Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

July 18, 2002

L-2002-111
10 CFR 50.90

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Relocation of Spent Fuel Crane
Technical Specification Requirements

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specification (TS) revisions. The proposed amendments would implement an administrative change to relocate TS spent fuel crane related requirements to the respective unit's UFSAR. Relocation to the UFSAR will preserve the requirements and ensure that any future changes to the requirements are controlled under 10 CFR 50.59. This action represents a change in FPL's NUREG-0612 heavy load commitments in that the TS control previously credited for limiting loads over the spent fuel pool will now reside in the UFSAR.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain the affected Technical Specifications pages marked-up to show the proposed changes. Attachment 5 contains the word-processed TS changes.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed amendment. In accordance with 10 CFR 50.91(b)(1), copies of the proposed amendment are being forwarded to the State Designee for the State of Florida.

Please contact us if there are any questions about this submittal.

Very truly yours,

Donald E. Jernigan
Vice President
St. Lucie Plant

DEJ/KWF

Attachments

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

A001

STATE OF FLORIDA )
) ss.
COUNTY OF ST. LUCIE )

Donald E. Jernigan, being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

Donald E. Jernigan

STATE OF FLORIDA

COUNTY OF St. Lucie

Sworn to and subscribed before me

this 18 day of July, 2002

by Donald E. Jernigan, who is personally known to me.

Leslie J. Whitwell

Signature of Notary Public-State of Florida

Leslie J. Whitwell
MY COMMISSION # DD020212 EXPIRES
May 12, 2005
BONDED THRU TROY FAIN INSURANCE, INC.

Name of Notary Public (Print, Type, or Stamp)

# EVALUATION OF PROPOSED TS CHANGES

## EVALUATION OF PROPOSED TS CHANGES

### BACKGROUND

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specification (TS) revisions. The proposed amendments would implement an administrative change to relocate TS spent fuel crane related requirements to the respective unit's Updated Final Safety Analysis Report (UFSAR). Relocation to the UFSAR will preserve the requirements and ensure that any future changes to the requirements are controlled under 10 CFR 50.59.

### DISCUSSION

In July 1993, the NRC issued a Final Policy Statement on Technical Specification Improvements for nuclear power reactors in the Federal Register [Reference 1]. The policy statement contained four objective criteria, whose purpose was to focus the Technical Specifications on only those requirements that are important to operational safety. The four criteria are now codified in 10 CFR 50.36 [Reference 2]. The criteria identify requirements derived from the analyses and evaluations included in the UFSAR that are of immediate concern to the health and safety of the public. Generally, the criteria identify operating requirements related to: 1) detecting reactor coolant pressure boundary degradation; 2) operation within the initial conditions of the accident analyses; 3) accident mitigation; and 4) the operation of other risk-significant structures, systems, or components not covered by the first three criteria. 10 CFR 50.36(c)(2)(ii) requires that a technical specification limiting condition for operation (LCO) must be established for items meeting one or more of the criteria.

The Final Policy Statement also encouraged licensees to implement a voluntary update program of their Technical Specifications to be consistent with the Standard Technical Specifications (e.g., NUREG-1432 for Combustion Engineering (CE) plants [Reference 3]). The four 10 CFR 50.36 criteria provide a basis for relocating requirements from the Technical Specifications to other licensee-controlled documents, provided the requirements meet none of the four criteria. NRC Staff Review of NSSS Vendor Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications ("split report") [Reference 4] provides NRC staff review of each reactor vendor Owners Group's application of the four criteria to their respective Standard Technical Specifications (STS). For the CE plant STS, Reference 4 acknowledged that approximately 45% of the LCOs (72 out of 159) found in the STS could be relocated to other licensee-controlled documents, because the LCOs met none of the four screening criteria. The list of retained and relocated LCOs is tabulated in Appendix C of Reference 4.

St. Lucie Plant (PSL)

FPL has previously received NRC approval to relocate certain sections of the PSL Technical Specifications to the UFSAR by applying the 10 CFR 50.36 criteria, most recently in August 1996 [References 5 and 8].

