September 27, 2005

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

SUBJECT: ST. LUCIE UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS REGARDING CONTROL ROOM VENTILATION SYSTEM (TAC NOS. MC0886 AND MC0887)

Dear Mr. Stall:

The Commission has issued the enclosed Amendment Nos. 197 and 139 to Renewed Facility Operating License Nos. DPR-67 and NPF-16 for the St. Lucie Plant, Unit Nos. 1 and 2, respectively. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 18, 2003, as supplemented on August 25 and September 15, 2005.

The amendments revise TSs for the control room ventilation systems to model the Combustion Engineering Standard Technical Specifications, NUREG-1432. In addition, Table 3.3-6, Radiation Monitoring Instrumentation, in each unit's TSs is revised to resolve minor inconsistencies that resulted from changes associated with previously issued Amendments 184 (Unit 1) and 127 (Unit 2). The amendments also correct some minor typographical errors.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/
Brendan T. Moroney, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosures:
1. Amendment No. 197 to DPR-67
2. Amendment No. 139 to NPF-16
3. Safety Evaluation

cc w/enclosures: See next page

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FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 197
Renewed License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power & Light Company (the licensee), dated September 18, 2003, as supplemented August 25 and September 15, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Renewed Facility Operating License No. DPR-67 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 3.B to read as follows:

   B. Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 197, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/
Michael L. Marshall, Jr., Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 27, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 197

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-67

DOCKET NO. 50-335

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove Pages	Insert Pages
3/4 3-22	3/4 3-22
3/4 4-1d	3/4 4-1d
3/4 7-20	3/4 7-20
3/4 7-21	3/4 7-21
3/4 7-22	3/4 7-22
3/4 7-23	3/4 7-23
6-15b	6-15b
- - - -	6-15d

FLORIDA POWER & LIGHT COMPANY

ORLANDO UTILITIES COMMISSION OF

THE CITY OF ORLANDO, FLORIDA

AND

FLORIDA MUNICIPAL POWER AGENCY

DOCKET NO. 50-389

ST. LUCIE PLANT UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 139
Renewed License No. NPF-16

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated September 18, 2003, as supplemented August 25 and September 15, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Renewed Facility Operating License No. NPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 3.B to read as follows:

   B. Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 139, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/
Michael L. Marshall, Jr., Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: September 27, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 139

TO RENEWED FACILITY OPERATING LICENSE NO. NPF-16

DOCKET NO. 50-389

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

Remove Pages	Insert Pages
Index III	Index III
3/4 3-25	3/4 3-25
3/4 3-27	3/4 3-27
3/4 7-17	3/4 7-17
3/4 7-18	3/4 7-18
3/4 7-19	3/4 7-19
3/4 9-9	3/4 9-9
6-15d	6-15d
- - - -	6-15e

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 197 AND 139

TO RENEWED FACILITY OPERATING LICENSE NOS. DPR-67 AND NPF-16

FLORIDA POWER AND LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-339

1.0 INTRODUCTION

By letter dated September 18, 2003, as supplemented by letters dated August 25 and September 15, 2005, Florida Power and Light Company, et al., (FPL, the licensee) requested amendments to Renewed Operating License Nos. DPR-67 and NPF-16 for St. Lucie Units 1 and 2, respectively.

The licensee has determined that the assumptions made in the Unit 1 fuel handling accident (FHA) analysis that was used in support of previously approved Technical Specifications (TSs) changes related to the handling of "recently irradiated fuel" did not properly reflect TSs applicability requirements. The FHA analysis of record was documented and approved as part of TS Amendments 184 (Unit1) and 127 (Unit 2). The FHA analysis assumes the control room ventilation system is operable and that within 30 minutes outside air intake will be isolated and the system switched to a filtered recirculation mode of operation. Currently, the Unit 1 TSs have no requirement for control room ventilation operability in Modes 5 and 6, whereas the Unit 2 TSs have such a requirement. The proposed TSs are required in order to ensure that FHA analysis assumptions regarding control room ventilation system operability remain valid.

