

July 29, 2002

Mr. J. A. Stall  
Senior Vice President  
Nuclear and Chief Nuclear Officer  
Florida Power and Light Company  
700 Universe Boulevard  
P. O. Box 14000  
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR THE REVIEW OF  
SECTIONS 2.2, 2.3, AND APPENDIX B OF THE APPLICATION FOR  
RENEWED OPERATING LICENSES FOR ST. LUCIE UNITS 1 AND 2

Dear Mr. Stall:

By letter dated November 29, 2001, Florida Power and Light Company (FPL) submitted, for Nuclear Regulatory Commission (NRC) review, an application, pursuant to Title 10, Part 54, of the *Code of Federal Regulations* (10 CFR Part 54), to renew the operating licenses for the St. Lucie Nuclear Plant, Units 1 and 2. The NRC staff is reviewing the information contained in this license renewal application (LRA) and has identified, in the enclosure, areas where additional information is needed to complete its review. Specifically, the enclosed RAIs concern Sections 2.2 and 2.3 and Appendix B of the LRA.

Please provide a schedule, by letter or electronic mail, for submitting your response within 30 days of the receipt of this letter. Additionally, the staff would be willing to meet with FPL prior to the submittal of the response to clarify its RAIs.

Sincerely,

/RA/

Noel Dudley, Senior Project Manager  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION  
ST. LUCIE UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION

The staff of the U.S. Nuclear Regulatory Commission (NRC) met with representatives of Florida Power and Light Company (FPL) on July 23, 2002, to discuss draft requests for additional information (RAIs) concerning the license renewal application (LRA) for St. Lucie Units 1 and 2. On the basis of this discussion, the staff is issuing the following RAIs.

The staff requests that FPL provide a schedule for submitting its response within 30 days of the receipt of these RAIs. The staff is willing to meet with FPL prior to the submittal of the response to clarify its RAIs.

## **2.2 PLANT LEVEL SCOPING RESULTS**

### RAI 2.2-2

Table 2.2-1 of the LRA does not include miscellaneous drains. On the basis of the plant internal flood analysis, documented in the Unit 1 and 2 Updated Final Safety Analysis Reports (UFSARs), it appears that the drain systems for many of the in-scope structures provide a flood protection barrier that supports the capability to shut down the reactor and maintain it in a safe shutdown condition. Degradation of these systems, such as blockage due to foreign material concentration or excessive corrosion, could invalidate the flooding analysis and prevent satisfactory accomplishment of the intended function of safety-related systems. Therefore, major portions of the plant/building drain system should be within the scope of license renewal and subject to an aging management review (AMR) per 10 CFR 54.4(a)(ii).

Examples of flooding analyses for Unit 2, which take credit for floor drains include:

- Break in the diesel generator building, page 3.6F-7.
- Break in the component cooling water building, page 3.6F-7.

Justify why these drain systems are considered to be outside the scope of license renewal or are not subject to an AMR.

## **2.3 SYSTEM SCOPING AND SCREENING RESULTS – MECHANICAL SYSTEMS**

### **2.3.3 Auxiliary Systems**

#### RAI 2.3.3 - 15

The license renewal rule, 10 CFR 50.54(a)(3), requires an applicant to include those structures, systems, and components (SSCs) that are relied on in a safety analysis or plant evaluation to perform a function which demonstrates compliance with 10 CFR 50.48, "Fire protection," to be included within the scope of the license. In general, operating licenses contain a license

condition for fire protection that defines the 10 CFR 50.48 fire protection program. The license condition states that the licensee "shall implement and maintain in effect the provisions of the approved fire protection program" as described in the UFSAR and/or as approved in a safety analysis.

Comparing the applicable information contained in the LRA with the UFSAR, the staff identified SSCs in the UFSAR that were not included within the scope of license renewal. A sampling review by staff has identified the hydropneumatic tank and appurtenances (provides pressure maintenance for fire water system), and nitrogen tank for gaseous suppression system (pilot pressure for system actuation) that are included in the safety analysis, yet were not identified to be within the scope of license renewal.

Clarify the current licencing basis, consistent with 10 CFR 50.48, with respect to scoping for license renewal. Using the examples above, justify why SSCs listed in the UFSAR are considered to be outside the scope of license renewal.

## **APPENDIX B AGING MANAGEMENT PROGRAMS**

### **B.3.1.5 Small Bore Class 1 Piping Inspection**

#### **B.3.1.5 - 1**

In Appendix B, Section 3.1.5, of the LRA, the applicant states that volumetric inspections of small bore Class 1 piping will be conducted on a sampling basis. The one-time inspection program states that locations selected for volumetric inspection will be based on a risk-informed approach that ranks the susceptibility of the small bore Class 1 piping according to two essential elements: (1) a degradation mechanism evaluation to assess the failure potential of the piping system under consideration; and (2) a consequence evaluation to assess the impact on plant safety in the event of a piping failure. Provide the following additional information as the information relates to your program attributes for aging management program B.3.1.5, "Small Bore Class 1 Piping Inspection:"

- Discuss what methodology will be used to determine the greatest potential failure susceptibility locations and discuss how the worst-case consequence locations for the small bore piping will be determined. Discuss how these two essential risk-informed elements will be used to quantify the susceptibility rankings of the small bore Class 1 piping within the scope of the Small Bore Class 1 Piping Inspection.
- Explain which documents or information will be used to define the sample size for the volumetric inspections that will be proposed for the small bore Class 1 piping.