



March 31, 2005

L-2005-029
10 CFR 50.90

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

RE: St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment
Containment Leakage Rate Program
One-Time Type A Test Interval Extension

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating License NPF-16 for St. Lucie Unit 2. The proposed amendment revises Administrative Technical Specification (TS) Section 6.8.4.h, Containment Leakage Rate Testing Program, to revise an exception to the commitment to follow the guidelines of Regulatory Guide (RG) 1.163, Performance-Based Containment Leak-Test Program. This exception is based on information in the proposal for the 15-year Type A integrated leak rate test (ILRT) surveillance interval and NEI 94-01, Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J. The effect will be a one-time extension from the currently approved 15-year interval since the last Type A test to approximately a 15.5-year interval since the last Type A test. The last St. Lucie Unit 2 Type A test was performed in June 1992. The next ILRT will be required to be performed prior to start-up from the fall 2007 refueling outage (SL2-17). Refueling outage SL2-17 is the scheduled reactor pressure vessel head (RPVH) and steam generator replacement (SGR) outage for St. Lucie Unit 2. SL2-17 is currently scheduled to end in late December 2007. The current TS requires the ILRT to be performed no later than June 2007, which is four months before the start of the RPVH and SGR outage.

Attachment 1 is a description of the proposed changes and the supporting justification. Attachment 2 is the Determination of No Significant Hazards and Environmental Considerations. Attachment 3 includes the marked up copy of the proposed Technical Specification change. Attachment 4 is a copy of the retyped TS page.

The St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board have reviewed the proposed amendment.

In accordance with 10 CFR 50.91 (b)(1), a copy of the proposed amendment is being forwarded to the State Designee for the State of Florida.

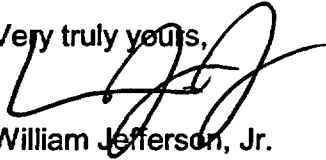
Approval of this proposed license amendment is requested by April 2006 to support planning for the spring 2006 refueling outage. If the proposed amendment is not approved

A001
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St. Lucie Unit 2
Docket No. 50-389
L-2005-029 Page 2

as requested, the ILRT will need to be performed in the spring 2006 refueling outage (SL2-16). This is 14 months prior to the current surveillance due date. Please issue the amendment to be effective on the date of issuance and to be implemented within 60 days of receipt by FPL. Please contact George Madden at 772-467-7155 if there are any questions about this submittal.

Very truly yours,



William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/GRM

Attachments

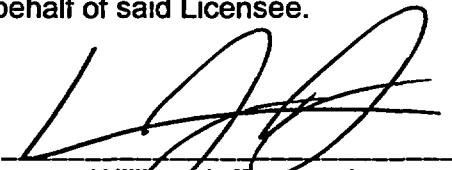
cc: Mr. William A. Passetti, Florida Department of Health

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

William Jefferson, Jr. being first duly sworn, deposes and says:

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

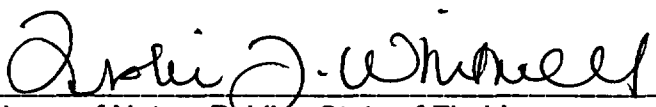
That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.



William Jefferson, Jr.

STATE OF FLORIDA
COUNTY OF ST LUCIE

Sworn to and subscribed before me
this 31 day of March, 2005
by William Jefferson, Jr., who is personally known to me.



Name of Notary Public - State of Florida

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

(Print, type or stamp Commissioned Name of Notary Public)

ATTACHMENT 1

DESCRIPTION OF THE PROPOSED CHANGES AND JUSTIFICATION

INTRODUCTION

The proposed amendment modifies the Administrative Technical Specification (TS) Section 6.8.4.h, Containment Leakage Rate Testing Program, to change exception (b) to the guidelines of Regulatory Guide (RG) 1.163¹. This exception is based on information in the proposal for the 15-year Type A integrated leak rate test (ILRT) surveillance interval and NEI 94-01². The effect will be a one-time extension from the currently approved 15-year interval since the last Type A test to approximately a 16 year interval since the last Type A Test. The last St. Lucie Unit 2 Type A Test was performed in June 1992. The proposed ILRT due date will be required prior to start-up from the fall 2007 refueling outage (SL2-17). Refueling outage SL2-17 is the scheduled reactor pressure vessel head (RPVH) and steam generator replacement (SGR) outage for St. Lucie Unit 2. The current TS requires the ILRT to be performed no later than June 2007, which is four months before the RPVH and SGR outage.