Precedent Licensing Actions

Some licensing precedents for similar administrative changes to relocate spent fuel-related crane technical specifications include:

- Beaver Valley Units 1&2 received a license amendment in 2000 to relocate Technical Specification requirements for their Spent Fuel Storage Pool Building Crane to another licensee-controlled document [Reference 6].

- D. C. Cook Units 1&2 submitted a license amendment request on February 22, 2002 to relocate two Technical Specifications for cranes related to Refueling Operations. The Cook letter in turn cited recent licensing precedents where Hope Creek and Millstone Unit 2 received NRC approval for similar refueling operations Technical Specification relocations to the UFSAR and Technical Requirements Manual, respectively [Reference 7].

## DESCRIPTION OF PROPOSED CHANGE

Marked-up pages of the proposed St. Lucie Unit 1 and Unit 2 Technical Specification changes are shown in Attachments 3 and 4, respectively. The description of the proposed changes is summarized below.

The following **Unit 1** Technical Specifications are to be relocated to the Unit 1 UFSAR:

| | |
|---|---|
| Section 3/4.9.7 | Crane Travel – Spent Fuel Storage Pool Building |
| Section 3/4.9.13 | Spent Fuel Cask Crane |

The following **Unit 2** Technical Specifications are to be relocated to the Unit 2 UFSAR:

| | |
|---|---|
| Section 3/4.9.7 | Crane Travel – Spent Fuel Storage Pool Building |
| Section 3/4.9.12 | Spent Fuel Cask Crane |

The above changes relocate TS requirements that apply to the spent fuel cask crane and the fuel handling crane for each unit; no changes are made to the requirements themselves. Relocating these requirements to the UFSAR is consistent with the intent of the 1993 NRC Policy Statement, and is also consistent with NUREG-1432 (STS for CE

Plants). Further, licensing precedent for similar administrative changes to relocate spent fuel-related crane TSs has been found on several other plants.

## BASIS/JUSTIFICATION FOR PROPOSED CHANGE

The basis for these proposed administrative changes is simplification of the PSL Technical Specifications, by relocating spent fuel-related crane requirements that are not of controlling importance to operational safety. This basis is consistent with the Improved Standard Technical Specifications for CE Plants and the 1993 NRC Policy Statement.

Each Technical Specification proposed for relocation to the UFSAR is compared below to the four 10 CFR 50.36 screening criteria. The proposed changes are justified only if the existing specifications meet none of the criteria.

Crane Travel TS Section 3/4.9.7 is similar for both units, and is therefore reviewed jointly for both units. Cask Crane TS Sections 3/4.9.13 and 3/4.9.12 for Units 1 and 2, respectively, are also reviewed together.

### A. TS 3/4.9.7, Crane Travel – Spent Fuel Storage Pool Building (reviewed for both units)

Summary of Specification and its Basis

The TS 3/4.9.7 Limiting Condition for Operation (LCO) prohibits loads weighing in excess of the nominal weight of a fuel assembly, control element assembly (CEA), and associated handling tool from travel over irradiated fuel assemblies in the spent fuel pool. These weight limits are 2000 pounds for Unit 1 and 1600 pounds for Unit 2. The bases for these load restrictions support the UFSAR Chapter 15 fuel handling accident analyses assumptions to: 1) limit the activity released on a load drop to no more than the contents of a single fuel assembly; and 2) prevent a load drop from distorting fuel in the storage racks that would result in a critical geometry.

TS comparison to Criterion 1

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

Comparison: The restrictions on the weight and travel of crane loads over irradiated spent fuel are not related to any installed instrumentation that is used to detect reactor coolant pressure boundary degradation or to indicate such degradation in the control room. Therefore, TS 3/4.9.7 does not meet Criterion 1.

TS comparison to Criterion 2

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

Comparison: TS 3/4.9.7 is linked by its basis to the fuel handling accident (FHA) described in UFSAR Chapter 15. The TS 3/4.9.7 crane load limit is one of many operating restrictions that provides defense-in-depth against a heavy load drop accident over irradiated fuel. As stated in the technical specification basis, if the load drop were to occur, consequences are limited to the equivalent of a single fuel assembly and CEA. This single assembly load restriction is consistent with the activity release from one fuel assembly assumed in the fuel handling accident.

