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

August 15, 2002

L-2002-117
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 2
Consolidated Line Item Improvement Process
TSTF-358 - Missed Surveillance Requirements

By letter L-2001-250 dated November 21, 2001 and supplemented by L-2002-02 on January 25, 2002, 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). Implementation of the CLIIP, for plants that have not adopted the Standard Technical Specifications (STS) format, requires relocation of a portion of the existing Surveillance Requirement (SR) 4.0.3 to SR 4.0.1 to closely conform with the STS. By this letter, FPL is submitting revised wording for the TS and the TS Bases for Surveillance Requirements 4.0.1 and 4.0.3.

Attachment 1 is a description of the additional conforming changes necessary to implement TSTF-358. Attachment 2 is a No Significant Hazards and Environmental Considerations for the additional conforming changes. The generic CLIIP safety evaluation, No Significant Hazards Consideration, and Environmental Consideration referenced in the original FPL submittal L-2001-250 as supplemented by L-2002-02 bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted. Attachment 3 includes marked up copies of the existing Unit 1 and Unit 2 SR 4.0.1 and SR 4.0.3 for TSTF-358 implementation and the additional conforming amendments. Attachment 4 includes informational copies of the proposed revisions to the Unit 1 and Unit 2 TS Bases for SR 4.0.1 and SR 4.0.3 for TSTF-358 and the additional conforming amendments. Attachment 5 includes copies of the retyped Unit 1 and Unit 2 TS pages.

The St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board have reviewed the proposed amendments. In accordance with 10 CFR

A001

50.91 (b)(1), copies of the proposed amendments are being forwarded to the State Designee for the State of Florida.

If you should have any questions regarding this submittal, please contact George Madden at 772-467-7155.

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

Attachments

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

ATTACHMENT 1

DESCRIPTION OF AMENDMENT REQUESTS

DESCRIPTION OF AMENDMENT REQUESTS

Introduction: The proposed license amendments (PLAs) to Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 proposed by FPL letter L-2001-250 dated November 21, 2001 and supplemented by FPL letter 2002-02 dated January 25, 2002 conform closely to the industry and NRC approved TSTF-358 Revision 6. Based on discussions with the NRC staff, plants that have not adopted the Standard Technical Specifications require plant specific conforming changes to implement TSTF-358. For St. Lucie Units 1 and 2, the additional changes are administrative conforming amendments to Surveillance Requirement (SR) 4.0.1. The additional changes relocate existing requirements from SR 4.0.3 to SR 4.0.1. The proposed changes conform closely to the industry and NRC approved NUREG-1432, *Standard Technical Specifications Combustion Engineering Plant*s, Revision 2 and TSTF-358 Revision 6. The generic CLIIP safety evaluation, no significant hazards consideration, and environmental consideration referenced in the original FPL submittal L-2001-250, as supplemented by L-2002-02, bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted.

Background: 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 letter L-2002-02 dated January 25, 2002, FPL submitted revised wording for Surveillance Requirement 4.0.3 and the Bases for Surveillance Requirement 4.0.3 to closely conform to the wording of TSTF-358 with the following exceptions. 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".

During the spring of 2002, the NRC was working with specific utilities to develop a model for implementing the TSTF-358 CLIIP for plants that had not converted to the Standard Technical Specifications. In June, the staff determined that for plants that had not converted to the STS, there was not sufficient consistency between the plants to develop a model applicable to all the plants. The generic CLIIP safety evaluation, no significant hazards consideration, and environmental consideration referenced in the original FPL

submittal L-2001-250, as supplemented by L-2002-02, bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted.

For St. Lucie Units 1 and 2 the conforming changes required to implement TSTF-358 include relocating two requirements from SR 4.0.3 to SR 4.0.1. These requirements relate to surveillance interval extensions such that failure to perform surveillance tests within the surveillance interval and the allowable extension of 25 percent as specified in SR 4.0.2 constitutes noncompliance with the operability requirements of the Limiting Condition for Operation. The second requirement is the exception that surveillance tests do not need to be performed on inoperable equipment. These requirements are relocated from SR 4.0.3 to SR 4.0.1 to closely conform to the STS.

Description of the Changes:

1. Relocate the following sentence from SR 4.0.3 to the end of SR 4.0.1:

   Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation.

2. Relocate the following sentence from SR 4.0.3 to end of SR 4.0.1:

   Surveillance Requirements do not have to be performed on inoperable equipment.