The proposed amendments would revise the TSs for the control room ventilation systems to model NUREG-1432, Standard Technical Specifications Combustion Engineering Plants (CE STSs). In addition, Table 3.3-6, Radiation Monitoring Instrumentation, in each unit's TSs is revised to resolve minor inconsistencies that resulted from changes associated with previously issued Amendments 184 (Unit 1) and 127 (Unit 2). The amendments also correct some minor typographical errors.

The licensee's supplementary submittals dated August 25 and September 15, 2005, provided clarifying information that did not change the scope of the proposed amendments as described in the original notice of proposed action published in the *Federal Register* and did not change the initial proposed no significant hazards determination.

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR), part 20.1302, "Compliance with dose limits for individual members of the public," states the licensee shall make or cause to be made, as appropriate, surveys of radiation levels in unrestricted and controlled areas and radioactive materials in effluents released to unrestricted and controlled areas to demonstrate compliance with the dose limits for individual members of the public.

Title 10 CFR 50.68(b)(6) requires that radiation monitors be provided in storage and associated handling areas when fuel is present to detect excessive radiation levels and to initiate appropriate safety actions.

Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants," presents methods acceptable to the U.S. Nuclear Regulatory Commission (NRC) for implementing NRC regulations in Appendix A to10 CFR Part 50 with regard to the design, testing and maintenance criteria for air filtration and adsorption equipment.

NUREG-1432, Standard Technical Specifications Combustion Engineering Plants, Revision 3, contain model standard technical specifications (STSs) that provide guidance for plant-specific TS improvements. Licensees are encouraged to upgrade their TSs to conform, to the extent practical, to the latest approved revision of the STSs. Licensees adopting portions of the STSs to revise existing TSs are encouraged to adopt all related requirements, as applicable, to achieve a high degree of standardization and consistency among TS requirements for facilities of similar design.

3.0 TECHNICAL EVALUATION

3.1 Unit 1 Proposed Changes

3.1.1 The following changes were proposed for TS 3/4.7.7, "Control Room Emergency Ventilation System":

- Limiting Condition for Operability (LCO) 3.7.7.1 applicability for Modes 5 and 6 and "During movement of irradiated fuel assemblies" is being added.

The LCO applicability is being expanded to include Modes 5 and 6 and during the movement of irradiated fuel assemblies. The licensee stated that this change is more conservative than the existing Unit 1 TSs, which has no applicability for these plant conditions. The licensee also stated that the FHA analysis of record, as documented and approved by the NRC in Unit 1 Amendment 184, assumes the operability of the control room ventilation system. The staff agrees that the change is more conservative and, therefore, finds the requested change acceptable.

- Actions for Modes 5 and 6 and "During movement of irradiated fuel assemblies" are being added.

The current TSs do not include any actions for these plant conditions. However, because of the addition of these conditions to the LCO applicability, it is appropriate, in the event the LCO is not met, for the TSs to include suitable action requirements if the control room emergency ventilation system is operable in Modes 5 and 6, or while irradiated fuel is being moved. The licensee noted that, although the FHA evaluated recently irradiated fuel, the proposed change is more conservative in that it requires system operability for the movement of irradiated fuel regardless of decay time. The staff agrees that the proposed change is more conservative and, therefore, finds it acceptable.

- Surveillance Requirement (SR) details associated with ventilation filter testing are being replaced with a reference to the Ventilation Filter testing Program.

Currently, SR 4.7.7.1 includes details for the surveillance testing of the control room ventilation system filter trains, including testing frequency and filter performance requirements. The CE STSs simplify these SRs by referring to a Ventilation Filter Testing Program (VFTP). The Bases of the CE STSs state, "The VFTP includes testing of HEPA [high-efficiency particulate air] filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal. Specific test frequencies and additional information are discussed in detail in the VFTP."

The proposed change will delete SRs associated with the filter testing of the control room ventilation systems. This change is administrative in that there is no change being proposed that would alter the current scope of the ventilation system testing, the method of testing, or the established acceptance criteria. The deleted SR details are captured in the newly created VFTP consistent with CE STSs. The staff concludes that the proposed change in presentation of these testing requirements is administrative and, therefore, is acceptable.

