

## **NRR-PMDA-ECapture Resource**

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**From:** Saba, Farideh  
**Sent:** Thursday, December 18, 2014 4:59 PM  
**To:** Lewis, Atanya (Atanya.Lewis@fpl.com)  
**Cc:** ken.frehafer@fpl.com; eric.katzman@fpl.com; Shaikh, Samina  
**Subject:** REQUEST FOR ADDITIONAL INFORMATION - LAR FOR A PERMANENT EXTENSION TO THE CONTAINMENT TYPE A LEAK RATE TESTING LICENSE AMENDMENT REQUEST FOR A PERMANENT EXTENSION TO THE CONTAINMENT TYPE A LEAK RATE TESTING (MF4694 AND MF4695)

**Importance:** High

Atanya,

By application dated August 26, 2014 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML14241A496) (Reference 1), Florida Power & Light Company (FPL, the licensee) requested changes to the Technical Specifications (TSs) for St. Lucie Unit 1 and Unit 2. The proposed change would permit the existing Containment Integrated Leak Rate Testing (ILRT) frequency to be extended from 10 years to 15 years on a permanent basis.

The Nuclear Regulatory Commission staff has reviewed the License Amendment Request (LAR) and requests the following additional information to complete its review. As we agreed during the clarification conference call today (12/18/2014), please respond by January 30, 2014.

### SCVB RAI-1

10 CFR 50 Appendix J, Option B Implementation item #3 states that:

The regulatory guide or other implementation document used by a licensee or applicant for an operating license under this part or a combined license under part 52 of this chapter to develop a performance-based leakage-testing program must be included, by general reference, in the plant technical specifications.

In addition, in the August 20, 2013 letter from NRC to Nuclear Energy Institute (NEI) (ADAMS Accession no. ML13192A394) (Reference 2), the staff indicated that:

Due to the omission of the limitations and conditions from NEI 94-01, Revision 2 SE into NEI 94-01, Revision 3-A, the NRC will not be able to reference NEI 94-01, Revision 3-A in the update to RG 1.163. Any licensee submissions referencing the TR [Technical Report] will require requests for additional information from the NRC to address the limitations and conditions from the NRC SE for NEI 94-01, Revision 2.

In the enclosure to the submittal dated August 26, 2014, Section 2.0, "Detailed Description," changes to the proposed TS 6.8.4.h for Units 1 and 2, included a reference to Nuclear Energy Institute, NEI 94-01, Revision 3-A. However, the conditions and limitations contained in NEI 94-01, Revision 2-A, were not incorporated in NEI 94-01, Revision 3-A.

Explain how the 10 CFR 50 Appendix J, Option B Implementation item #3 and NRC concerns stated in the August 20, 2013 letter from NRC to NEI will be addressed.

### REFERENCES

1. Florida Power & Light Company letter to NRC dated August 26, 2014 “St Lucie Nuclear Plant Docket Nos. 50-335 and 50-389 LAR Application for TSs Change to Permanently Extend the ILRT Frequency to 15 Years” (ADAMS Accession Number ML14241A496).
2. NRC letter to Biff Bradley (Director, Nuclear Energy Institute), dated August 20, 2013, “REQUEST REVISION TO TOPICAL REPORT NEI 94-01, REVISION 3-A, “Industry Guideline for Implementing Performance-Based Option of 10 CFR PART 50, Appendix J”, (ADAMS Accession Number ML13192A394).

Thanks,

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