



January 27, 2014

L-2014-020
10 CFR 50.54(f)

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
Renewed Facility Operating License Nos. DPR-67 and NPF-16
Update to Response to NRC 10 CFR 50.54(f) Request for Information Regarding
Near-Term Task Force Recommendation 2.3, Flooding - Review of Available Physical Margin
(APM) Assessments

References:

- (1) NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012, Accession No. ML12073A348.
- (2) NRC Letter to Nuclear Energy Institute, "Endorsement of Nuclear Energy Institute (NEI) 12-07, 'Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features,'" dated May 31, 2012, Accession No. ML12144A142.
- (3) Florida Power & Light (FPL) Letter L-2012-428, dated November 27, 2012, "Response to NRC 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 2.3, Flooding, St. Lucie Plant Units 1 and 2, Flooding Walkdown Report FPL060-PR-001, Rev.0"
- (4) NRC Letter, "Request for Additional Information Associated with Near-Term Task Force Recommendation 2.3, Flooding Walkdowns," dated December 23, 2013, Accession No. ML13325A891
- (5) St. Lucie Corrective Action Program (CAP) Action Request (AR) 1748014, Assignment 04, Small APM Justification.
- (6) St. Lucie Corrective Action Program (CAP) Action Request (AR) 1931279, Assignment 01, Penetration Seal APM Justification.

On March 12, 2012, the NRC staff issued Reference 1 requesting information pursuant to Title 10 of the Code of Federal Regulations 50.54(f). Enclosure 4 of that letter contains specific Requested Information associated with Near-Term Task Force Recommendation 2.3 for Flooding. Per Reference 2, the NRC endorsed Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," dated May 31, 2012. By Reference 3, Florida Power & Light (FPL) submitted the final report in response to the request for information.

One of the requirements of NEI 12-07 is to identify the available physical margin (APM) associated with each applicable flood protection feature, determine if the margin provided is small, and evaluate any small margins that have potentially significant consequences through the corrective action process. The results of this effort were to be maintained on site for future NRC audits.

ADD
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Following the NRC staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow them to complete its assessments. Accordingly, by Reference 4 the NRC staff has issued a request for additional information (RAI). The attachment to this letter provides FPL's responses for the St. Lucie Plant.

This letter contains no new Regulatory Commitments and no revision to existing Regulatory Commitments.

Should you have any questions regarding this submittal, please contact Eric S. Katzman, St. Lucie Licensing Manager, at 772-467-7734.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on January 27, 2014

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jensen', with a long horizontal line extending to the right.

Joseph Jensen
Site Vice President
St. Lucie Plant

Attachment

Per (4) NRC Letter, "Request for Additional Information Associated with Near-Term Task Force Recommendation 2.3, Flooding Walkdowns," dated December 23, 2013, Accession No. ML13325A891, FPL provides the following responses.

RAI Number 1: Confirmation that the process for evaluating APM was reviewed.

Response: FPL has completed a review of the process used at the St. Lucie Plant to evaluate APMs.

RAI Number 2: Confirmation that the APM process is now or was always consistent with the guidance in NEI 12-07 and discussed in this RAI.

Response: The APM process used at St. Lucie Plant followed the guidance provided in NEI 12-07, including a definition for a small margin. Additional actions have been taken to make the process consistent with the information provided in this RAI.

RAI Number 3: If changes are necessary, a general description of any process changes to establish this consistency.

Response: As stated above, the APM process used at St. Lucie Plant followed the guidance provided in NEI 12-07, including a definition for a small margin (AR 1748014, Reference 5). However, a specific APM had not been assigned to the seals associated with flood protection features. These items have now been addressed in accordance with the guidance provided in this RAI and entered into the corrective action process (AR 1931279, Reference 6), as appropriate, for further evaluation.

RAI Number 4: As a result of the audits and subsequent interactions with industry during public meetings, NRC staff recognized that evaluation of APM for seals (e.g., flood doors, penetrations, flood gates, etc.) was challenging for some licensees. Generally, licensees were expected to use either Approach A or Approach B (described below) to determine the APM for seals:

- a) If seal pressure ratings were known, the seal ratings were used to determine APM (similar to example 2 in Section 3.13 of NEI 12-07). A numerical value for APM was documented. No further action was performed if the APM value was greater than the pre-established small-margin threshold value. If the APM value was small, an assessment of "significant consequences" was performed and the guidance in NEI 12-07 Section 5.8 was followed.*
- b) If the seal pressure rating was not known, the APM for seals in a flood barrier is assumed to be greater than the pre-established small-margin threshold value if the following conditions were met: (1) the APM for the barrier in which the seal is located is greater than the small-margin threshold value and there is evidence that the seals were designed/procured, installed, and controlled as flooding seals in accordance with the flooding licensing basis. Note that in order to determine that the seal has been controlled as a flooding seal, it was only necessary to determine that the seal configuration has been governed by the plant's design control process since installation. In this case, the APM for the seal could have been documented as "not small".*

As part of the RAI response, state if either Approach A or Approach B was used as part of the initial walkdowns or as part of actions taken in response to this RAI. No additional actions are necessary if either Approach A or B was used.

If neither Approach A or B was used to determine the APM values for seals (either as part of the walkdowns or as part of actions taken in response to this RAI), then perform the following two actions:

- Enter the condition into the CAP (note: it is acceptable to utilize a single CAP entry to capture this issue for multiple seals). CAP disposition of “undetermined” APM values for seals should consider the guidance provided in NEI 12-07, Section 5.8. The CAP disposition should confirm all seals can perform their intended safety function against floods up to the current licensing basis flood height. Disposition may occur as part of the Integrated Assessment. If an Integrated Assessment is not performed, determine whether there are significant consequences associated with exceeding the capacity of the seals and take interim action(s), if necessary, via the CAP processes. These actions do not need to be complete prior to the RAI response.*
- Report the APM as “undetermined” and provide the CAP reference in the RAI response.*

Response: Neither Approach A or B, as described above, were used to determine the APM values for seals. As part of the actions taken to address this RAI, the seals have been assigned an APM value of “undetermined” and have been entered into the CAP process (ARs 1748014 and 1931279, References 5 and 6) for further evaluation of their available physical margin. The disposition of the Action Requests will determine the APM and implementation of interim actions will be pursued, if necessary.

In addition, the original walkdown record forms issued as Attachment C to Reference 3 assigned an APM value of “N/A” for features (seals) located below the plant flood level. St. Lucie’s intent is to not revise Attachment C to reflect the change in APM value from “N/A” to “undetermined,” rather justification for the use of APM value “N/A” will be included as part of the CAP entry (Reference 6).