August 8, 2014

L-2014-205
10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Application for Technical Specification Change to Remove RCS Chemistry Requirements and Relocate to Licensee-Controlled Documents

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2. The proposed amendment would remove Technical Specification (TS) Limiting Condition for Operation (LCO) 3/4.4.7, "Chemistry," and relocate the requirements to the Updated Final Safety Analysis Report (UFSAR) for St. Lucie Unit 1 and the UFSAR for St. Lucie Unit 2. This proposed amendment is consistent with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants."

The Enclosure to this letter contains a description of the proposed change and includes a no significant hazards determination and environmental considerations.

Although this request is neither exigent nor emergency, your prompt review is requested. Once approved, the amendment shall be implemented within 60 days of its receipt by FPL. There are no new commitments made in this submittal.

This license amendment proposed by FPL has been reviewed by the St. Lucie Plant Onsite Review Group. In accordance with 10 CFR 50.91(b)(1), a copy of the proposed license amendment is being forwarded to the State Designee for the State of Florida.

Please contact Mr. Eric Katzman, Licensing Manager at 772-467-7734 if there are any questions about this submittal.

A001
NRR

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

Executed on August 8, 2014

Sincerely,

(ACTING)

Joseph Jensen
Site Vice President
St. Lucie Plant

Enclosure: License Amendment Request to Remove RCS Chemistry Requirements from the Technical Specifications and Relocate to Licensee-Controlled Documents

cc: Ms. Cynthia Becker, Florida Department of Health

Enclosure

Evaluation of the Proposed Change

Subject: License Amendment Request to Remove RCS Chemistry Requirements from the Technical Specifications and Relocate to Licensee-Controlled Documents

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1. St. Lucie Unit 1 Technical Specification Markups
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1.0 SUMMARY DESCRIPTION

Florida Power and Light Company (FPL) proposes to revise the St. Lucie Unit 1 and St. Lucie Unit 2 licensing basis by amending Appendix A of Renewed Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2. The proposed change will remove Technical Specification (TS) Limiting Condition for Operation (LCO) 3/4.4.7, "Chemistry," and relocate the requirements to the Updated Final Safety Analysis Report (UFSAR) for St. Lucie Unit 1 and the UFSAR for St. Lucie Unit 2. Changes to the UFSAR are controlled in accordance with 10 CFR 50.59. The change is consistent with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants."

Note that plant-specific TS relating to Reactor Coolant System (RCS) chemistry were not included in the original version of NUREG-1432 because this TS did not meet the TS inclusion requirements as identified in the NRC letter from T. E. Murley to W. S. Wilgus, dated May 9, 1988.

2.0 DETAILED DESCRIPTION

TS LCO 3/4.4.7, "Chemistry," provides limits on the oxygen, chloride, and fluoride content in the RCS to minimize corrosion. The proposed St. Lucie Unit 1 and St. Lucie Unit 2 License Amendment Request (LAR) will remove TS LCO 3/4.4.7, "Chemistry," and relocate the requirements to the Updated Final Safety Analysis Report (UFSAR) for St. Lucie Unit 1 and the UFSAR for St. Lucie Unit 2.

During relocation, current TS Actions may be modified. Such modification, if performed, will be controlled by the provisions of 10 CFR 50.59 to determine if prior NRC approval is required.

Note that the proposed removal results in several TS pages being deleted.

3.0 TECHNICAL EVALUATION

RCS corrosion is a slow process, which can be detected by in-service inspections or other means before significant degradation occurs. RCS chemistry is controlled to minimize corrosion over the long term. Although it is important to monitor and control RCS chemistry, limits and surveillance requirements do not meet the criteria of 10 CFR 50.36 for inclusion in the TS.

The NRC position on application of screening criteria to apply to TS LCO 3/4.4.7, "Chemistry," based on the Commission's Interim Policy Statement Criteria to Technical Specification Improvements is documented in a letter dated May 9, 1988 from T. E. Murley (NRC) to W. S. Wilgus (B&W Owners Group). The screening criteria were later incorporated into 10 CFR 50.36(c)(2)(ii), which contains the requirements for items that must be in the TS. An assessment of the current RCS chemistry TS requirements against the four criteria of 10 CFR 50.36(c)(2)(ii) is provided below.

(A) *Criterion 1.* Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

The RCS chemistry limits are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. Therefore, the RCS chemistry limits do not meet Criterion 1.

(B) *Criterion 2.* A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The RCS chemistry limits are not a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Therefore, the RCS chemistry limits do not meet Criterion 2.

(C) *Criterion 3.* A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The RCS chemistry limits are not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Therefore, the RCS chemistry limits do not meet Criterion 3.

(D) *Criterion 4.* A structure, system or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The RCS chemistry limits are not a structure, system or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Therefore, the RCS chemistry limits do not meet Criterion 4.