- Proposed deletion of SR 4.7.7.1.a (verification of control room air temperature less than or equal to120EF).

SR 4.7.4.1.a requires verification every 12 hours that control room air temperature is less than or equal to120EF. The licensee proposed deleting this SR on the basis that the surveillance does not appear in the CE STSs. In a June 24, 2004, request for additional information (RAI), the staff asked the licensee to provide a plant-specific technical justification for the deletion. In its August 25, 2005, response to the RAI, the licensee stated that "upon further review of this specification (including identification of a similar surveillance in the CE STS) St. Lucie Plant withdraws the request to delete Surveillance requirements 4.7.7.1.a (Unit 1) . . . from St. Lucie Plant TS." Therefore, the current SR 4.7.4.1.a remains valid and the staff plans no further action on this request.

- Proposed revision to SR 4.7.7.1.e.3 to allow for conducting the control room pressure test on a staggered test basis.

In the June 24, 2004, RAI, the staff asked the licensee to provide a plant-specific technical justification for the deletion. In its August 25, 2005, response to the RAI, the licensee stated "in light of NRC Generic Letter 2003-01, "Control Room" and its uncertain future requirements, St. Lucie withdraws for now our request to change the control room pressurization surveillance

interval to that as currently required by CE STS." Therefore, the current SR 4.7.4.1.e.3 remains valid and the staff plans no further action on this request.

3.1.2 The following changes were proposed for TS Table 3.3-6, "Radiation Monitoring Instrumentation":

- Applicability for the Containment Isolation System (CIS) monitor is being changed from "Mode 6" to "During movement of recently irradiated fuel assemblies within containment."

The licensee stated that, as a result of a TSs change associated with Unit 1 amendment 184, the LCO applicability associated with the CIS radiation monitors needs to be revised. These radiation monitors send a signal to the CIS to ensure that the containment isolation valves will be automatically isolated upon detection of high radiation levels within containment. The applicability is currently identified as Mode 6; however, the associated action statement is to comply with the action requirements of TS 3.9.9 (LCO for the CIS during refueling). Amendment 184 changed the applicability of TS 3.9.9 to "During the movement of recently irradiated fuel assemblies within containment." Therefore, as currently stated, the Mode 6 requirement for the CIS radiation monitor is inconsistent with the TS requirement for CIS operability. The proposed change is to revise the CIS radiation monitor "Applicable Mode" to "During movement of recently irradiated fuel within containment." The staff concludes that the proposed change eliminates the inconsistency between the requirements of Table 3.3-6 and TS 3.9.9.

The staff also reviewed the proposed change with particular attention to the requirements of 10 CFR 20.1302, "Compliance with dose limits for individual members of the public." The proposed change is acceptable because it is the staff's understanding that the licensee addresses radioactive releases in its off site dose calculation manual (ODCM) and that the potential release from a FHA will be monitored and is considered in accident offsite dose calculations.

- Applicability for fuel storage pool area ventilation system gaseous and particulate process monitors is being changed from "with irradiated fuel in the storage pool or whenever there is fuel movement within the pool or crane operation with heavy loads over the storage pool." to "with recently irradiated fuel in the storage pool."

The licensee stated that the applicability for the fuel storage pool ventilation system gaseous and particulate process monitors needs to be revised to resolve inconsistencies that were inadvertently established with the implementation of Amendment 184. Amendment 184 revised the applicability of TS 3.9.12 (the fuel pool ventilation system LCO) to "Whenever recently irradiated fuel is in the spent fuel pool," but did not revise the applicability for the fuel storage pool ventilation system gaseous and particulate process monitors that support the fuel pool ventilation system. The proposed change will revise the "Applicable Modes" for the fuel storage pool area ventilation system gaseous and particulate process monitors to "With recently irradiated fuel in the storage pool." With the proposed change, the monitoring instrumentation will be required to be operable whenever the associated supported plant systems are required

to be operable. The staff concludes that the proposed change eliminates the inconsistency between the requirements of Table 3.3-6 and TS 3.9.12.