The changes to SR 4.0.3 proposed by FPL letters L-2001-250, as supplemented by FPL letter L-2002-02, remain unchanged by this submittal.

Justification of the Changes: The changes are administrative conforming amendments necessary to implement TSTF-358. The proposed changes relocate requirements from SR 4.0.3 to SR 4.0.1. By making the proposed changes, the St. Lucie Unit 1 and 2 SR 4.0.3 and SR 4.0.1 will closely conform to the STS NUREG-1432 SR 3.0.1 and SR 3.0.3.

The generic CLIIP safety evaluation, no significant hazards consideration, and environmental consideration referenced in the original FPL submittal L-2001-250, as supplemented by L-2002-02, bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted.

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Amendment Request

The additional changes to proposed license amendments (PLAs) to Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 are administrative conforming amendments to Surveillance Requirement (SR) 4.0.1. The additional changes relocate existing requirements from SR 4.0.3 to SR 4.0.1. The proposed changes conform closely to the industry and NRC approved NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*, Revision 2. The generic CLIIP safety evaluation, no significant hazards consideration, and environmental consideration referenced in the original FPL submittal L-2001-250 as supplemented by L-2002-02 bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted.

Determination of No Significant Hazards Consideration

Pursuant to 10 CFR 50.92, a determination may be made that a proposed license amendments involve no significant hazards consideration if operation of the facility in accordance with the proposed amendments 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) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendments are administrative in nature and they do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. These proposed changes do not change the existing administrative controls on performance of Surveillance Requirements. The changes only relocate the existing requirements to SR 4.0.1 to closely conform to the Standard Technical Specifications. Further, the proposed changes do not alter the design, function, or operation of any plant component. Therefore, operation of the facility in accordance with the proposed amendments 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 amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes being proposed are administrative in nature and do not introduce a new mode of plant operation or surveillance requirement, nor involve a physical modification to the plant. Therefore, the design, function, or operation of any plant component is not altered. The changes propose to relocate specific controls from SR 4.0.3 to SR 4.0.1 to closely conform to the Standard Technical Specifications. Therefore, operation of the facility in accordance with the proposed amendments 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 amendments would not involve a significant reduction in a margin of safety.

The proposed changes conform closely to the industry and NRC approved TSTF-358 and relates to the relocation of TS specific controls for Surveillance Requirements from SR 4.0.3 to SR 4.0.1. The specific controls are not changed only relocated to closely conform to the Standard Technical Specifications. Therefore, operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

Based on the above discussion and the supporting evaluation of Technical Specification changes, FPL has determined that the proposed license amendments involve no significant hazards consideration. The generic CLIIP no significant hazards consideration referenced in the original FPL submittal L-2001-250, as supplemented by L-2002-02, bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted.

Environmental Consideration

FPL has reviewed the proposed Technical Specification changes against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes are administrative conforming amendments. FPL concludes that the proposed Technical Specifications changes meet the criteria set forth in 10 CFR 51.22(c)(10) for a categorical exclusion from the requirements for an environmental impact statement or environmental assessment, as this request proposes changes to recordkeeping, reporting, or administrative procedures or requirements. Therefore, pursuant to 10 CFR 51.22(b) an environmental impact statement or an environmental assessment is not required. The generic CLIIP environmental consideration referenced in the original FPL submittal L-2001-250, as supplemented by L-2002-02, bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted.

Conclusion

The generic CLIIP safety evaluation, no significant hazards consideration, and environmental consideration referenced in the original FPL submittal L-2001-250, as supplemented by L-2002-02, bound the changes to implement TSTF-358 and still apply for the changes that were previously submitted. 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.

ATTACHMENT 3

ST. LUCIE UNITS 1 AND 2 MARKED UP TECHNICAL SPECIFICATION PAGES

Unit 1 TS Page

3/4 0-2

Unit 2 TS Page

3/4 0-2

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 for 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 for 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 for Operation must immediately be declared not met, and the applicable ACTION(s) must be taken.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION ~~requirements are applicable at the time it is identified~~ that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements ~~are less than 24 hours~~. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50 55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g) (6) (i).

b. deleted

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowable surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

INSERT 1 New SR 4.0.3

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

deleted

4.0.5 Surveillance Requirements for inservice inspection of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50 55a(g) (6) (i).

b. deleted

c. deleted

ATTACHMENT 4

ST. LUCIE UNITS 1 AND 2 MARKED UP

TECHNICAL SPECIFICATION BASES PAGES

Unit 1 Bases

4.0.1
4.0.3

Unit 2 Bases

4.0.1
4.0.3

FOR INFORMATION ONLY

REVISED BASES INSERT 1 (Completely replaces existing the Bases for SR 4.0.1)

SR 4.0.1 establishes the requirement that Surveillance Requirements (SR) must be met during the MODES or other specified conditions in the applicability for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual SRs. This Specification is to ensure that SRs are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a SR within the specified frequency, in accordance with SR 4.0.2, constitutes a failure to meet a Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when either:

a. the systems or components are known to be inoperable, although still meeting the SRs, or
b. the requirements of the SR(s) are known to be not met between required SR performances.