Since the 10 CFR 50.36(c)(2)(ii) criteria have not been met for inclusion in the TS as an LCO, the RCS chemistry LCO and associated Applicability, Actions, and Surveillance Requirement may be removed from the TS and relocated to the UFSAR. Following NRC approval of this proposed license amendment, changes to the relocated requirements will be controlled by the provisions of 10 CFR 50.59 to determine if prior NRC approval is required.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met.

There are no specific General Design Criteria associated with RCS chemistry. RCS sampling and chemistry limits are discussed in the UFSAR. Control of RCS chemistry is a function of the chemical and volume control system (CVCS). The chemistry and purity of the reactor coolant are controlled to ensure:

a) The plant is accessible for maintenance and operation without excessive radiation exposure to the operating personnel.
b) Long term operation of the plant is achieved without excessive fouling of heat transfer surfaces.
c) The corrosion rate of the materials in contact with the reactor coolant is kept at a minimum.

The proposed change does not eliminate monitoring and maintaining RCS chemistry; rather, it only acts to remove the requirements from the TS and relocate the requirements to the UFSAR.

In conclusion, FPL has determined that the proposed change does not require any exemptions or relief from regulatory requirements, other than the TS, and does not affect conformance with any regulatory requirement.

4.2 No Significant Hazards Consideration Determination

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazard if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

FPL is proposing that the Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 be amended to remove Technical Specification (TS) Limiting Condition for Operation (LCO) 3/4.4.7, "Chemistry," and relocate the requirements to the Updated Final Safety Analysis Report (UFSAR) for St. Lucie Unit 1 and the UFSAR for St. Lucie Unit 2. The proposed change is consistent with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants."

FPL has reviewed this proposed license amendment and determined that its adoption would not involve a significant hazards consideration.

The basis for this determination is as follows:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change acts to remove current Reactor Coolant System (RCS) chemistry limits and monitoring requirements from the TS and relocate the requirements to the UFSAR. Monitoring and maintaining RCS chemistry minimizes the potential for corrosion of RCS piping and components. Corrosion effects are considered a long-term impact on RCS structural integrity. Because RCS chemistry will continue to be monitored and controlled, relocating the current TS requirements to the UFSAR will not present an adverse impact to the RCS and subsequently, will not impact the probability or consequences of an accident previously evaluated. Furthermore, once relocated to the UFSAR, changes to RCS chemistry limits and monitoring requirements will be controlled in accordance with 10 CFR 50.59.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change acts to remove current Reactor Coolant System (RCS) chemistry limits and monitoring requirements from the TS and relocate the requirements to the UFSAR. The proposed change does not introduce new modes of plant operation and it does not involve physical modifications to the plant (no new or different type of equipment will be installed). There are no changes in the method by which any safety related plant structure, system, or component (SSC) performs its specified safety function. As such, the plant conditions for which the design basis accident analyses were performed remain valid.

No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures will be introduced as a result of the proposed change. There will be no adverse effect or challenges imposed on any SSC as a result of the proposed change.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is related to confidence in the ability of the fission product barriers to perform their accident mitigation functions. The proposed change acts to remove current

Reactor Coolant System (RCS) chemistry limits and monitoring requirements from the TS and relocate the requirements to the UFSAR. The proposed change will maintain limits on RCS chemistry parameters and will continue to provide associated monitoring requirements. The proposed change does not physically alter any SSC. There will be no effect on those SSCs necessary to assure the accomplishment of protection functions. There will be no impact on the overpower limit, departure from nucleate boiling ratio (DNBR) limits, loss of cooling accident peak cladding temperature (LOCA PCT), or any other margin of safety. The applicable radiological dose consequence acceptance criteria will continue to be met. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

4.3 Conclusions

Based on the above, FPL concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of no significant hazards consideration is justified.

5.0 ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment of an operating license for a facility requires no environmental assessment, if the operation of the facility in accordance with the proposed amendment does not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in a significant increase in individual or cumulative occupational radiation exposure. FPL has reviewed this license amendment request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination is as follows.

Basis

This change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in the 10 CFR 50.92 evaluation, the proposed amendment does not involve a significant hazards consideration.

2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed amendment does not change or modify the design or operation of any plant systems, structures, or components. The proposed amendment does not affect the amount

or types of gaseous, liquid, or solid waste generated onsite. The proposed amendment does not directly or indirectly affect effluent discharges.

3. The proposed amendment does not result in a significant increase in individual or cumulative occupational radiation exposure. The proposed amendment does not change or modify the design or operation of any plant systems, structures, or components. The proposed amendment does not directly or indirectly affect the radiological source terms.

6.0 PRECEDENT

This License Amendment Request is similar to a License Amendment Request approved by letter dated September 18, 2002 (ML022140131), "Hope Creek Generating Station - Issuance of Amendment Re: Relocation of Reactor Coolant System Chemistry Requirements (TAC No. MB4717)," and another License Amendment Request approved by letter dated July 23, 2008 (ML081400445), "Arkansas Nuclear One, Unit No. 2 – Issuance of Amendment Re: Technical Specification 3.4.7, 'Reactor Coolant System Chemistry' (TAC No. MD8313)."

