

50-389



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

November 24, 1998

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

**SUBJECT: ST. LUCIE PLANT, UNIT 2 - ISSUANCE OF AMENDMENT REGARDING
REACTOR PROTECTION SYSTEM (RPS) TRIP BYPASSES
(TAC NO. MA3941)**

Dear Mr. Plunkett:

The Commission has issued the enclosed Amendment No. 98 to Facility Operating License No. NPF-16 for the St. Lucie Plant, Unit 2. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated October 29, 1998, requesting administrative changes for St. Lucie Units 1 and 2 to the TS to clarify the requirements for implementation and removal of certain RPS trip bypasses by ensuring that the meaning of explicit terms used in the TSs are consistent with the intent of the stated requirements.

This amendment revises the Table 2.2-1 notations in TS Section 2.2.1, "Reactor Trip Setpoints" and revise the Table 3.3-1 notations in TS Section 3/4.3.1, "Reactor Protective Instrumentation," by replacing the term, "thermal power," with explicit parameters that are based on output of the excore neutron flux monitors.

This proposed amendment is requested under exigent circumstances for St. Lucie Unit 2 in order to support the scheduled startup of the unit following its current refueling outage. Since the exigent circumstances do not currently apply to Unit 1, the proposed amendment for Unit 1 will be processed as non-exigent changes and will be issued separately.

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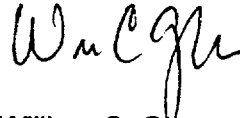
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T. F. Plunkett

- 2 -

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

Sincerely,



William C. Gleaves, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-389

Enclosures: 1. Amendment No. 98 to NPF-16
2. Safety Evaluation

cc w/encs: See next page

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Original signed by:

William C. Gleaves, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
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T. F. Plunkett

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Florida Power and Light Company

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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.98
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 October 29, 1998, 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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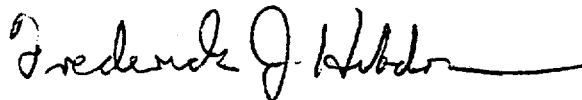
2. Accordingly, Facility Operating License No. NPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.2 to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 98 , 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 immediately upon receipt.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 24, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 98

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.

Remove Page

2-6
3/4 3-3

Insert Page

2-6
3/4 3-3

TABLE 2.2-1 (Continued)

REACTOR PROTECTIVE INSTRUMENTATION TRIP SETPOINT LIMITS

TABLE NOTATION

- (1) Trip may be manually bypassed below 0.5% of RATED THERMAL POWER during testing pursuant to Special Test Exception 3.10.3; bypass shall be automatically removed when the Wide Range Logarithmic Neutron Flux power is greater than or equal to 0.5% of RATED THERMAL POWER.
- (2) Trip may be manually bypassed below 705 psig; bypass shall be automatically removed at or above 705 psig.
- (3) % of the narrow range steam generator level indication.
- (4) Trip may be bypassed below 10^{-4} % and above 15% of RATED THERMAL POWER; bypass shall be automatically removed when Wide Range Logarithmic Neutron Flux power is $\geq 10^{-4}$ % and Power Range Neutron Flux power $\leq 15\%$ of RATED THERMAL POWER.
- (5) Trip may be bypassed below 15% of RATED THERMAL POWER; bypass shall be automatically removed when Power Range Neutron Flux power is greater than or equal to 15% of RATED THERMAL POWER.

TABLE 3.3-1 (Continued)

TABLE NOTATION

* With the protective system trip breakers in the closed position, the CEA drive system capable of CEA withdrawal, and fuel in the reactor vessel.

The provisions of Specification 3.0.4 are not applicable.

- (a) Trip may be manually bypassed below 0.5% of RATED THERMAL POWER in conjunction with (d) below; bypass shall be automatically removed when Wide Range Logarithmic Neutron Flux power is greater than or equal to 0.5% of RATED THERMAL POWER.
- (b) Trip may be manually bypassed below 705 psig; bypass shall be automatically removed at or above 705 psig.
- (c) Trip may be bypassed below 15% of RATED THERMAL POWER; bypass shall be automatically removed when Power Range Neutron Flux power is greater than or equal to 15% of RATED THERMAL POWER.
- (d) Trip may be bypassed during testing pursuant to Special Test Exception 3.10.3.
- (e) Trip may be bypassed below 10^{-4} % and above 15% of RATED THERMAL POWER; bypass shall be automatically removed when Wide Range Logarithmic Neutron Flux power is $\geq 10^{-4}$ % and Power Range Neutron Flux power $\leq 15\%$ of RATED THERMAL POWER.
- (f) Each channel shall be comprised of two trip breakers; actual trip logic shall be one-out-of-two taken twice.
- (g) There shall be at least two decades of overlap between the Wide Range Logarithmic Neutron Flux Monitoring Channels and the Power Range Neutron Flux Monitoring Channels.