BACKGROUND

The testing requirements of 10 CFR 50, Appendix J, provide assurance that leakage through the containment, including systems and components that penetrate containment, does not exceed design values anticipated up to and including the design basis accident. The integrated leakage rate test (ILRT), or Type A test as referred to in 10 CFR 50, Appendix J, is primarily an overall test of the containment structure.

10 CFR 50 Appendix J was revised effective October 26, 1995 to allow use of Option B, Performance-Based Requirements. Regulatory Guide 1.163 provides an acceptable method to the NRC for compliance with the performance based option by the use of NEI 94-01 Revision 0, Industry Guideline for Implementing Performance Based-Option of 10 CFR 50 Appendix J, including the performance criteria for test interval selection.

NEI 94-01, Revision 0, allows an extended test interval of 10 years, based on two consecutive successful tests. There have been four ILRTs performed on Unit 2, all of which have been successful. Therefore, in 1997, St. Lucie Unit 2 was placed on the extended surveillance interval of 10 years.

In 2003, St. Lucie Units 1 and 2 received approval of Technical Specification amendments 187 and 130, respectively, which allowed a one-time increase in the ILRT surveillance interval from 10 years to 15 years. This change was evaluated utilizing a risk-based approach that demonstrated that there was only a minimal increase in risk. This agreed

¹ Regulatory Guide 1.163, Performance-Based Containment Leak-Test Program, September 1995.

² NEI 94-01, Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J, Rev. 0, July 1995.

with the generic analysis of NUREG-1493³, Performance-Based Containment Leak-Test Program. NUREG-1493 concluded that reducing the frequency to only once in 20 years would lead to an imperceptible increase in risk. A specific due date of June 2007 was included in the Technical Specifications for the Unit 2 amendment. Since there is no grace period for the surveillance, the ILRT must currently be performed in SL2-16 outage tentatively scheduled to start in April 2006.

Subsequent to the approval of the one-time 15-year ILRT surveillance interval, it was determined that Unit 2 would be required to replace both the reactor vessel head and the steam generators. These projects have been slated for the SL2-17 refueling outage that is scheduled to begin in late October 2007 and finish in December 2007. This was the earliest opportunity that this project could reasonably be scheduled, given the fabrication lead times and project planning requirements.

Replacement of the reactor pressure vessel head and steam generators requires that the containment be cut open for removal and installation of these components. This will necessitate that an ILRT be performed as part of the post-modification testing for the containment structure and appurtenances. In order to eliminate performing ILRTs in back to back outages, it is proposed that the current Technical Specification wording be amended to extend the due date to startup following the SL2-17 outage. The result would be that the currently approved ILRT surveillance interval would only have to be extended approximately six months in order to eliminate performing a redundant and costly test in SL2-16.

DESCRIPTION OF PROPOSED CHANGE

The proposed amendment to the Unit 2 Administrative Technical Specification 6.8.4.h would revise an exception (b) to the commitment to follow the guidelines of RG 1.163. This exception is based on information in the proposal for the 15-year ILRT surveillance interval and NEI 94-01 in which the effect will be an extension from the currently approved 15-year interval (from the last ILRT) to the startup of Unit 2 following the SL2-17 outage. A marked up copy of the Technical Specification page for this proposed change is included in this submittal.

FPL proposes to revise the St. Lucie Unit 2 Technical Specification 6.8.4.h as follows:

Current Unit 2

...This program is in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," as modified by the following exception(s):

- a. Bechtel Topical Report, BN-TOP-1 or ANS 56.8-1994 (as recommended by R.G. 1.163) will be used for Type A testing.

³ NUREG-1493, Performance-Based Containment Leak-Test Program, September 1995.

- b. The first Type A test performed after the June 1992 Type A test shall be no later than June 2007.