Criterion 2 applies to process variables, design features, and operating restrictions that are initial conditions of a design basis accident that either challenges or leads to failure of a fission product barrier. In this context, the weight restriction of TS 3/4.9.7 is not an initial condition of the accident, but rather, an inherent element of the event initiator. More appropriately, an initial condition of any accident such as the FHA is represented by the parametric envelope that defines the consequences of that accident. In the case of the FHA, an appropriate "initial condition" is the column of water required in the spent fuel pool to absorb fission products released from the damaged assemblies. Appropriately, TS 3/4.9.11 provides an LCO for this initial condition; 23 feet minimum water level.

The TS load limit restriction, in conjunction with other non-TS requirements that restrict crane operation (such as interlocks and physical stops, operator training, and load handling procedures) provide a defense-in-depth approach to handling heavy loads in the spent fuel pool vicinity. These features do not, however, meet the Criterion 2 intent of an initial condition for the fuel handling accident.

Therefore, this specification is not an initial condition of a design basis accident (DBA) or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Thus, TS 3/4.9.7 does not meet Criterion 2.

TS comparison to Criterion 3

Criterion 3: *A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Comparison: As discussed under Criterion 2, the spent fuel cranes addressed by TS 3/4.9.7 are an element of event initiation and are not required to mitigate the fuel handling accident or any other design basis accident or transient relating to fission product barrier integrity. Therefore, TS 3/4.9.7 does not meet Criterion 3.

TS comparison to Criterion 4

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

Comparison: The spent fuel cranes addressed by TS 3/4.9.7 are not components listed as risk significant under either the St. Lucie probabilistic risk assessment program or the St. Lucie Maintenance Rule Program. Therefore, TS 3/4.9.7 does not satisfy Criterion 4.

Conclusion

Based on comparison of TS 3/4.9.7 and its bases to the 10 CFR 50.36 screening criteria above, the load restriction over irradiated fuel in the spent fuel pool imposed on the spent fuel cask crane and the fuel handling crane does not meet any of the four criteria for retention in the TSs. Further, the Standard Technical Specifications for CE plants found in NUREG-1432, Revision 2, do not contain a specification for spent fuel crane load/travel restrictions. Therefore, a technical basis exists for relocating TS 3/4.9.7 requirements to the St. Lucie Unit 1 and 2 UFSARs.

**B. U1 TS 3/4.9.13 and U2 TS 3/4.9.12, Spent Fuel Cask Crane (reviewed for both units)**

Summary of Specification and its Basis

The TS 3/4.9.13 [12] Limiting Condition for Operation prohibits the spent fuel cask crane from handling loads weighing in excess of 25 tons for Unit 1 and 100 tons for Unit 2. The Unit 1 load limit is based on the maximum weight of a loaded single-element cask; the Unit 2 load limit is based on the weight of a loaded multi-element cask. For both units, the cask crane load limit is imposed to ensure the weight remains within the cask drop analysis, so that a dropped cask will not threaten the structural integrity of the spent fuel pool. Although the design of the cask crane and its associated interlocks and stops prevent a cask from traversing over the spent fuel pool, a cask drop outside the pool area (i.e., into the cask pit area) has been analyzed for damage to the adjacent spent fuel pool structure and liner. Load drops beyond the TS weight limit have not been analyzed for potential pool liner leakage

beyond the maximum pool makeup water capability which, if it occurred, could drain the pool and result in a loss of the spent fuel heat sink.

TS comparison to Criterion 1

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

Comparison: Load restrictions on the spent fuel cask cranes are not related to any installed instrumentation that is used to detect reactor coolant pressure boundary degradation or to indicate such degradation in the control room. Therefore, Unit 1 TS 3/4.9.13 and Unit 2 TS 3/4.9.12 do not meet Criterion 1.