The staff also reviewed this proposed change with particular attention on continued compliance with 10 CFR 50.68, "Criticality accident requirements." It is the staff's understanding that monitors required to satisfy 10 CFR 50.68 are the fuel storage pool area monitors, which are listed separately in Table 3.3-6. The area monitors are required to be operable at all times when fuel is in the storage pool or building (as indicated by item 1.a. in table 3.3-6). The staff, therefore, finds the proposed change in applicability for items 2.b.i and 2.b.ii acceptable.

3.1.3 The following change is proposed for TSs Section 6, "Administrative Controls":

- The Ventilation Filter Testing Program is being added as Section 6.8.4.k.

The licensee stated that current TS SRs include details for the surveillance testing of the control room ventilation system filter trains, including testing frequency and filter performance requirements. The CE STSs simplify these SRs by referring to a VFTP. The Bases of the CE STSs state, "The VFTP includes testing of HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal. Specific test frequencies and additional information are discussed in detail in the VFTP."

The proposed change will move details associated with testing of control room ventilation system filters. This change is administrative in that there is no change being proposed that would alter the current scope of the ventilation system testing, the method of testing, or the established acceptance criteria. As discussed in 3.1.1, the staff finds this approach acceptable.

The licensee further stated that the St. Lucie VFTP will be documented as a program in Section 6 of the TSs and will be complemented by plant procedures. The plant procedures will be the primary implementing document for surveillance testing of the control room ventilation system's filters. Although the CE STSs captures ventilation filter testing for all TS-related ventilation systems within the VFTP, the proposed VFTP for the St. Lucie TSs only includes the control room emergency ventilation system. The licensee indicates that similar changes may be proposed in the future for other engineered safety feature ventilation systems.

In the June 24, 2004, RAI the staff asked why all current TSs requirements for control room ventilation filter testing were not included in the proposed description of the VFTP to be included in TS section 6. In its response, the licensee stated that all control room ventilation filter testing TSs requirements will be included in the VFTP. The proposed change is modeled after the NUREG-1432 format in that the filter train operational-type surveillance tests are explicitly stated in the LCO/Surveillance section and direction for the postmaintenance or preventive maintenance related surveillance tests are stated to be in accordance with the VFTP.

The proposed VFTP for control room emergency ventilation filter train testing lists all required TS surveillance acceptance criteria. The frequency requirements are met by describing the VFTP as a program that tests at the "frequencies specified in Regulatory Guide (RG) 1.52,

Revision 2." These testing frequencies specify off-normal as well as normal testing and match up with current TS testing frequencies.

The staff's RAI also questioned the licensee's conformance with the guidance of RG 1.52, Revision 2, regarding the in-place testing acceptance criteria of 0.05 percent for penetration and bypass. The current TS has an in-place testing acceptance criteria of 1 percent for penetration and bypass. The licensee responded that the current TS was based on an earlier version of RG 1.52. Nevertheless, a review of past surveillance test results indicated that the Unit 1 design can meet this lower limit. Consequently, at the NRC staff's request, the licensee adopted the in-place HEPA (DOP [dioctyl phthalate]) and charcoal (gas) testing criteria of less than or equal to 0.05 percent bypass leakage as recommended by RG 1.52, Rev. 2.

Based on the above discussion, the staff finds the proposed TSs for the VFTP acceptable.

3.1.4 The following typographical error corrections are proposed:

- In TS 3.4.1.4.1, an asterisk is being added to the LCO in reference to an existing footnote.

In its submittal, the licensee stated that TS 3.4.1.4.1 has a missing asterisk in the LCO that should be there to refer to an existing footnote. Staff review determined that the asterisk and associated footnote were added to the TSs by Amendment 103 and the asterisk was inadvertently removed by Amendment 179. The staff agrees that this is a typographical error and, therefore, finds the reinsertion of the asterisk acceptable.

- In TS 6.8.4.h.a, the Type B and C leakage rate acceptance criteria is being changed from $<6.0L_a$ to $<0.6L_a$.

