

NRR-PMDAPEm Resource

From: Saba, Farideh
Sent: Thursday, May 01, 2014 8:14 AM
To: eric.katzman@fpl.com; Lewis, Atanya (Atanya.Lewis@fpl.com)
Subject: RAIs regarding St Lucie Units TSTF-359 LAR
Attachments: St Lucie Units TSTF-359 RAIs April 29.docx

Importance: High

Eric,

Please see the attached NRC staff's RAIs for Technical Specifications changes regarding mode change limitations using the consolidated line item improvement process (TAC NOS. MF3618, MF3619). Please let me know if you have any questions. For the staff to be able to review this licensing action request, please respond by May 30, 2014.

Thanks,

Farideh

Farideh E. Saba, P.E.
Senior Project Manager
NRC/ADRO/NRR/DORL
301-415-1447
Mail Stop O-8G9A
Farideh.Saba@NRC.GOV

From: Schulten, Carl
Sent: Wednesday, April 30, 2014 8:30 AM
To: Saba, Farideh
Subject: FW: Request approval to issue the attached St Lucie Units TSTF-359 RAIs to Farideh. EOM.

The St. Lucie RAIs are attached.

From: Elliott, Robert
Sent: Tuesday, April 29, 2014 5:38 PM
To: Schulten, Carl
Subject: RE: Request approval to issue the attached St Lucie Units TSTF-359 RAIs to Farideh. EOM.

Approved...

From: Schulten, Carl
Sent: Tuesday, April 29, 2014 9:45 AM
To: Elliott, Robert
Subject: Request approval to issue the attached St Lucie Units TSTF-359 RAIs to Farideh. EOM.

Hearing Identifier: NRR_PMDA
Email Number: 1262

Mail Envelope Properties (Farideh.Saba@nrc.gov20140501081400)

Subject: RAIs regarding St Lucie Units TSTF-359 LAR
Sent Date: 5/1/2014 8:14:24 AM
Received Date: 5/1/2014 8:14:00 AM
From: Saba, Farideh

Created By: Farideh.Saba@nrc.gov

Recipients:

"eric.katzman@fpl.com" <eric.katzman@fpl.com>

Tracking Status: None

"Lewis, Atanya (Atanya.Lewis@fpl.com)" <Atanya.Lewis@fpl.com>

Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	1192	5/1/2014 8:14:00 AM
St Lucie Units TSTF-359 RAIs April 29.docx		26516

Options

Priority: High
Return Notification: No
Reply Requested: Yes
Sensitivity: Normal
Expiration Date:
Recipients Received: ZZZ

Request for Additional Information (RAI) Related to St. Lucie Units 1 & 2
Technical Specifications Changes Regarding Mode Change Limitations Using The Consolidated
Line Item Improvement Process (TAC NOS. MF3618, MF3619)

In its application (Agency Wide Document Access System Accession No: ML14077A265) dated February 26, 2014, Florida Power and Light (FPL) proposed to amend the St. Lucie Unit 1 and Unit 2 (St. Lucie) TS requirements for mode change limitations in LCO 3.0.4 and SR 4.0.4. The submittal stated that the changes are to be based on Nuclear Regulatory Commission (NRC) approved Industry /Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-359, Revision 9.

Regulatory Basis

The availability of TSTF-359 for adoption by licensees announced in the Federal Register on April 4, 2003 (68 FR 16579) included a model application that provides the expected level of detail and content for an application to revise technical specifications regarding mode change limitations and adoption of a technical specification bases control program.

RAI # 1 – This request consists of two parts. First, TSTF-359, Revision 9 inserts for LCO 3.0.4 includes the provision that “The specification [LCO 3.0.4] shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.” FPL did not include this language in the proposed St. Lucie LCO 3.0.4 despite the existence of a similar provision in current LCO 3.0.4: “This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION statements. Exceptions to these requirements are stated in individual specifications.”

Secondly, by letter dated September 21, 2011, the TSTF Transmitted TSTF-529, Revision 0, “Clarify Use and Application Rules.” By letter dated February 28, 2013 (ML13063A539), TSTF-529 was revised to reflect the discussions between the NRC and the TSTF at the October 16, 2012 public meeting to discuss the Traveler. TSTF-529, Revision 1 makes twelve changes. The pertinent change to TSTF-359 corrects the punctuation in LCO 3.0.4.b for the LCO 3.0.4 ordered list, 3.0.4.a, 3.0.4.b and 3.0.4.c, to ensure proper use and application of LCO 3.0.4. This punctuation change is preferred over the FPL proposed change and would be consistent with STS changes the staff is processing under TSTF-529.

The staff requests FPL revise the St. Lucie 1 & 2 mode change limitations LCO 3.0.4 to be consistent with TSTF-359, Revision 9 inserts, including the Bases, and with the proposed traveler TSTF-529, Revision 1 punctuation changes to LCO 3.0.4.b as shown in the markup below:

LCO 3.0.4

“When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated Actions to be entered permit continued operation in that MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk

management actions, if appropriate; (exceptions to this Specification are stated in the individual Specifications); or

c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.”

RAI #2 –The staff has determined that adopting standard TS LCO 3.0.4 as Specification 3.0.4 and standard TS SR 4.0.4 as Specification 4.0.4 in accordance with TSTF-359, Revision 9 without adopting standard TS SR 3.0.1 as Specification 4.0.1 would result in non-conservative implementation of technical specifications due to language incongruences between standard TS SR 3.0.1 and Specification 4.0.1. Therefore, to establish a consistent licensing basis that would ensure the allowances of TSTF-359, Revision 9 are correctly implemented the staff requests FPL revise St. Lucie Units 1 & 2 technical specifications SR 4.0.1 to be equivalent to standard TS SR 3.0.1.

Evaluation

Standard TS SR 3.0.1 requires Surveillance Requirements be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Standard TS SR 3.0.1 also includes the two following requirements:

Standard TS SR 3.0.1

Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3.

Thus, standard TS SR 3.0.1 specifies failure to meet a Surveillance or failure to perform a Surveillance is failure to meet the LCO. Whereas, Specification 4.0.1 (shown below) specifies failure to perform a Surveillance Requirement is failure to meet the LCO:

SR 4.0.1

Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. Surveillance Requirements do not have to be performed on inoperable equipment. [Emphasis added]

In accordance with TSTF-359, Revision 9 Specification 3.0.4 is revised to be implemented: “When an LCO *is not met*, [...] [Emphasis added]. Thus, Specification 3.0.4 would apply for noncompliance with a LCO which according to Specification 4.0.1 occurs upon failure to perform a Surveillance Requirement, but not explicitly for any other reason of noncompliance.

Specification 4.0.4 requires:

Entry into a MODE or other specified condition in the Applicability of a Limiting Condition for Operation (LCO) shall only be made when the LCO's Surveillances have been met within their specified frequency, except as provided by Surveillance Requirement 4.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

In accordance with TSTF-359, Revision 9 Specification 4.0.4 applies "When an LCO is not met due to Surveillances not having been met." Thus, Specification 4.0.4 would apply for noncompliance with a LCO which according to Specification 4.0.1 only occurs upon failure to perform a Surveillance Requirement, but not meet the Surveillance Requirement as the new Specification requires.

Therefore, to ensure the allowances of TSTF-359, Revision 9 are correctly implemented the staff requests FPL revise St. Lucie SR 4.0.1 to be equivalent to standard TS SR 3.0.1.

Contact: Carl Schulten, DSS/STSB