTION 14:

a) For Process Measurement Circuit 1, "Containment Pressure Circuit," **delete** the word "Circuit" from the description. The word is redundant, and is not consistent with the format of Table 3.3-1 (ACTION 2) or Table 3.3-3 (ACTION 13).

b) For Process Measurement Circuit 2, "Steam Generator Pressure - Low:"

i) **Delete** the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

ii) **Delete** functional unit "Steam Generator ΔP 1 and 2 (AFAS)" from the Functional Unit Bypassed column, and **add** functional unit "AFAS-1 and AFAS-2 (AFAS)."

The Steam Generator ΔP function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for Unit 2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the Unit 2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 14.

iii) **Add** functional unit "Steam Generator Pressure-Low (RPS)" to the Functional Unit Bypassed column.

The steam generator pressure process measurement circuit provides data to both the Main Steam Isolation Signal (MSIS) of the ESFAS, and the RPS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 14. In addition, cross-referencing the two systems (ESF, RPS) for this parameter is consistent with the format of corresponding Table 3.3-1 for the RPS.

c) For Process Measurement Circuit 3, "Steam Generator Level - Low:"

i) **Delete** the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units. In addition, the description will be consistent with the same circuit listed in TABLE 3.3-3, ACTION 13.

ii) **Delete** "Steam Generator Level-Low (RPS)(AFAS)" from the Functional Unit Bypassed column, and
iii) **Add** "Steam Generator Level-Low (RPS)", and
iv) **Add** "If SG-2A, then AFAS-1 (AFAS)", and
v) **Add** "If SG-2B, then AFAS-2 (AFAS)."

The steam generator (SG) level process measurement circuits do not have cross-train functions within the AFAS. Thus, if the level measurement circuit for SG-2A is inoperable, only the corresponding AFAS-1 would be affected. Likewise, if the level measurement circuit for SG-2B is inoperable, only AFAS-2 would be affected. The proposed wording clarifies

the required action, and is consistent with the Unit 2-AFAS configuration and the proposed wording for TABLE 3.3-3, ACTION 13.

f. The following change in text will correct an error in the action statement for an inoperable process monitor in the Unit 2 Fuel Handling Building Ventilation System (FHBVS), and will achieve consistency between the corresponding TS for Unit 1 and Unit 2.

On Page 3/4 3-27, TABLE 3.3-6, under ACTION STATEMENTS: **revise ACTION 24** by replacing, "comply with the ACTION requirements of Specification 3.6.6.1," with the proper requirement, "suspend all operations involving movement of fuel within the spent fuel storage pool and crane operations with loads over the spent fuel storage pool."

Background: TS 3.3.3.1 requires the Gaseous Activity and the Particulate Activity Process Monitors for the Fuel Storage Pool Area Ventilation System (part of the FHBVS) to be OPERABLE "with irradiated fuel in the storage pool or whenever there is fuel movement within the pool or crane operation with loads over the storage pool." These monitors sample the air stream, which includes the normal exhaust from the storage pool area, as it exits the Fuel Handling Building (FHB) via the FHB vent. If either of the process monitors is inoperable, ACTION 24 of TABLE 3.3-6 must be implemented.

ACTION 24 presently directs the operator to comply with the action requirements of TS 3.6.6.1, which apply to the Shield Building Ventilation System (SBVS). During operational MODES 1, 2, 3, and 4, the stated ACTION is, "With one SBVS inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." For MODES 5 and 6 the stated ACTION is, "With one SBVS inoperable, restore the inoperable system to OPERABLE status within the next 7 days or suspend fuel movement within the spent fuel storage pool and crane operations over the spent fuel storage pool."

The SBVS is designed to collect and filter radioactive airborne fission products that may leak from the primary containment to the shield building annulus following the postulated LOCA. The system design also includes provisions for exhaust filtration in the event of a fuel handling accident in the reactor containment or the FHB. The SBVS exhausts to the Plant Vent, and is typically isolated from the FHBVS during normal plant operation.

Should a fuel handling accident occur in the FHB, the fuel storage pool area "criticality and ventilation system isolation monitor," which is composed of safety-related Area Radiation Monitors, will alarm and automatically isolate the FHB, shut off the FHBVS, and start the SBVS. The contaminated air will then be processed through the SBVS prior to

being discharged to the environment. The FHBVS Process Monitors are not related to this series of automatic functions.

Evaluation: The subject reference to TS 3.6.6.1 is an error that has no pertinent design or safety related basis, and provides the potential for inappropriate operator actions in response to an inoperable process monitor. The FHBVS Process Monitors do not sample the SBVS air stream, are not part of the SBVS actuation logic that is designed to mitigate a fuel handling accident, and the operating status of these monitors is not otherwise related to SBVS operability. Moreover, the action statements of TS 3.6.6.1 are mode dependent, and the action specified for Modes 1-4 considers SBVS equipment availability for LOCA mitigation. Accident mitigation is not a function of the subject process monitors.

The operability requirements for the FHBVS Process Monitors are mode independent and related only to normal storage pool activities with irradiated fuel in the pool. The revised action statement will properly require such fuel pool activities to be suspended in the event that even one of the monitors becomes inoperable during any mode of plant operation. The proposed change in text will make ACTION 24 consistent with NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," which was used for guidance during development of the Unit 2 TS; and, in addition, is in agreement with the corresponding TS for St. Lucie Unit 1.

g. The following minor change in text will correct an error of contradiction stated in the bases for the Emergency Core Cooling Systems (ECCS) found in Unit 2 Bases Section 3/4.5.

On Page B 3/4 5-2, under the heading "ECCS SUBSYSTEMS (Continued):" **Revise** the first sentence by **replacing** the phrase "With the RCS temperature below 325 °F" with, "In MODE 3 with RCS pressure less than 1750 psia and in MODE 4."

Limiting Condition for Operation (LCO) 3.5.3 requires at least one Emergency Core Cooling System (ECCS) subsystem to be OPERABLE in MODE 3 with pressurizer pressure less than 1750 psia, and in MODE 4. One operable ECCS subsystem is acceptable for these plant conditions without single failure consideration, based on the stable reactivity condition of the reactor and the limited core cooling requirements.

The present wording of the subject bases section implies, erroneously, that one subsystem is acceptable only when RCS temperature is below 325°F. This is a contradiction since, by definition, the average RCS temperature for MODE 3 conditions is ≥ 325 °F. The proposed wording will rectify the error and more accurately reflect the bases for LCO 3.5.3.

3.0 TECHNICAL FINDING

The staff has reviewed all of the proposed changes and determined that they correct grammar, spelling, syntax, and errors. They also eliminate unnecessary deleted pages, clarify statements, rectify references, improve consistency within and between Units, and eliminate contradictions to more accurately reflect the actual bases for the associated LCOs. The changes are administrative in nature. For those reasons the staff finds the proposed changes acceptable.

4.0 STATE CONSULTATION

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

5.0 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 (59 FR 60379). 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.

6.0 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: J. Norris

Date: March 15, 1995