Unit 2 Revised

...This program is in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," as modified by the following exception(s):

- a. Bechtel Topical Report, BN-TOP-1 or ANS 56.8-1994 (as recommended by R.G. 1.163) will be used for Type A testing.
- b. The first Type A test performed after the June 1992 Type A test shall be prior to startup following the SL2-17 refueling outage.

JUSTIFICATION FOR THE PROPOSED CHANGE

The proposed change to extend the ILRT surveillance interval is justified based on assessment of the containment structural condition utilizing ILRT historical results and containment inspection programs and is supported by risk-informed analysis.

ILRT Historical Results

The results of the previous Type A tests (ILRTs) for St. Lucie Unit 2 are reported below. Data is reported using the 95% confidence level estimate. The maximum allowable containment leakage rate (L_a) is 0.5% of containment air weight per day (Wt%/day) for Unit 2 as described in the Technical Specifications.

Unit 2 ILRT Data

| Date | Leak Rate (Wt%/day) | Original 10CFR50 App J Acceptance Criteria (Wt%/day) | NEI 94-01 As-Found Acceptance Criteria (Wt%/day) |
|-------------------------|---------------------|--|--|
| 12/2/1982* | 0.026 | 0.375 | 0.5 |
| 5/17/1986 ^{§†} | 0.092 | 0.263 | NA |
| 4/3/1989 ^{£†} | 0.117 | 0.375 | 0.5 |
| 6/17/1992 ^{£†} | 0.053 | 0.375 | 0.5 |

- * Pre-operational test
- § Reduced pressure test
- £ Test results obtained using BN-TOP-1
- † Includes difference of as-found/as-left LLRT results (IN 85-71)

All four Type A tests performed on St. Lucie Unit 2 passed the as-found acceptance criteria with considerable margin. It should be noted that the later results reflect the addition of

calculation conservatism due to the use of the BN-TOP-1 methodology and the addition of the negative difference in leakage resulting from LLRTs performed due to maintenance prior to the respective ILRT. These results demonstrate a history of satisfactory performance of both the leak tight capability and structural integrity of the containment vessel.

Containment Visual Inspection

The St. Lucie containment vessel is examined in accordance with the requirements of ASME Code Section XI, Subsection IWE⁴, the plant protective coatings program, and the Containment Leakage Rate Test Program. These inspection processes are described as follows.

Historically, the ILRT was preceded by a visual inspection of containment thus ensuring that the inspection was performed three times in 10 years. Following the adoption of Option B to 10 CFR 50, when the ILRT surveillance interval was extended to 10 years, the general visual inspections of both sides of the accessible containment vessel surface and the shield building were maintained on the previous frequency of three times in 10 years. At that time, the requirement for these inspections was relocated from Technical Specifications to the containment leakage rate testing program. This original inspection frequency was also maintained subsequent to approval of the one-time 15-year ILRT surveillance interval. The results of these inspections indicate that there have been no significant deficiencies in the structural integrity or material condition of the containment vessel and only minor coatings issues.

There have been two conditions identified by other inspection processes, which relate to the material condition of the containment boundary. The first condition documented in St. Lucie Plant Condition Report 97-0890, concerned deterioration of the moisture barrier at the interface of the concrete floor and containment vessel. Areas were selected at various points where the moisture barrier exhibited cracking and/or partial disbonding from the vessel or slab, and the sealant material was removed to allow inspection of the containment vessel. Generally, only staining or light surface corrosion was noted with a few instances of pitting observed. Evaluations have determined that the localized areas of concern do not represent an issue with respect to the integrity of the containment vessel. The site corrective action program has been utilized to track additional inspections and provides a long term plan for any required material improvements or repairs to the moisture barrier and the containment vessel. One third of the moisture barrier at the concrete floor to vessel interface on both sides of containment is inspected during each inspection period of the St. Lucie ASME Section XI, ISI-IWE Plan. Two thirds of the Unit 2 moisture barrier have been inspected, as of the spring 2003 refueling outage, with results similar to or less significant than the originally inspected areas. The second condition involved external corrosion, due to moisture accumulation from condensation, on the component cooling water penetrations to containment as initially documented in Condition Report 97-1799.

