



January 25, 2002

L-2002-002
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments- Supplement
Consolidated Line Item Improvement Process
TSTF-358 - Missed Surveillance Requirements

By letter L-2001-250 dated November 21, 2001, Florida Power & Light Company (FPL) submitted a request to amend the Technical Specifications (TS) for St. Lucie Units 1 and 2. The request was to modify the TS requirements for a missed surveillance using the consolidated line item improvement process (CLIIP). The proposed amendments were similar to NRC approved Industry Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-358 Revision 6, however, the proposed wording was not the same as the approved CLIIP. On December 20, 2001, the NRC Project Manager for St. Lucie notified FPL that editorial changes made to the proposed wording in Surveillance Requirement 4.0.3 were not sufficiently consistent with the CLIIP. FPL had changed the wording in Surveillance Requirement 4.0.3 from "risk evaluation" to "risk assessment" in the original submittal. By this letter, FPL is submitting revised wording for Surveillance Requirement 4.0.3 and the Bases for Surveillance Requirement 4.0.3 to be consistent with the TSTF-358 except as discussed below.

There are only two justified changes necessary from the wording in TSTF-358 Revision 6. These were discussed with the NRC Project Manager and considered necessary because of plant specific differences between the plant's TSs and the TSTF wording. Section 3.0.3 is changed to 4.0.3 and "Conditions" is changed to "ACTION(s)". The St. Lucie TS does not have "Conditions" only "Actions". The revised wording for Surveillance 4.0.3 and the revised Bases for SR 4.0.3 are attached.

If you should have any questions regarding this submittal, please contact George Madden at 561-467-7155.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by FPL to make this request and that the foregoing is true and correct.

Very truly yours,


Donald E. Jernigan
Vice President
St. Lucie Plant

DEJ/GRM

Attachment

cc: Mr. William A. Passetti, Florida Department of Health

A001

ATTACHMENT

St. Lucie Unit 1 and Unit 2 Revised Inserts for SR 4.0.3 and the Bases for SR 4.0.3

REVISED SURVEILLANCE REQUIREMENT INSERT 1 (Completely replaces existing SR 4.0.3)

If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition of Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition of Operation must immediately be declared not met, and the applicable ACTION(s) must be taken.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition of Operation must immediately be declared not met, and the applicable ACTION(s) must be taken.

REVISED BASES INSERT 1 (Completely replaces existing the Bases for SR 4.0.3)

SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance requirement has not been completed within the specified frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 4.0.2, and not at the time that the specified frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance requirement before complying with required ACTION(s) or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 4.0.3 allows for the full delay period of up to the specified frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 4.0.3 provides a time limit for, and allowances for the performance of, a Surveillance that becomes applicable as a consequence of MODE changes imposed by required ACTION(s).

Failure to comply with the specified frequency for a SR is expected to be an infrequent occurrence. Use of the delay period established by SR 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the

first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, *Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants*. This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the course of action. All cases of a missed Surveillance will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the required ACTION(s) for the applicable Limiting Condition of Operation begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the required ACTION(s) for the applicable Limiting Condition of Operation begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 4.0.1.