The licensee also stated in its submittal that in TS 6.8.4.h.a, the acceptance criterion for the Type B and C leakage test is incorrectly stated as $<6.0L_a$. The correct value should be $<0.60L_a$. The error was introduced in license Amendment 149. The amendment request (FPL letter L-96-244) for the containment leakage rate testing program proposed the acceptance value to be $<0.60L_a$. However, when Amendment 149 was issued, the revised TSs page listed the acceptance value as $<6.0L_a$. The licensee noted that plant procedures contain the correct value of $<0.60L_a$. Staff review verified the accuracy of the licensee's evaluation and agreed that this is a typographical error. Therefore, the proposed change is acceptable.

3.2 Unit 2 Proposed Changes

3.2.1 The following changes are proposed for Technical Specification 3/4.7.7, "Control Room Emergency Air Cleanup System (CREACS)":

- For TS 3.7.7, the LCO applicability is changed from "ALL MODES" to "MODES 1, 2, 3, 4, 5 and 6 or during movement of irradiated fuel assemblies."

The LCO applicability currently includes All Modes, but the proposed change will expand the applicability to include "during movement of irradiated fuel assemblies." The licensee stated in

its submittal that this addition is considered appropriate because the FHA analysis assumes the operability of the CREACS. The FHA analysis of record was documented and approved as part of Amendment 127. The staff finds this requested change acceptable because it requires the CREACS to be operable (to mitigate a FHA) even if the reactor core is completely offloaded to the spent fuel pool.

- Mode 5 and 6 Actions are being modified to also apply "During movement of irradiated fuel assemblies."

The Unit 2 TSs currently include actions for Modes 5 and 6, however the TSs do not include actions applicable during movement of irradiated fuel. The TSs must require the system to be operable whenever irradiated fuel may be moved to ensure the validity of the FHA. Although the FHA evaluated recently irradiated fuel, the proposed change is more conservative because it requires CREACS to be operable during the movement of any irradiated fuel. The staff agrees that the proposed change is more conservative and, therefore, finds it acceptable.

- For Action "a" under Modes 5 and 6 or during the movement of irradiated fuel assemblies, add "or suspend movement of irradiated fuel assemblies" as an alternative action.

The staff finds this acceptable because it is consistent with the applicability modes and clearly provides reasonable assurance of safety by providing the safe alternative of stopping the movement of irradiated fuel assemblies.

- For Actions "b" and "c" under Modes 5 and 6 or during the movement of irradiated fuel assemblies, replace "suspend core alterations or positive reactivity changes" with "suspend movement of irradiated fuel assemblies."

The staff also finds this acceptable because it is consistent with the applicability modes and clearly provides reasonable assurance of safety by providing the safe alternative of stopping the movement of irradiated fuel assemblies.

- SR details associated with ventilation filter testing are being replaced with a reference to the VFTP.

Currently, SR 4.7.7 includes details for the surveillance testing of the CREACS filter trains, including testing frequency and filter performance requirements. The CE STSs simplify these SRs by referring to a VFTP. The Bases of the CE STSs state, "The VFTP includes testing of HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal. Specific test frequencies and additional information are discussed in detail in the VFTP." The proposed change will delete SRs associated with the filter testing of the CREACS. This change is administrative in that there is no change being proposed that would alter the current scope of the ventilation system testing, the method of testing, or the established acceptance criteria. The deleted SR details are captured in the newly created VFTP consistent with CE STSs. The staff concludes that the proposed change in presentation of these testing requirements is administrative, and, therefore, is acceptable.

- Proposed deletion of SR 4.7.7.a (verification control room air temperature less than or equal to120EF).

SR 4.7.7.a requires verification every 12 hours that control room air temperature is less than or equal to120EF. The licensee proposed deleting this SR on the basis that the surveillance does not appear in the CE STS. In a June 24, 2004, RAI, the staff asked the licensee to provide a plant-specific technical justification for the deletion. In its August 25, 2005, response to the RAI, the licensee stated that "upon further review of this specification (including identification of a similar surveillance in the CE STS) St. Lucie Plant withdraws the request to delete Surveillance requirements . . . 4.7.7.a (Unit 2) from St. Lucie Plant TS." Therefore, the current SR 4.7.7.a remains valid and the staff plans no further action on this request.