ACTION STATEMENTS

ACTION 1 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and/or open the protective system trip breakers.



UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE NO. NPF-16

FLORIDA POWER AND LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT 2

DOCKET NO. 50-389

1.0 INTRODUCTION

By letter dated October 29, 1998, Florida Power and Light Company (FPL or the licensee) requested changes to the Technical Specifications (TS [Appendix A to Facility Operating License No. NPF-16]) for the St. Lucie Plant, Unit 2.

The proposed change would modify the terminology used in the notation of TS Tables 2.2-1 and 3.3-1 relative to the implementation and automatic removal of certain reactor protection system (RPS) trip bypasses. The operative parameter presently specified for the trip bypasses associated with Variable Power Level-High, Reactor Coolant Flow-Low, Local Power Density-High, Thermal Margin/Low Pressure, Steam Generator Pressure Difference-High, Loss of Load (Turbine) Hydraulic Fluid Pressure-Low, and Rate of Change of Power-High is being changed from "THERMAL POWER" to power measured by the appropriate neutron flux monitoring channel. The revisions ensure that the meaning of explicit terms used in the affected TS are consistent with the intent of the stated requirements based on St. Lucie plant design. The licensee requested that the U.S. Nuclear Regulatory Commission (NRC or staff) process this amendment request as an exigent amendment in accordance with 10 CFR 50.91(a)(6).

2.0 DISCUSSION

Footnotes (a), (c) and (e) in TS Table 3.3.1, "Reactor Protective Instrumentation," and footnotes (1), (4), and (5) in TS Table 2.2-1, "Reactor Protective Instrumentation Trip Setpoint Limits," identify operating bypass permissive and enable bistable values. The proposed amendment to the FPL Unit 2 TS would replace the words "THERMAL POWER" with "Wide Range Logarithmic Neutron Flux Power" for rated thermal power (RTP) level threshold in footnotes (a) and (e) in TS Table 3.3.1 as well as footnotes (1) and (4) in TS Table 2.2-1. The proposed amendment would also replace the words "THERMAL POWER" with "Power Range Neutron Flux Power" for RTP level threshold in footnotes (c) and (e) in TS Table 3.3.1 as well as footnotes (4) and (5) in TS Table 2.2-1. The following paragraphs provide background information related to the proposed changes.

- (a) Section 7.2, "Reactor Protective System," of the Updated Final Safety Analysis Report (UFSAR) for each St. Lucie unit describes the design and functions of the reactor

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protective instrumentation system. The analog system design provides for neutron flux monitoring over a 10-decade span (from source levels through full power operation) with signal outputs for reactor protection and control. The neutron flux monitors include Wide Range Logarithmic Safety Channels and Power Range Safety Channels that utilize neutron detectors located outside (excore) the reactor core. The Wide Range Logarithmic Channels measure neutron flux from source range to above 100% of full power, and the Power Range Channels measure neutron flux linearly through more than 2 decades, up to 200% of full power.

UFSAR, Section 7.2, also describes the protective system trip functions and the operating trip bypasses. The trip bypasses include:

Zero Power Mode Bypass - Initiated manually to allow low power testing, and is removed automatically above 0.5% power. The bypass permissive and automatic bypass removal functions are initiated by bistables in the wide range logarithmic neutron flux monitoring channels. Disables/enables the Thermal Margin/Low Pressure (logic includes Steam Generator Pressure Difference-High) trip, Reactor Coolant Flow-Low trip, and the delta-T power input to the Variable Power Level-High trip.

Local Power Density Trip Bypass - Initiated automatically below 15% power and removed automatically above 15% power. The bypass and bypass removal functions are initiated by bistables of the power range safety neutron flux monitoring channels. Disables/enables the Local Power Density-High trip.

Turbine Trip Bypass - Initiated automatically below 15% power and removed automatically above 15% power. The bypass and bypass removal functions are initiated by bistables of the power range safety neutron flux monitoring channels. Disables/enables the Loss of Load (Turbine) Hydraulic Fluid Pressure-Low trip.

Rate of Change of Power-High Trip Bypass - Initiated automatically below 10⁴% power and above 15% power. Removed automatically below 15% power and above 10⁴% power. The bypass and bypass removal functions at 10⁴% power are initiated by bistables in the wide range logarithmic neutron flux monitoring channels. The bypass and bypass removal functions at 15% power are initiated by bistables in the power range safety neutron flux monitoring channels. Disables/enables the Rate of Change of Power-High trip.