7.0 REFERENCES

1. Letter from T. E. Murley (USNRC) to W. S. Wilgus (B&W Owners Group), dated May 9, 1988

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St. Lucie Unit 1
Technical Specifications Markups

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REACTOR COOLANT SYSTEM

CHEMISTRY

LIMITING CONDITION FOR OPERATION

3.4.7 The Reactor Coolant System chemistry shall be maintained within the limits specified in Table 3.4-1.

APPLICABILITY: ALL MODES.

ACTION:

MODES 1, 2, 3 and 4

a. With any one or more chemistry parameter in excess of its Steady State Limit but within its Transient Limit, restore the parameter to within its Steady State Limit within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With any one or more chemistry parameter in excess of its Transient Limit, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6

With the concentration of either chloride or fluoride in the Reactor Coolant System in excess of its Steady State Limit for more than 24 hours or in excess of its Transient Limit, reduce the pressurizer pressure to $\leq$ 500 psia, if applicable, and perform an analysis to determine the effects of the out-of-limit condition on the structural integrity of the Reactor Coolant System; determine that the Reactor Coolant System remains acceptable for continued operations prior to increasing the pressurizer pressure above 500 psia or prior to proceeding to MODE 4.

SURVEILLANCE REQUIREMENTS

4.4.7 The Reactor Coolant System chemistry shall be determined to be within the limits by analysis of those parameters at the frequencies specified in Table 4.4-3.

DELETED

TABLE 3.4-1

REACTOR COOLANT SYSTEM

CHEMISTRY LIMITS

PARAMETER	STEADY STATE LIMIT	TRANSIENT LIMIT
DISSOLVED OXYGEN	≤ 0.10 ppm*	≤ 1.00 ppm*
CHLORIDE	≤ 0.15 ppm	≤ 1.50 ppm
FLUORIDE	≤ 0.10 ppm	≤ 1.00 ppm

* Limit not applicable with $T_{avg} \leq 250°F$

TABLE 4.4-3

REACTOR COOLANT SYSTEM

CHEMISTRY LIMITS SURVEILLANCE REQUIREMENTS

PARAMETER	MINIMUM SAMPLING FREQUENCIES	MAXIMUM TIME BETWEEN SAMPLES
DISSOLVED OXYGEN	3 times per 7 days*	72 hours
CHLORIDE	3 times per 7 days	72 hours
FLUORIDE	3 times per 7 days	72 hours

* Not required with $T_{avg} \leq 250°F$

DELETED

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REACTOR COOLANT SYSTEM

3/4.4.7 CHEMISTRY

LIMITING CONDITION FOR OPERATION

3.4.7 The Reactor Coolant System chemistry shall be maintained within the limits specified in Table 3.4-2.

APPLICABILITY: ALL MODES

ACTION:

MODES 1, 2, 3 and 4:

a. With any one or more chemistry parameter in excess of its Steady State Limit but within its Transient Limit, restore the parameter to within its Steady State Limit within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With any one or more chemistry parameter in excess of its Transient Limit, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6:

With the concentration of either chloride or fluoride in the Reactor Coolant System in excess of its Steady State Limit for more than 24 hours or in excess of its Transient Limit, reduce the pressurizer pressure to less than or equal to 500 psia, if applicable, and perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the Reactor Coolant System; determine that the Reactor Coolant System remains acceptable for continued operation prior to increasing the pressurizer pressure above 500 psia or prior to proceeding to MODE 4.

SURVEILLANCE REQUIREMENTS

4.4.7 The Reactor Coolant System chemistry shall be determined to be within the limits by analysis of those parameters at the frequencies specified in Table 4.4-3.

DELETED

TABLE 3.4-2

REACTOR COOLANT SYSTEM

CHEMISTRY

PARAMETER	STEADY STATE LIMIT	TRANSIENT LIMIT
DISSOLVED OXYGEN*	≤ 0.10 ppm	≤ 1.00 ppm
CHLORIDE	≤ 0.15 ppm	≤ 1.50 ppm
FLUORIDE	≤ 0.15 ppm	≤ 1.50 ppm

* Limit not applicable with T_{avg} less than or equal to 250°F.

DELETED

TABLE 4.4-3

REACTOR COOLANT SYSTEM

CHEMISTRY LIMITS SURVEILLANCE REQUIREMENTS

PARAMETER	MINIMUM SAMPLING FREQUENCIES	MAXIMUM TIME BETWEEN SAMPLES
DISSOLVED OXYGEN	3 times per 7 days*	72 hours
CHLORIDE	3 times per 7 days	72 hours
FLUORIDE	3 times per 7 days	72 hours

* Not required with T_{avg} less then or equal to 250°F

DELETED

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DELETED

DELETED

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