- Proposed revision to SR 4.7.7.e.3 to allow for conducting the control room pressure test on a staggered test basis.

In the June 24, 2004, RAI, the staff asked the licensee to provide a plant-specific technical justification for the deletion. In its August 25, 2005, response to the RAI, the licensee stated "in light of NRC Generic Letter 2003-01, "Control Room" and its uncertain future requirements, St. Lucie withdraws for now our request to change the control room pressurization surveillance interval to that as currently required by CE STS." Therefore, the current SR 4.7.7.e.3 remains valid and the staff plans no further action on this request.

3.2.2 The following changes are proposed for Table 3.3-6, "Radiation Monitoring Instrumentation":

- Applicability for the containment isolation monitor is being changed from Mode 6 to "During movement of recently irradiated fuel assemblies within containment."

The licensee stated that, as a result of the TSs change associated with Unit 2 amendment 127, the LCO applicability associated with the CIS radiation monitors requires revision. The applicability is currently identified as Mode 6; however, the noted action is to comply with the action of TS 3.9.9 (CIS), which was revised as a result of the noted amendment. Amendment 127 changed the applicability of TS 3.9.9 to "During the movement of recently irradiated fuel assemblies within containment." Therefore, as currently stated, the Mode 6 requirement for the CIS radiation monitor is inconsistent with the TS requirement for CIS operability. The proposed change would revise the CIS radiation monitor "Applicable Mode" to "During movement of recently irradiated fuel assemblies within containment." The staff concludes that the proposed change eliminates the inconsistency between the requirements of Table 3.3-6 and TS 3.9.9.

The staff also reviewed the proposed change with particular attention to the requirements of 10 CFR 20.1302. The proposed change is acceptable because it is the staff's understanding that the licensee addresses radioactive releases in its ODCM and that the potential release from a FHA will be monitored and is considered in accident dose offsite calculations.

- Applicability for the fuel storage pool area ventilation system gaseous and particulate monitors is being changed from “with irradiated fuel in the storage pool or whenever there is fuel movement within the pool or crane operation with loads over the storage pool” to “during movement of recently irradiated fuel assemblies or during crane operations with loads over recently irradiated fuel assemblies in the spent fuel storage pool.”

The licensee stated that the applicability for the fuel storage pool ventilation system gaseous and particulate process monitors needs to be revised to resolve inconsistencies that were inadvertently established with the implementation of Amendment 127. Amendment 127 revised the applicability of TS 3.6.6, “Shield Building Ventilation System (SBVS),” to require Mode 5 and 6 operability during movement of recently irradiated fuel assemblies or during crane operations with loads over recently irradiated fuel assemblies in the spent fuel storage pool. The SBVS provides the credited ventilation of the spent fuel pool area. However, Amendment 127 did not revise the applicability for the fuel storage pool ventilation system gaseous and particulate process monitors, which support the fuel pool ventilation system. The proposed change will revise the “Applicable Modes” for the fuel storage pool area ventilation system gaseous and particulate process monitors to “during movement of recently irradiated fuel assemblies or during crane operations with loads over recently irradiated fuel assemblies in the spent fuel storage pool.” With the proposed change, the monitoring instrumentation will be required to be operable whenever the associated supported plant systems are required to be operable. The staff concludes that the proposed change eliminates the inconsistency between the requirements of Table 3.3-6 and TS 3.6.6.

The staff also reviewed this proposed change with particular attention on continued compliance with 10 CFR 50.68, “Criticality accident requirements.” It is the staff’s understanding that monitors required to satisfy 10 CFR 50.68 are the fuel storage pool area monitors, which are listed separately in Table 3.3-6. The area monitors are required to be operable at all times when fuel is in the storage pool or building (as indicated by item 1.a. in table 3.3-6). The staff, therefore, finds the proposed change in applicability for items 2.a.i and 2.a.ii acceptable.

- Action Statement #24, which applies to the fuel storage pool area ventilation system gaseous and particulate monitors, is being changed to require the suspension of all operations during movement of recently irradiated fuel assemblies or during crane operations with loads over recently irradiated fuel assemblies in the spent fuel storage pool in place of the requirement to suspend all operations involving movement of fuel within the spent fuel storage pool and crane operations with loads over the spent fuel storage pool.