- (b) TS 2.2.1 requires the reactor protective instrumentation setpoints to be set consistent with the Trip Setpoint values shown in Table 2.2-1. Notes (1), (4) and (5) identify operating bypass permissives and/or specify requirements for automatic removal of such bypasses associated with the following protective system trip functions: Variable Power Level-High, Reactor Coolant Flow-Low, Local Power Density-High, Thermal Margin/Low Pressure (TM/LP), Steam Generator Pressure Difference-High (logic contained in TM/LP), Loss of Load (Turbine) Hydraulic Fluid Pressure-Low, and Rate of Change of Power-High.

TS 3.3.1 requires, as a minimum, that the reactor protective instrumentation channels and bypasses of Table 3.3-1 shall be OPERABLE. Notes (a), (c), and (e), similar to the Table

2.2-1 Notation, also identify the operating bypass permissives and the bypass removal requirements associated with the same protective system trip functions listed above.

In both Table 2.2-1 and 3.3-1, the operative parameter specified for automatic removal of the operating bypasses is "THERMAL POWER."

- (c) TS 1.33 defines THERMAL POWER as "the total reactor core heat transfer rate to the reactor coolant." In addition to the heat generated by the incore fission rate, this definition of THERMAL POWER includes energy deposited in the coolant from the radioactive decay of fission products generated by earlier fissions. This decay manifests itself through the emission, over a period of time, of gamma rays and beta particles. This gamma ray and beta particle heat source continues to exist after the fission process ceases and, for a previously operated commercial reactor, this decay heat source persists during any reactor shutdown. If a reactor that has experienced sustained power operation were to be subsequently maintained subcritical for an extended period, several years would be required for this residual energy to decrease to a level where the core heat transfer rate to the coolant corresponds to 10⁴%, or less, of RTP. The level of decay heat has no relationship to the present reactivity of the core and, as such, it has no relevance in determining or anticipating the rate of change of reactor (fission) power due to potential reactivity changes, including those originating from subcritical conditions. Changes in core reactivity are most directly correlated to changes in the neutron population, and any consequential changes in the fission product inventory will follow after a time. The inherent nature of the fission product decay process, therefore, ensures that the energy released through fission product decay lags the initiating fission event. This delayed energy release effect provides a sound basis for concluding that power level determinations that require the inclusion of decay heat are not suitable for use as an operative parameter for those automatic protective system actions involving the detection of or response to excessive neutron multiplication. Typically, decay heat is not a parameter directly measurable by plant nuclear instrumentation.

Table 1.2 of the facility TS defines the OPERATIONAL MODES of plant operation in terms of reactivity, thermal power, and average coolant temperature. The term "% RATED THERMAL POWER" is clearly annotated and footnoted with an asterisk to clarify that the numerical values used in the table "exclude decay heat." This exclusion applies to the power level that, in part, defines entry into the MODES wherein TS Table 3.3-1 requires the reactor protective instrumentation channels and bypass removal functions to be OPERABLE during reactor operation. The RPS trips are designed to provide real-time response to transient conditions that may occur in the defined operational modes. Therefore, it is clear that consideration of decay heat is not a significant factor for proper functioning of these protective features or the power levels identified for the onset of their functionality, e.g., the settings at which any permissible trip bypasses must be removed.

3.0 EVALUATION

As stated in the previous section, the proposed amendment to the FPL Unit 2 TS would replace the words "THERMAL POWER" with "Wide Range Logarithmic Neutron Flux Power" for RTP level threshold in footnotes (a) and (e) in TS Table 3.3.1 as well as footnotes (1) and (4) in TS

Table 2.2-1. The proposed amendment would also replace the words "THERMAL POWER" with "Power Range Neutron Flux Power" for RTP level threshold in footnotes (c) and (e) in TS Table 3.3.1 as well as footnotes (4) and (5) in TS Table 2.2-1. For all of above mentioned purposes, the appropriate power threshold should be wide range logarithmic neutron flux power and power range neutron flux power, which is the power indicated on the nuclear instrumentation, and not thermal power. Thermal power is defined in TS Section 1.3 as the total reactor heat transfer rate to the reactor coolant, and would include decay heat. Thermal power would therefore not drop to 1E-4% RTP for a number of years after shutdown, and would not provide the plant protective function correlation required at 1E-4% neutron RTP. Since "THERMAL POWER" will not decrease to less than or equal to 1E-4% RTP for normal duration plant outages, procedures would require the trip bypasses to be removed during planned startup when the plant enters Mode 2. This condition is expected to produce a trip signal as soon as the trip bypasses are removed. Therefore strict adherence to the notes as currently written would preclude plant startups.

