January 29, 2007

Mr. J. A. Stall
Senior Vice president, Nuclear and
Chief Nuclear Officer
Florida Power and Light Company
P.O. Box 1400
Juno Beach, Florida 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION – ST. LUCIE, UNIT 1 – TECHNICAL SPECIFICATION AMENDMENT FOR ALTERNATIVE SOURCE TERM (TAC NO. MD6173)

Dear Mr. Stall:

By letter dated July 16, 2007, Florida Power & Light Company (the licensee) submitted a request to amend the Operating License DPR-67 and Technical Specifications for St. Lucie, Unit 1 for Alternative Source Term as allowed by Title 10 of the *Code of Federal Regulations,* Section 50.67. We have reviewed the submittal and have determined that we need additional information before we can complete our review. Enclosed is our request for additional information.

This request was discussed with Mr. Ken Frehafer of your staff on January 14, 2008, and it was agreed that a response would be provided by February 14, 2008. If you have any questions, please feel free to contact me at 301-415-2020.

Sincerely,

/RA/

Brenda L. Mozafari, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-335

Enclosure: Request for Additional Information

cc: See next page

REQUEST FOR ADDITIONAL INFORMATION

ST. LUCIE UNIT 1

ALTERNATIVE SOURCE TERM AND CONFORMING AMENDMENT

TAC NO. MD6173

The license amendment request (LAR) proposes to amend Facility Operating License DPR-67 for St. Lucie Unit 1 to revise the licensing bases to adopt the Alternative Source Term as allowed by Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.67. To support Nuclear Regulatory Commission (NRC) assessment of the acceptability of the LAR in regard to the proposed changes, please provide the response to the following items:

1. Please provide the proposed setpoint that will be used for automatic initiation of the redundant control room isolation valves on outside air intake high radiation signal. Also provide the technical specification sheet where this setpoint is proposed to be included. Please respond to the following items with regard to the proposed setpoint:

   a. Setpoint Calculation Methodology: Provide documentation (including setpoint calculation) of the methodology used for establishing the limiting setpoint (or nominal set point) and the limiting acceptable values for the As-Found and As-Left setpoints as measured in periodic surveillance testing as described below. Indicate the related Analytical Limits and other limiting design values (and the sources of these values) for each setpoint.

   b. Safety Limit (SL)-Related Determination: Provide a statement as to whether or not the setpoint is a limiting safety system setting (LSSS) for a variable on which a SL has been placed as discussed in 10 CFR 50.36(c)(1)(ii)(A). Such setpoints are described as “SL-Related” in the discussions that follow. In accordance with 10 CFR 50.36(c)(1)(ii)(A), the following guidance is provided for identifying a list of functions to be included in the subset of LSSS specified for variables on which SLs have been placed as defined in Standard Technical Specification (TS) Sections 2.1.1, Reactor Core SLs and 2.1.2, Reactor Coolant System Pressure SLs. This subset includes automatic protective devices in TS for specified variables on which SLs have been placed that: (1) initiate a reactor trip; or (2) actuate safety systems. As such, these variables provide protection against violating reactor core safety limits, or reactor coolant system pressure boundary safety limits. Examples of instrument functions that might have LSSS included in this subset in accordance with the plant-specific licensing basis, are pressurizer pressure reactor trip (pressurized-water reactors), rod block monitor withdrawal blocks (boiling-water reactors), feedwater and main turbine high water level trip (boiling-water reactors), and end of cycle recirculation pump trip (boiling-water reactors). For each setpoint, or related group of setpoints, that you determined not to be SL-Related, explain the basis for this determination.

c. For Setpoint that is determined to be SL-Related: The NRC letter to the Nuclear Energy Institute SMTF dated September 7, 2005 (ADAMS Accession Number ML052500004), describes Setpoint-Related TS (SRTS) that are acceptable to the NRC for instrument settings associated with SL-Related setpoints. Specifically: Part "A" of the Enclosure to the letter provides LCO [limiting condition for operations] notes to be added to the TS, and Part "B" includes a check list of the information to be provided in the TS Bases related to the proposed TS changes.

(i) Describe whether and how you plan to implement the SRTS suggested in the September 7, 2005, letter. If you do not plan to adopt the suggested SRTS, then explain how you will ensure compliance with 10 CFR 50.36 by addressing items (ii) and (iii), below.

(ii) As-Found Setpoint Evaluation: Describe how surveillance test results and associated TS limits are used to establish operability of the safety system. Show that this evaluation is consistent with the assumptions and results of the setpoint calculation methodology. Discuss the plant corrective action processes (including plant procedures) for restoring channels to operable status when channels are determined to be "inoperable" or "operable but degraded." If the criteria for determining operability of the instrument being tested are located in a document other than the TS (e.g., plant test procedure), explain how the requirements of 10 CFR 50.36 are met.

(iii) As-Left Setpoint Control: Describe the controls employed to ensure that the instrument setpoint is, upon completion of surveillance testing, consistent with the assumptions of the associated analyses. If the controls are located in a document other than the TS (e.g., plant test procedure), explain how the requirements of 10 CFR 50.36 are met.

d. For Setpoint that is not determined to be SL-Related: Describe the measures to be taken to ensure that the associated instrument channel is capable of performing its specified safety functions in accordance with applicable design requirements and associated analyses. Include in your discussion information on the controls you employ to ensure that the As-Left trip setting after completion of periodic surveillance is consistent with your setpoint methodology. Also, discuss the plant corrective action processes (including plant procedures) for restoring channels to operable status when channels are determined to be "inoperable" or "operable but degraded." If the controls are located in a document other than the TS (e.g., plant test procedure), describe how it is ensured that the controls will be implemented.

2. Attachment 4 of the submittal provides the changes to the Bases section of the technical specifications. However, the Bases section has not been updated to include the bases for the addition of the new control room automatic isolation feature and the associated automatic actuation and manual times. The licensee is requested to update the Bases section to include the bases for the changes associated with the automatically actuated, redundant isolation valves.

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ST. LUCIE PLANT

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