



June 7, 2007

L-2007-097  
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 Amendment  
Request for Additional Information Response  
Containment Spray Nozzle Surveillance Change

By letter L-2006-078 dated October 19, 2006, Florida Power and Light Company (FPL) requested to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 to revise Technical Specification 4.6.2.1.d to change containment spray nozzle surveillance requirements from time-based to event-based frequencies.

The attachment to this letter provides the response to a verbal request for information that the Staff made with respect to the proposed license amendment. The no significant hazard analysis submitted with FPL letter L-2006-078 remains bounding. In accordance with 10 CFR 50.91(b)(1), a copy of the proposed amendment was forwarded to the State Designee for the State of Florida.

Please contact Ken Frehafer at 772-467-7748 if there are any questions about this submittal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 7<sup>th</sup> day of June 2007.

Very truly yours,

*Christopher R. Johnston for SVP 6.7.07*

Gordon L. Johnston  
Site Vice President  
St. Lucie Plant

GLJ/KWF

Attachment

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

NRC Question: The existing St. Lucie Technical Specification surveillance requirement for Containment Spray nozzles has a calendar based periodicity for performing an air or smoke flow test applicable to each containment spray nozzle. The intent of this Technical Specification provision has been that this verification would be performed for every nozzle of all trains and within the specified interval from the previous performance. The new wording requested is for requiring verification that each spray nozzle is unobstructed only following maintenance which could result in nozzle blockage.

Your evaluation of the change indicates that you have a Foreign Material Exclusion (FME) Program procedure that requires any loss of FME integrity to be identified in your plant Corrective Action Program (CAP). Your evaluation goes on to state that as a result of such a CAP entry for the Containment Spray System there would be an Engineering evaluation of the loss of FME integrity and a recovery plan that would determine the need to conduct a test or inspection to verify that the nozzles remain unobstructed.

1. Is the requested new wording for the surveillance requirement intended to be understood as requiring some sort of dynamic test (air or smoke flow) OR other alternative means such as internal visual inspection adequate to verify nozzles are unobstructed AND that it applies to only those nozzles identified in an engineering evaluation for post maintenance (including modification related work) testing as being potentially affected and needing such verification?

***FPL Response: Yes. The proposed surveillance requirement wording is intended to require nozzle testing or inspection when FME controls have been violated such that nozzle blockage is possible. Normal plant maintenance or modification activities are expected to be conducted in a manner that would avoid creating a potential nozzle blockage. Engineering evaluations are not necessary and, therefore, are not typically performed for these routine activities. Should FME controls be violated, a Condition Report would be initiated per the plant's CAP. If the foreign material is retrieved, then the potential threat to the nozzles is removed and Engineering would not likely be required to evaluate the condition; however, if the foreign material cannot be removed, then the FME Program will require Engineering to evaluate the condition. The Engineering evaluation would, by definition, consider the potential effects of the foreign material on system performance and the extent and method of the testing, including an alternative such as internal visual inspection if adequate, would be determined by that evaluation.***

2. Your evaluation did not indicate that there could be scheduled maintenance or modification work performed that might not have an associated CAP entry and thus not receive an engineering evaluation that would determine the need to conduct a test or inspection to verify that the containment spray nozzles remain unobstructed.
- a. Does your maintenance/modification process guidance prompt for consideration of nozzle testing for work on the Containment Spray System or other work that could affect the spray nozzles?

***FPL Response 2a: No, not specifically. Our maintenance/modification process requires that post maintenance and post modification testing is specified within appropriate guidance documents. Our administrative procedure for post maintenance testing provides guidance for standard maintenance activities and directs that the System Performance Group, an Engineering department, must specify appropriate post maintenance testing for all work involving ASME components. Containment Spray pumps, valves, and piping are in this category, but are not specifically addressed individually.***

***Our maintenance guidance documents do require that all activities involving opening of any piping system shall be governed by the FME program, requiring special precautions and closeout inspections to prevent the introduction of materials into the system that would be detrimental to its operation.***

- b. Would a CAP entry for an operational event not necessarily involving a loss of FME integrity such as inadvertent containment spray actuation also be expected to include a determination of the need to conduct a test or inspection to verify that the containment spray nozzles remain unobstructed?

***FPL Response 2b: Yes. Operational events are entered into the St. Lucie CAP and an event review team is assembled. If such an event were to involve the Containment Spray System, such as an inadvertent spray actuation, the team would collect and evaluate the available information on a case-by-case basis and recommend actions to take, which could include testing or inspection of spray system nozzles, should conditions warrant. Specific event evaluations would consider system interfaces, chemical interactions, the possibility of foreign material migration into the system, and impact of response actions on the spray system and nozzles.***