⁴ ASME Section XI, Subsection IWE, Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Plants, 1992 Edition.

Corrective actions included removal of corrosion products, inspection of components and respective thickness measurements, application of protective coatings, and installation of anti-sweat insulation. Corrective actions, inspections, and evaluation of inspection results implemented on the most affected penetrations have provided objective evidence that the piping degradation is minor and a large thickness margin is available before encroaching upon design requirements. Based on these results, the remaining penetrations are in satisfactory condition. Completion of corrective actions for the remaining penetrations is being tracked by the site corrective action program. Both of these conditions were identified prior to implementation of the IWE inspection program at St. Lucie. Based on the inspections, repairs, and evaluation of these issues it has been determined that augmented inspection was not required in accordance with IWE-1240.

The ASME Section XI, Subsection IWE inspection plan was implemented for St. Lucie Unit 2 on August 9, 2000. All inspections have been completed for the second period of the initial 10-year surveillance interval. The IWE program performs inspection of the entire accessible interior surface of the containment in each of three periods within a 10 year surveillance interval. The 100% general surface area inspection was completed for the first period in April 2000 and second period in November 2001 on Unit 2. The results were satisfactory with no indications of significant degradation. There are currently no areas identified that require augmented inspection in accordance with IWE-1240.

The containment inservice inspection program at St. Lucie Unit 2 is described in detail in ISI/IWE-PSL-1/2-PROGRAM, Metal Containment Inservice Inspection Program, which provides the rules and requirements. The specific areas and components scheduled for inspection in accordance with the program are provided in ISI/IWE-PSL-2-PLAN, ASME Section XI, Subsection IWE Containment Building Metal Containment Inservice Inspection Plan for St Lucie Unit 2. The program requirements include inspection of containment surfaces, pressure retaining welds, bolting, seals, gaskets, and moisture barriers using visual, surface, and volumetric techniques as required. Examinations that detect flaws or evidence of degradation shall be documented through the site corrective action process and dispositioned in accordance with the requirements of IWE-3000. Personnel performing NDE shall be qualified and certified in accordance with IWA-2300 of the 1992 Edition with 1992 Addenda of ASME Section XI and implemented by CSI-QI-9.1, Qualification and Certification of Nondestructive Examination Personnel.

During activities that require repair of the containment vessel coatings, ASME Section XI, Subsection IWE requires visual exams to assess the condition of the vessel metal surface for evidence of flaking, blistering, peeling, discoloration, and other signs of distress. Prior to any repair, an inspection is performed by NDE personnel to assess the condition of the base material. Following completion of coating repairs, a final inspection is performed by NDE personnel to determine acceptability of the final condition and to act as a reference for future inspections. There has been no indication of containment vessel metal degradation on either unit resulting from these types of inspections.

The protective coatings program at St. Lucie requires that a walkdown of the containment interior be performed each refueling outage by the FPL coatings specialist and Engineering to inspect any existing areas of non-qualified coatings and to determine any other areas in need of repair. The accessible exterior containment surface is inspected by personnel familiar with the ASTM coatings standards in accordance with plant procedures. Portions of the upper exterior containment vessel surface are not normally accessible for inspection due to the unavailability of sufficient installed ladders or platforms and so the containment external surface above the floor is not inspected each outage. Inspections of the upper exterior surface of the containment have been performed during previous outages. Inspection of the upper section of the exterior side of the containment vessel identified no degraded areas and no potential means by which corrosion would be promoted such as moisture sources or equipment interface. Those areas identified by inspection which do not meet acceptance criteria are evaluated and scheduled for repair as necessary. Following repairs, containment vessel coatings are re-examined upon completion by certified NDE examiners and the as-left condition documented. This allows identification of any potential for containment vessel degradation. As previously stated, there have been no indications of significant degradation of the containment vessel base metal.

Summary of Plant Specific Risk Evaluation

The risk-informed basis for extending the ILRT surveillance interval is generically addressed by NUREG-1493, which provided the technical basis for NEI 94-01 allowing the original extension of up to 10 years for the ILRT surveillance interval. The NUREG stated that reducing the frequency to once in 20 years between tests would lead to an imperceptible increase in risk.