SRs do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The SRs associated with a SPECIAL TEST EXCEPTION (STE) are only applicable when the STE is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

SRs, including SRs invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. SRs have to be met and performed in accordance with SR 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable SRs are not failed and their most recent performance is in accordance with SR 4.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process follow.

a. Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 800 psi. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

b. High pressure safety injection (HPSI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPSI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

REVISED BASES INSERT 2 (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 SR 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 SR 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 SRs that have been missed. This delay period permits the completion of a SRs requirement before complying with required ACTION(s) or other remedial measures that might preclude completion of the SR.

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

When a SR 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 SR. However, since there is not a time interval specified, the missed SR should be performed at the first reasonable opportunity.

SR 4.0.3 provides a time limit for, and allowances for the performance of, a SR 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 SR 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 SR) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the SR. 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 SRs 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 SR will be placed in the licensee's Corrective Action Program.

If a SR 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 for 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 for Operation begin immediately upon the failure of the surveillance.

Completion of the SR within the delay period allowed by this specification, or within the completion time of the ACTIONS, restores compliance with SR 4.0.1.

SECTION NO: 3.0 & 4.0	TITLE. TECHNICAL SPECIFICATIONS BASES ATTACHMENT 2 OF ADM-25.04 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 1	PAGE: 8 of 11
REVISION NO.. 0		

3/4.0 APPLICABILITY (continued)

BASES (continued)

Replace with Bases Insert

4.0.1 This specification establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test exception is used as an allowable exception to the requirements of a specification.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

SECTION NO: 3.0 & 4.0	TITLE TECHNICAL SPECIFICATIONS BASES ATTACHMENT 2 OF ADM-25.04 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 1	PAGE. 9 of 11
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3/4.0 APPLICABILITY (continued)

BASES (continued) Replace with Bases INSERT 2

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action.

SECTION NO: 3.0 & 4.0	TITLE TECHNICAL SPECIFICATIONS BASES ATTACHMENT 2 OF ADM-25.04 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 1	PAGE 10 of 11
REVISION NO: 0		

3/4.0 APPLICABILITY (continued)

BASES (continued)

Delete

4.03 (continued)

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

SECTION NO: 3.0 & 4.0	TITLE	PAGE
REVISION NO: 0	TECHNICAL SPECIFICATIONS BASES ATTACHMENT 2 OF ADM-25.04 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 2	8 of 10

3/4.0 APPLICABILITY (continued)

BASES (continued)

Replace with BASES INSERT 1

4.0.1 This specification establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test exception is used as an allowable exception to the requirements of a specification.

4.0.2 This specification establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified within an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

SECTION NO: 3.0 & 4.0	TITLE TECHNICAL SPECIFICATIONS BASES ATTACHMENT 2 OF ADM-25.04 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 2	PAGE 9 of 10
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3/4.0 APPLICABILITY (continued)

BASES (continued)

Replace with Base Insert 2

4.0.3 ~~This specification establishes~~ the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measure would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

SECTION NO: 3.0 & 4.0	TITLE	PAGE:
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3/4.0 APPLICABILITY (continued)

BASES (continued)

4.0.3 (continued) delete

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

4.0.4 This specification establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition or operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower MODE of operation.

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2 and 3 components will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not part of these Technical Specifications.

ATTACHMENT 5

ST. LUCIE UNITS 1 AND 2 RETYPED TECHNICAL SPECIFICATION PAGES

Unit 1 TS Page

3/4 0-2

Unit 2 TS Page

3/4 0-2

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. Surveillance Requirements do not have to be performed on inoperable equipment

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

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

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50 55a(g) (6) (i).

b. *deleted*

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to perform a Surveillance Requirement within the allowable surveillance interval, defined by Specification 4 0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

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.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements

4.0 5 Surveillance Requirements for inservice inspection of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g) (6) (i)

b. deleted

c. deleted