The FPL UFSAR Table 7.2-2, "Reactor Protective System Bypasses" describes bypass initiation and removal in general terms of power without specifying the specific parameter used. In the UFSAR, Section 7.2, the descriptions of the associated protective system trips use the terms of power, neutron flux power, flux power, and reactor power interchangeably when discussing the operating bypasses. UFSAR, Section 7.2, for each unit also describes the instrumentation systems and the parameters measured by each system, and identifies the direct measurement of excore neutron flux as the process parameter that is used for power. Specifically, the 10% setting for the Rate of Change of Power-High trip bypass and the 0.5% setting for the Zero Power Mode Bypass are established based on power as measured by the Wide Range Logarithmic Neutron Flux Monitors, and the 15% setting for the Local Power Density-High, Loss of Load (Turbine) Hydraulic Fluid Pressure-Low, and Rate of Change of Power-High trip bypasses are based on power as measured by Power Range Neutron Flux Monitors.

Therefore, the intended as well as the physically possible means of generating an actuation signal from a directly measurable parameter to remove the operating bypasses, and the intended parameter used to determine when the associated reactor trips can be bypassed, is neutron flux which is measured by the logarithmic and the power range nuclear instrumentation. Changing the specified operative parameter identified for the operating bypasses in Tables 2.2-1 and 3.3-1 Notation from "THERMAL POWER" to the applicable Wide Range Logarithmic Neutron Flux power or Power Range Neutron Flux power will correct this inconsistency between the TS and the intended requirements based on the St. Lucie protective system design. This proposed change is acceptable to the staff.

4.0 EXIGENT CIRCUMSTANCES

The exigent circumstances for this TS amendment request exist because the current "THERMAL POWER" and "RATED THERMAL POWER" (RTP) wording in the FPL TS, when interpreted literally in its application in TS Table 2.2-1 and TS Table 3.3-1, could prevent the resumption of operation of the unit following its current refueling outage. This exigent situation could not have been avoided because, although this wording has existed in the FPL TS since initial licensing, it was not identified as a potential source of conflict until FPL was notified by the NRC staff in October 1998 that an inconsistency existed between the generic standard TS Table

3.3.1-1 Notation and the design basis for analog reactor protective system instrumentation used in Combustion Engineering plants.

The literal interpretation of "THERMAL POWER" in TS Table 3.3.1 and TS Table 2.2-1 could prevent the return to power operation of a shutdown reactor. The affected TS Table Notation relative to the Rate of Change of Power-High Trip Bypass function cannot be satisfied prior to entry into MODE 2 from a MODE 3 condition. Since thermal power, as defined in TS Section 1.3, includes decay heat, and decay heat would remain above 1E-4% RTP for a considerable time after shutdown, the literal interpretation of thermal power would effectively prevent the Rate of Change of Power-High Trip Bypass function from being bypassed during a normal outage, which would prevent low-power testing and subsequent startup.

The NRC staff has reviewed the circumstances surrounding the amendment request and finds that the circumstances could not have been avoided and that the licensee made a timely request for the amendment. Therefore, the staff finds that the license amendment may be issued in an exigent manner pursuant to 10 CFR 50.91(a)(6).

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

(1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed [amendment is] administrative in nature, and do[es] not change the function or the setpoints of the RPS trip bypass features. The revisions simply make corrections to the Notation of TS Tables 2.2-1 and 3.3-1 to ensure that the meaning of explicit terms used in the Notes is consistent with the intent of the stated requirements based on the St. Lucie plant design. The proposed technical specification changes do not involve accident initiators, do not change the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, and do not alter any conditions assumed in the plant accident analyses. Therefore, operation of [the] facility in accordance with its proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed [amendment is] administrative in nature and will not change the physical plant or the modes of plant operation defined in the Facility Operating [License]. The changes do not involve the addition or modification of equipment nor do they alter the design or operation of plant systems. Therefore, operation of [the] facility in accordance with its proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The proposed [amendment is] administrative in nature and do[es] not change the function or the setpoints of the RPS trip bypass features. The revisions simply make corrections to the Notation of TS Tables 2.2-1 and 3.3-1 to ensure that the meaning of explicit terms used in the Notes is consistent with the intent of the stated requirements based on the St. Lucie plant design. The proposed changes do not alter the basis for any technical specification that is related to the establishment of, or the maintenance of, a nuclear safety margin. Therefore, operation of [the] facility in accordance with its proposed amendment would not involve a significant reduction in a margin of safety.

Based upon the above considerations, the staff concludes that the amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

6.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. NRC, the State of Florida does not desire notification of issuance of license amendments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the 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 amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final finding that the amendment involves no significant hazards consideration. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

8.0 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Foster

Date: November 24, 1998