TS comparison to Criterion 2

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

Comparison: TS 3/4.9.13 [12] is linked by its basis to the cask drop accident in the vicinity of the spent fuel pool, as described in Unit 1 UFSAR Chapter 9 and in Unit 2 UFSAR Chapter 15. The TS 3/4.9.13 [12] cask crane load limit is an operating restriction consistent with an UFSAR analysis that shows that the consequences of a heavy load drop accident in the cask pit area does not challenge spent fuel pool structural (liner) integrity beyond the pool's makeup water capability, thereby ensuring that spent fuel pool cooling is preserved.

Criterion 2 applies to process variables, design features, and operating restrictions that are initial conditions of a design basis accident that either challenges or leads to failure of a fission product barrier. The cask drop accident to which this TS applies is a cask drop in the cask pit area. The analysis of this drop demonstrates that the spent fuel pool integrity is maintained within makeup capability for load drops within the TS load limit. In this context, the weight restriction of TS 3/4.9.13 [12] is not an initial condition of the accident, but rather, an inherent element of the event initiator.

The crane load limit restriction, in conjunction with other non-TS requirements that restrict cask crane operation (such as interlocks and physical stops, operator training, load handling procedures, and safe load paths) provide a defense-in-depth approach to handling heavy loads (e.g., fuel transfer casks) in the spent fuel pool vicinity. These features do not, however, meet the Criterion 2 intent of an initial condition for the cask drop accident.

Therefore, this specification is not an initial condition of a DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Thus, Unit 1 TS 3/4.9.13 and Unit 2 TS 3/4.9.12 do not meet Criterion 2.

TS comparison to Criterion 3

Criterion 3: *A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Comparison: As discussed under Criterion 2, the spent fuel cask cranes are an element of event initiation and are not required to mitigate the cask drop accident or any other design basis accident or transient relating to fission product barrier integrity. Therefore, Unit 1 TS 3/4.9.13 and Unit 2 TS 3/4.9.12 do not satisfy Criterion 3.

TS comparison to Criterion 4

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

Comparison: The spent fuel cask cranes are not components listed as risk significant under either the St. Lucie probabilistic risk assessment program or the St. Lucie Maintenance Rule Program. Therefore, Unit 1 TS 3/4.9.13 and Unit 2 TS 3/4.9.12 do not satisfy Criterion 4.

Conclusion

Based on comparison of Unit 1 TS 3/4.9.13 and Unit 2 TS 3/4.9.12 to the 10 CFR 50.36 screening criteria above, load weight restrictions on the spent fuel cask cranes do not meet any of the four criteria for retention in the TSs. Further, the Standard Technical Specifications for CE plants found in NUREG-1432, Revision 2, do not contain a specification for spent fuel cask crane load limits. Therefore, a technical basis exists for relocating Unit 1 TS 3/4.9.13 and Unit 2 TS 3/4.9.12 requirements to the UFSAR.

## SUMMARY CONCLUSION

The technical specification sections for both PSL units reviewed above do not meet any of the four 10 CFR 50.36 screening criteria and may be relocated to the respective unit's

UFSAR. Relocating these technical specification requirements to the UFSAR will be consistent with the Improved Standard Technical Specifications for CE plants, will be consistent with the 1993 NRC Policy Statement regarding Technical Specifications content, and will ensure future changes are controlled under the requirements of 10 CFR 50.59.

**References**

1. Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, 58 FR 39132 dated July 22, 1993.
2. 10 CFR 50.36(c)(2)(ii), Technical Specifications [screening criteria].
3. NUREG-1432, Standard Technical Specifications for Combustion Engineering Plants, Rev. 2 dated April 2001.
4. NRC Staff Review of NSSS Vendor Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications ("split report"), dated May 9, 1988.
5. FPL letter to NRC, L-95-233 dated August 16, 1995, Relocation of Selected Technical Specification Requirements Related to Instrumentation.
6. NRC SER for Beaver Valley 1&2 dated September 7, 2000, Approval to Relocate Technical Specification Requirements for Spent Fuel Storage Pool Building Crane to the Licensing Requirements Manual.
7. Indiana Michigan Power Company (D. C. Cook 1&2) letter to NRC dated February 22, 2002, License Amendment Request for Technical Specification 3/4.9, Refueling Operations.
8. NRC SER for TS amendments 147 and 86 for St. Lucie Units 1 and 2 dated August 20, 1996, Issuance of Amendments RE: Technical Specification Relocation.

# DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

**Description of amendment request**: The proposed license amendments to Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 will relocate TS spent fuel crane related requirements to the respective unit's the Updated Final Safety Analysis Report (UFSAR). Relocation of these requirements to the UFSAR will not modify the requirements, and is consistent with the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, FR, 58, No. 139, pg 39132, dated July 22, 1993, and is also consistent with 10 CFR 50.36 and NUREG-1432, Standard Technical Specifications – CE Plants.

Pursuant to 10 CFR 50.92, a determination may be made that a proposed license amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (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. Each standard is discussed as follows.

1) Would operation of the facility in accordance with the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   No. The proposed changes to the Technical Specifications are administrative in nature in that the Technical Specifications for operation and surveillance of the spent fuel cask crane and the fuel handling crane will be relocated from Appendix A of the facility operating license to the UFSAR for each unit. The crane operation and surveillance requirements are not altered by this relocation. Once relocated, any future changes will be controlled by 10 CFR 50.59, and the UFSARs will be updated pursuant to 10 CFR 50.71(e).

   Because no operating requirements are changed by the proposed amendment, crane operation following the proposed amendment would not differ from current crane operation. The proposed Technical Specification changes do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do the changes alter any assumptions or conditions in any of the plant accident analyses. Therefore, facility operation in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated in the UFSAR.

2) Would operation of the facility in accordance with the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

   No. The proposed amendment will not affect the design function of any system, structure, or component. Relocating the existing Technical Specification requirements for the spent fuel cask crane and the fuel handling crane to the UFSAR is an administrative change and will not modify the physical plant or the modes of plant operation defined in the Facility Operating License. The operating restrictions imposed on the spent fuel-related cranes by the existing Technical Specifications will be retained in the UFSAR under this change. The change does not involve the addition or modification of equipment, nor does it alter the design or operation of plant systems. Therefore, operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different accident from any accident previously evaluated.

3) Would operation of the facility in accordance with the proposed amendment involve a significant reduction in a margin of safety?

   No. The proposed changes to the Technical Specifications are administrative in nature in that the Technical Specifications for operation and surveillance of the spent fuel cask crane and the fuel handling crane will be relocated from Appendix A of the facility operating license to the UFSAR for each unit. The crane operating restrictions that are being relocated to the UFSAR by this change are not being relaxed or eliminated. 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 the proposed amendment will not involve a significant reduction in a margin of safety as defined in the basis for any Technical Specification or in any licensing document.

Based on the determination made above, FPL concludes that the proposed amendments involve no significant hazards consideration.

**Environmental Consideration**

The proposed license amendments do not change requirements with respect to the use of a facility component located within the restricted area as defined in 10 CFR Part 20. The proposed amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL concluded that the proposed amendments involve no significant hazards consideration and meets the

criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and that, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

**Conclusion**

FPL concludes, 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.