FPL has performed a site specific risk assessment for extending the ILRT surveillance interval until the end of the SL2-17 refueling outage (approximately an additional six months). Regulatory Guide 1.174⁵ defines very small changes in risk as resulting in CDF of less than 1E-06/yr and increases in LERF of less than 1E-07/yr. Since the ILRT does not impact CDF, the relevant metric is LERF. The calculation shows that the reduction in Type A test (ILRT) frequency to once in 16 years from the current once in 15 years results in a change in LERF of 5.94E-09 per year for Unit 2. The cumulative increase in LERF resulting from a change in the ILRT frequency from the original three times in 10 years to once in 16 years is estimated to be 9.5E-08 per year. This is considered a "very small change" in LERF, below the criteria presented in RG 1.174 and RG 1.177⁶, and therefore is concluded to be non-risk significant. In addition, the calculation shows a minimal increase in population dose of 0.0019 person-rem/yr and a minimal percent change in conditional containment failure probability (CCFP) of 0.03% due to the change in ILRT surveillance interval from 15 years to 16 years for Unit 2. The cumulative increase in population dose and percent change in CCFP resulting from a change in the ILRT

5 Regulatory Guide 1.174, An Approach for Using Probabilistic Risk Assessment In Risk-Informed Decisions On Plant-Specific Changes to the Licensing Basis, July 1998.

6 Regulatory Guide 1.177, An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications, August 1998.

St. Lucie Unit 2
Docket No. 50-389
L-2005-029 Attachment 1 Page 7

frequency from the original three times in 10 years to once in 16 years is estimated to be .03 person-rem/yr and 0.49%, respectively.

This proposal is similar to the previous license amendment request submitted by St. Lucie for a one-time extension of the ILRT surveillance to 15 years⁷.

CONCLUSION

The proposed Technical Specification changes regarding the exception to RG 1.163 and NEI-94-01 requirements that would extend the ILRT surveillance interval are considered to be acceptable. Analysis demonstrates that only a minimal increase in the relevant risk metrics would result from the proposed change. Historical ILRT data and a continuing containment inspection program coupled with LLRT of the individual containment penetrations provide assurance of the leak tight integrity of the containment vessel.

⁷ FPL letter L-2002-143, from D. E. Jernigan to USNRC dated August 15, 2002, Proposed License Amendments – Risk-Informed One-Time Increase In Integrated Leak Rate Test Surveillance Interval

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Introduction

The proposed amendment modifies the Administrative Technical Specification (TS) Section 6.8.4.h, Containment Leakage Rate Testing Program, to change exception (b) to the guidelines of Regulatory Guide (RG) 1.163, Performance-Based Containment Leak-Test Program. This exception is based on information in the proposal for the 15-year Type A integrated leak rate test (ILRT) surveillance interval and NEI 94-01, Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J. The effect will be a one-time extension from the currently approved 15-year interval since the last Type A test to approximately a 16-year interval since the last Type A test. The last St. Lucie Unit 2 Type A test was performed in June 1992. The proposed ILRT due date will be required prior to start-up from the fall 2007 refueling outage (SL2-17). Refueling outage SL2-17 is the scheduled reactor pressure vessel head (RPVH) and steam generator replacement (SGR) outage for St. Lucie Unit 2. The current TS requires the ILRT to be performed no later than June 2007, which is four months before the RPVH and SGR outage.

Determination of No Significant Hazards Consideration

The standards used to arrive at a determination that a request for amendment involves a no significant hazards consideration are included in the Commission's regulation, 10 CFR 50.92, which states that no significant hazards considerations are involved if the 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; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed as follows:

