

**ATTACHMENT 7
LICENSE AMENDMENT REQUEST
EXTENDED POWER UPRATE**

SUMMARY OF REGULATORY COMMITMENTS

**FLORIDA POWER AND LIGHT
ST. LUCIE NUCLEAR PLANT, UNIT 1**

This coversheet plus 2 pages

ATTACHMENT 7 SUMMARY OF REGULATORY COMMITMENTS

Introduction

The regulatory commitments listed below are intended to maintain compliance with regulatory requirements during preparation for and upon extended power uprate (EPU) implementation. The commitments are based upon the plant changes summarized in license amendment request (LAR) Attachment 5, EPU Licensing Report. These commitments will be completed prior to the final implementation of EPU.

REGULATORY COMMITMENTS

1. Update the Inservice Testing Program to reflect changes to plant pumps and valves under EPU conditions.
2. Provide operator training to account for increased EPU power level and resultant plant changes.
3. Implement modifications to provide radiation shielding for reactor auxiliary building heating, ventilation, and air conditioning (HVAC) components identified in LR Section 2.3.1, Environmental Qualification of Electrical Equipment.
4. Implement modification(s) to increase safety injection tank design pressure for EPU conditions described in LR Section 2.8.5.6.3, Emergency Core Cooling System and Loss-of-Coolant Accidents.
5. Implement modification(s) necessary to accommodate the simultaneous hot and cold leg injection requirements for EPU conditions as described in LR Section 2.8.5.6.3, Emergency Core Cooling System and Loss-of-Coolant Accidents.
6. Implement modification(s) to install a leading edge flow meter (LEFM) as described in LR Section 2.4.4, Measurement Uncertainty Recapture Power Uprate, and update UFSAR Section 13.8, Licensee-Controlled Technical Specification Requirements, to include Limiting Conditions for Operation (LCO) and Action Statements for the LEFM system.
7. Implement modification(s) to the ac electrical busses as described in LR Section 2.3.3, AC Onsite Power System.
8. Revise the administrative controls for the main containment purge isolation valves such that they are maintained closed in MODES 1, 2, 3 and 4.
9. Implement modification(s) to pipe supports for systems impacted by loads due to EPU conditions, as described in LR Section 2.2.2.2, Balance of Plant Piping, Components, and Supports.
10. Revise applicable procedures to accommodate operator actions during station blackout at EPU conditions, as described in LR Section 2.11, Human Factors.
11. Implement a MetamicTM insert surveillance program as described in LR Section 2.8.6.2, Spent Fuel Storage, and update the UFSAR to include the program requirements.

By letter R. Anderson, Florida Power and Light (FPL) to NRC Document Control Desk, Extended Power Uprate License Amendment Request – Response to NRC Acceptance Review Questions, dated July 30, 2010 (ML102160343), FPL provided a list of six regulatory commitments, which are listed below. These six commitments are either completed or will no longer be required as indicated below.

1. FPL commits to perform a new spent fuel pool criticality analysis to replace the existing analysis of record once the draft interim staff guidance (ISG) is formally issued. This revised analysis will be submitted as a separate license amendment request (LAR) for NRC review and approval. FPL will submit this LAR within one year of issuance of the final ISG.

This commitment is completed with the new spent fuel pool criticality analyses submitted via FPL letter L-2010-259.

2. Implement administrative controls to impose a 7% burnup penalty on the average burnup of any 2 X 2 array configuration allowed by current Technical Specifications. This burnup margin will offset the two issues identified by NRC and provides additional margin.

This commitment will no longer be required upon NRC approval and subsequent FPL implementation of the revised technical specifications associated with the EPU.

3. Implement administrative controls to maintain a spent fuel pool (SFP) boron concentration limit of ≥ 2000 ppm which is above the current Technical Specification limit of ≥ 1720 ppm.

This commitment will no longer be required upon NRC approval and subsequent FPL implementation of the revised technical specifications associated with the EPU.

4. Verify the normal position of valve V15322 (primary makeup water hose connection to the cask storage isolation) is locked closed as part of normal operator rounds in the fuel handling building.

This commitment will no longer be required upon NRC approval and subsequent FPL implementation of the revised technical specifications associated with the EPU.

5. Verify, as part of normal operator rounds in the fuel handling building, that there are not other sources or indications of dilution to the SFP.

This commitment will no longer be required upon NRC approval and subsequent FPL implementation of the revised technical specifications associated with the EPU.

6. Verify that the SFP boron concentration is ≥ 2000 ppm twice every seven days.

This commitment will no longer be required upon NRC approval and subsequent FPL implementation of the revised technical specifications associated with the EPU.