ST. LUCIE UNIT 1 MARKED-UP TECHNICAL SPECIFICATION PAGES

Page VIII
Page 3/4 9-7
Page 3/4 9-15

## INDEX

**LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS**


| SECTION | | PAGE |
|---|---|---|
| 3/4.9 | REFUELING OPERATIONS | |
| 3/4.9.1 | BORON CONCENTRATION | 3/4 9-1 |
| 3/4.9.2 | INSTRUMENTATION | 3/4 9-2 |
| 3/4.9.3 | DECAY TIME | 3/4 9-3 |
| 3/4.9.4 | CONTAINMENT PENETRATIONS | 3/4 9-4 |
| 3/4.9.5 | COMMUNICATIONS | 3/4 9-5 |
| 3/4.9.6 | MANIPULATOR CRANE OPERABILITY | 3/4 9-6 |
| 3/4.9.7 | ~~CRANE TRAVEL – SPENT FUEL STORAGE POOL BUILDING~~ DELETED | 3/4 9-7 |
| 3/4.9.8 | SHUTDOWN COOLING AND COOLANT CIRCULATION | 3/4 9-8 |
| 3/4.9.9 | CONTAINMENT ISOLATION SYSTEM | 3/4 9-9 |
| 3/4.9.10 | WATER LEVEL – REACTOR VESSEL | 3/4 9-10 |
| 3/4.9.11 | STORAGE POOL WATER LEVEL | 3/4 9-11 |
| 3/4.9.12 | FUEL ~~POOL VENTILATION~~ SYSTEM – FUEL STORAGE | 3/4 9-12 |
| 3/4.9.13 | ~~SPENT FUEL CASK CRANE~~ DELETED | 3/4 9-15 |
| 3/4.9.14 | DECAY TIME – STORAGE POOL | 3/4 9-16 |
| 3/4.10 | SPECIAL TEST EXCEPTIONS | |
| 3/4.10.1 | SHUTDOWN MARGIN | 3/4 10-1 |
| 3/4.10.2 | GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS | 3/4 10-2 |
| 3/4.10.3 | DELETED | 3/4 10-3 |
| 3/4.10.4 | DELETED | 3/4 10-4 |
| 3/4.10.5 | CENTER CEA MISALIGNMENT | 3/4 10-5 |

DELETED

**REFUELING OPERATIONS**

**CRANE TRAVEL – SPENT FUEL STORAGE POOL BUILDING**

**LIMITING CONDITION FOR OPERATION**

3.9.7 Loads in excess of 2000 pounds shall be prohibited from travel over irradiated fuel assemblies in the storage pool.

**APPLICABILITY:** With fuel assemblies in the storage pool.

**ACTION:**

With the requirements for above specification not satisfied, place the crane load in a safe condition. The provisions of Specification 3.0.3 are not applicable.

**SURVEILLANCE REQUIREMENTS**

4.9.7 Crane interlocks and physical stops which prevent crane travel with loads in excess of 2000 pounds over fuel assemblies shall be demonstrated OPERABLE with 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

**REFUELING OPERATIONS**

**SPENT FUEL CASK CRANE**

**LIMITING CONDITION FOR OPERATION**

3.9.13 The maximum load which may be handled by the spent fuel cask crane shall not exceed 25 tons.

**APPLICABILITY:** Whenever irradiated fuel assemblies are in the storage pool.

**ACTION:**

With the requirements of the above specification not satisfied, place load in a safe condition. The provisions of Specification 3.0.3 are not applicable.

**SURVEILLANCE REQUIREMENTS**

4.9.13 The loaded weight of a spent fuel assembly cask shall be verified to not exceed 25 tons prior to attaching it to the spent fuel cask crane.