The staff finds this change acceptable because it is appropriate for Action Statement #24 to be consistent with the applicability of the fuel storage pool ventilation system gaseous and particulate process monitors.

3.2.3 The following change is proposed for TSs Section 6, “Administrative Controls”:

- The Ventilation Filter testing Program is being added as Section 6.8.4.k.

The licensee stated that current TS SRs include details for the surveillance testing of the CREACS filter trains, including testing frequency and filter performance requirements. The CE STSs simplify these SRs by referring to a VFTP. The Bases of the CE STSs state, "The VFTP includes testing of HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal. Specific test frequencies and additional information are discussed in detail in the VFTP."

The proposed change will move details associated with testing CREACS filters. This change is administrative in that there is no change being proposed that would alter the current scope of the ventilation system testing, the method of testing, or the established acceptance criteria. As previously discussed, the staff finds this approach acceptable.

The licensee further stated that the St. Lucie VFTP will be documented as a program in Section 6 of the TSs and will be implemented by plant procedures. The plant procedures will be the primary implementing document for surveillance testing of the control room ventilation system's filters. Although the CE STSs captures ventilation filter testing for all TS-related ventilation systems within the VFTP, the proposed VFTP for the St. Lucie TSs only includes the CREACS. The licensee indicates that similar changes may be proposed in the future for other engineered safety feature ventilation systems.

In the June 24, 2004, RAI the staff asked why all current TSs requirements for CREACS filter testing were not included in the proposed description of the VFTP to be included in TSs section 6. In its response, the licensee stated that all control room ventilation filter testing TSs requirements will be included in the VFTP. The proposed change is modeled after the NUREG-1432 format in that the filter train operational-type surveillance tests are explicitly stated in the LCO/Surveillance section and direction for the post maintenance or preventive maintenance related surveillance tests are stated to be in accordance with the VFTP.

The proposed VFTP for CREACS filter train testing lists all required TSs surveillance acceptance criteria. The frequency requirements are met by describing the VFTP as a program that tests at the "frequencies specified in Regulatory Guide (RG) 1.52, Revision 2." These testing frequencies specify off-normal as well as normal testing and match up with current TS testing frequencies.

Based on the above discussion, the staff finds the proposed TSs for the VFTP acceptable.

3.2.4 The following typographical error corrections are proposed:

- Item 2.1.1.2 (Peak Linear Heat Rate) is being deleted from Index page III.

The licensee stated that TSs section 2.1.1.2, "Peak Linear Heat Rate," and the associated index listing were deleted by Amendment 105. However, prior to issuance of Amendment 105, FPL submitted another amendment request that also affected Index page III. The page included with this later request, which included the listing for section 2.1.1.2, was subsequently issued with Amendment 117, thus unintentionally reinserting the listing for section 2.1.1.2. Staff review verified the accuracy of the licensee's evaluation and agreed that this is a typographical error. Therefore, the proposed change is acceptable.

- TS 3.9.8.2 LCO is being revised to change “The independent shutdown cooling loops shall be OPERABLE . . .” to “Two independent shutdown cooling loops shall be OPERABLE . . .”

The licensee stated that the word “Two” was inadvertently changed to “The” during the electronic TSs conversion process and was not identified during proofreading. The page with the typographical error was subsequently issued as part of Amendment 122. The staff verified that, prior to Amendment 122, the LCO stated “Two independent shutdown cooling loops . . . “ and was not intended to be changed by Amendment 122. The staff agrees that this is a typographical error and, therefore, finds the proposed change acceptable.

4.0 STATE CONSULTATION

Based upon a letter dated May 2, 2003, from Michael N. Stephens of the Florida Department of Health, Bureau of Radiation Control, to Brenda L. Mozafari, Senior Project Manager, U.S. Nuclear Regulatory Commission, the State of Florida does not desire notification of issuance of license amendments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (68 FR 61478, dated October 28, 2003). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

The Commission has concluded, 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.

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