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

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment of the Technical Specifications adds a one-time extension to the current surveillance interval for Type A testing (ILRT). The current test interval of 15 years from the last Type A test would be extended to end prior to startup from the SL2-17 refueling. This is anticipated to be an approximately six-month addition to the 15 year interval. The proposed extension to the Type A testing interval does not significantly increase the probability of an accident previously evaluated since the containment Type A test is not a modification, nor a change in the way that plant systems, structures or components (SSC) are operated, and is not an activity that could lead

to equipment failure or accident initiation. The proposed extension of the test interval does not involve a significant increase in the consequences of an accident since research documented in NUREG-1493 has found that generically, very few potential leak paths are not identified with Type B and C tests (LLRT). The Type B and C testing are unaffected by this proposed change. The NUREG concluded that an increase in the Type A test interval to twenty years resulted in an imperceptible increase in risk. St. Lucie Unit 2 provides a high degree of assurance through testing and inspection that the containment will not degrade in a manner only detectable by Type A testing. Inspections required by the ASME Code, the containment leakage rate testing program, the plant protective coatings program, and Maintenance Rule are performed in order to identify indications of containment degradation that could affect leak tightness. Type B and C testing required by 10 CFR 50, Appendix J, are not affected by this proposed extension to the Type A test interval and will identify openings in containment penetrations that would otherwise require a Type A test.

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

The proposed change does not result in facility operation that would create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed extension to Type A testing does not create a new or different type of accident for St. Lucie because no physical plant changes are made and no compensatory measures are being imposed that could potentially lead to a failure. There are no operational changes that could introduce a new failure mode or create a new or different kind of accident. The proposed change only adds an extension to the current interval for Type A testing and does not change implementation aspects of the test.

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

The proposed change would not result in operation of the facility involving a significant reduction in a margin of safety. The proposed license amendment adds a one-time extension to the current interval for Type A testing (ILRT). The current one-time test interval of 15 years from the last Type A test would be extended to end prior to startup from the SL2-17 refueling outage. This is anticipated to be an approximately six month addition to the 15 year interval. The NUREG-1493 generic study of the effects of extending the Type A test interval out to 20 years concluded that there is an imperceptible increase in plant risk. A plant specific risk calculation obtained results consistent with the generic conclusions regarding risk which show a slight but negligible increase in risk. Inspections required by the ASME code and maintenance rule are performed to ensure that the containment will not degrade in a manner that is only detectable by Type A testing (ILRT).

Based on the above, we have determined that the proposed amendment does 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 previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazards consideration.

Environmental Impact Consideration Determination

The proposed license amendment changes requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The proposed amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released off-site, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendment involves no significant hazards consideration, and therefore, meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendment.

St. Lucie Unit 2
Docket No. 50-389
L-2005-029 Attachment 3 Page 1

ATTACHMENT 3

ST. LUCIE UNIT 2 MARKED UP TECHNICAL SPECIFICATION PAGE

TS Page

6-15b

ADMINISTRATIVE CONTROLS

than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,

- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

g. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of the environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM.
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

h. Containment Leakage Rate Testing Program

A program to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J, Option B, as modified by approved exemptions. This program is in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," as modified by the following exception(s):

- a) Bechtel Topical Report, BN-TOP-1 or ANS 56.8-1994 (as recommended by R.G. 1.163) will be used for type A testing.
- b) The first Type A test performed after the June 1992 Type A test shall be ~~no later than June 2007~~ prior to startup following the SL2-17 refueling outage.

The peak calculated containment internal pressure for the design basis loss of coolant accident P_a , is 41.8 psig. The containment design pressure is 44 psig.

The maximum allow containment leakage rate, L_a , at P_a , shall be 0.50% of containment air weight per day.

St. Lucie Unit 2
Docket No. 50-389
L-2005-029 Attachment 4 Page 1

ATTACHMENT 4

ST. LUCIE UNIT 2 RETYPED TECHNICAL SPECIFICATION PAGE

The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

TS Page

6-15b

ADMINISTRATIVE CONTROLS

than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,

- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

g. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of the environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM.
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

h. Containment Leakage Rate Testing Program

A program to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J, Option B, as modified by approved exemptions. This program is in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," as modified by the following exception(s):

- a) Bechtel Topical Report, BN-TOP-1 or ANS 56.8-1994 (as recommended by R.G. 1.163) will be used for type A testing.
- b) The first Type A test performed after the June 1992 Type A test shall be prior to startup following the SL2-17 refueling outage.

The peak calculated containment internal pressure for the design basis loss of coolant accident P_a , is 41.8 psig. The containment design pressure is 44 psig.

The maximum allow containment leakage rate, L_a , at P_a , shall be 0.50% of containment air weight per day.