DELETED

ST. LUCIE UNIT 2 MARKED-UP TECHNICAL SPECIFICATION PAGEs

Page IX
Page 3/4 9-7
Page 3/4 9-13

## INDEX

**LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS**


| SECTION | | PAGE |
|---|---|---|
| 3/4.8.2 | D.C. SOURCES | |
| | OPERATING | 3/4 8-10 |
| | SHUTDOWN | 3/4 8-13 |
| 3/4.8.3 | ONSITE POWER DISTRIBUTION SYSTEMS | |
| | OPERATING | 3/4 8-14 |
| | SHUTDOWN | 3/4 8-16 |
| 3/4.8.4 | ELECTRICAL EQUIPMENT PROTECTIVE DEVICES | |
| | MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION BYPASS DEVICES | 3/4 8-17 |
| 3/4.9 | REFUELING OPERATIONS | |
| 3/4.9.1 | BORON CONCENTRATION | 3/4 9-1 |
| 3.4.9.2 | INSTRUMENTATION | 3/4 9-2 |
| 3/4.9.3 | DECAY TIME | 3/4 9-3 |
| 3/4.9.4 | CONTAINMENT BUILDING PENETRATIONS | 3/4 9-4 |
| 3/4.9.5 | COMMUNICATIONS | 3/4 9-5 |
| 3/4.9.6 | ~~MANIPULATOR CRANE~~ DELETED | 3/4 9-6 |
| 3/4.9.7 | ~~CRANE TRAVEL – SPENT FUEL STORAGE POOL BUILDING~~ DELETED | 3/4 9-7 |
| 3/4.9.8 | SHUTDOWN COOLING AND COOLANT CIRCULATION | |
| | HIGH WATER LEVEL | 3/4 9-8 |
| | LOW WATER LEVEL | 3/4 9-9 |
| 3/4.9.9 | CONTAINMENT ISOLATION SYSTEM | 3/4 9-10 |
| 3/4.9.10 | WATER LEVEL – REACTOR VESSEL | 3/4 9-11 |
| 3/4.9.11 | ~~SPENT FUEL STORAGE POOL~~ DELETED | 3/4 9-12 |
| 3/4.9.12 | ~~SPENT FUEL CASK CRANE~~ DELETED | 3/4 9-13 |
| 3/4.10 | SPECIAL TEST EXCEPTIONS | |
| 3/4.10.1 | SHUTDOWN MARGIN | 3/4 10-1 |
| 3/4.10.2 | MODERATOR TEMPERATURE COEFFICIENT, GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS | 3/4 10-2 |
| 3/4.10.3 | REACTOR COOLANT LOOPS | 3/4 10-3 |
| 3/4.10.4 | CENTER CEA MISALIGNMENT | 3/4 10-4 |
| 3/4.10.5 | CEA INSERTION DURING ITC, MTC, AND POWER COEFFICIENT MEASUREMENTS | 3/4 10-5 |

**REFUELING OPERATIONS**

**3/4.9.7 CRANE TRAVEL – SPENT FUEL STORAGE POOL BUILDING**

**LIMITING CONDITION FOR OPERATION**

3.9.7 Loads in excess of 1600 pounds shall be prohibited from travel over fuel assemblies in the spent fuel storage pool.

**APPLICABILITY:** With fuel assemblies in the spent fuel storage pool.

**ACTION:**

With the requirements for above specification not satisfied, place the crane load in a safe condition.

**SURVEILLANCE REQUIREMENTS**

4.9.7 Crane interlocks and physical stops which prevent crane travel with loads in excess of 1600 pounds over fuel assemblies shall be demonstrated OPERABLE with 7 days prior to crane use and at least once per 7 days thereafter during crane operation.

DELETED

**REFUELING OPERATIONS**

**SPENT FUEL CASK CRANE**

**LIMITING CONDITION FOR OPERATION**

3.9.12 The maximum load which may be handled by the spent fuel cask crane shall not exceed 100 tons.

**APPLICABILITY:** Whenever irradiated fuel assemblies are in the spent fuel storage pool.

**ACTION:**

With the requirements of the above specification not satisfied, place load in a safe condition. The provisions of Specification 3.0.3 are not applicable.

**SURVEILLANCE REQUIREMENTS**

4.9.12 The loaded weight of a spent fuel assembly cask shall be verified to not exceed 100 tons prior to attaching it to the spent fuel cask crane.

DELETED

ST. LUCIE UNITS 1 AND 2 WORD-PROCESSED
TECHNICAL SPECIFICATION PAGES

UNIT 1

Page VII
Page 3/4 9-7
Page 3/4 9-15

UNIT 2

Page IX
Page 3/4 9-7
Page 3/4 9-13

## INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS


| SECTION | | PAGE |
|---|---|---|
| 3/4.9 | REFUELING OPERATIONS | |
| 3/4.9.1 | BORON CONCENTRATION | 3/4 9-1 |
| 3/4.9.2 | INSTRUMENTATION | 3/4 9-2 |
| 3/4.9.3 | DECAY TIME | 3/4 9-3 |
| 3/4.9.4 | CONTAINMENT PENETRATIONS | 3/4 9-4 |
| 3/4.9.5 | COMMUNICATIONS | 3/4 9-5 |
| 3/4.9.6 | MANIPULATOR CRANE OPERABILITY | 3/4 9-6 |
| 3/4.9.7 | DELETED | 3/4 9-7 |
| 3/4.9.8 | SHUTDOWN COOLING AND COOLANT CIRCULATION | 3/4 9-8 |
| 3/4.9.9 | CONTAINMENT ISOLATION SYSTEM | 3/4 9-9 |
| 3/4.9.10 | WATER LEVEL – REACTOR VESSEL | 3/4 9-10 |
| 3/4.9.11 | STORAGE POOL WATER LEVEL | 3/4 9-11 |
| 3/4.9.12 | FUEL POOL VENTILATION SYSTEM – FUEL STORAGE | 3/4 9-12 |
| 3/4.9.13 | DELETED | 3/4 9-15 |
| 3/4.9.14 | DECAY TIME – STORAGE POOL | 3/4 9-16 |
| 3/4.10 | SPECIAL TEST EXCEPTIONS | |
| 3/4.10.1 | SHUTDOWN MARGIN | 3/4 10-1 |
| 3/4.10.2 | GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS | 3/4 10-2 |
| 3/4.10.3 | DELETED | 3/4 10-3 |
| 3/4.10.4 | DELETED | 3/4 10-4 |
| 3/4.10.5 | CENTER CEA MISALIGNMENT | 3/4 10-5 |

**INTENTIONALLY DELETED**

**INTENTIONALLY DELETED**

**INDEX**

**LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS**


| SECTION | | PAGE |
|---|---|---|
| 3/4.8.2 | D.C. SOURCES | |
| | OPERATING | 3/4 8-10 |
| | SHUTDOWN | 3/4 8-13 |
| 3/4.8.3 | ONSITE POWER DISTRIBUTION SYSTEMS | |
| | OPERATING | 3/4 8-14 |
| | SHUTDOWN | 3/4 8-16 |
| 3/4.8.4 | ELECTRICAL EQUIPMENT PROTECTIVE DEVICES | |
| | MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION BYPASS DEVICES | 3/4 8-17 |
| 3/4.9 | REFUELING OPERATIONS | |
| 3/4.9.1 | BORON CONCENTRATION | 3/4 9-1 |
| 3.4.9.2 | INSTRUMENTATION | 3/4 9-2 |
| 3/4.9.3 | DECAY TIME | 3/4 9-3 |
| 3/4.9.4 | CONTAINMENT BUILDING PENETRATIONS | 3/4 9-4 |
| 3/4.9.5 | COMMUNICATIONS | 3/4 9-5 |
| 3/4.9.6 | MANIPULATOR CRANE | 3/4 9-6 |
| 3/4.9.7 | DELETED | 3/4 9-7 \| |
| 3/4.9.8 | SHUTDOWN COOLING AND COOLANT CIRCULATION | |
| | HIGH WATER LEVEL | 3/4 9-8 |
| | LOW WATER LEVEL | 3/4 9-9 |
| 3/4.9.9 | CONTAINMENT ISOLATION SYSTEM | 3/4 9-10 |
| 3/4.9.10 | WATER LEVEL – REACTOR VESSEL | 3/4 9-11 |
| 3/4.9.11 | SPENT FUEL STORAGE POOL | 3/4 9-12 |
| 3/4.9.12 | DELETED | 3/4 9-13 \| |
| 3/4.10 | SPECIAL TEST EXCEPTIONS | |
| 3/4.10.1 | SHUTDOWN MARGIN | 3/4 10-1 |
| 3/4.10.2 | MODERATOR TEMPERATURE COEFFICIENT, GROUP HEIGHT, INSERTION AND POWER DISTRIBUTION LIMITS | 3/4 10-2 |
| 3/4.10.3 | REACTOR COOLANT LOOPS | 3/4 10-3 |
| 3/4.10.4 | CENTER CEA MISALIGNMENT | 3/4 10-4 |
| 3/4.10.5 | CEA INSERTION DURING ITC, MTC, AND POWER COEFFICIENT MEASUREMENTS | 3/4 10-5 |

**INTENTIONALLY DELETED**

**INTENTIONALLY DELETED**