January 13, 2015

L-2015-013
10 CFR 50.90

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555-0001

Re: St. Lucie Units 1 and 2
Dockets Nos. 50-335 and 50-389
Response to Request for Additional Information Regarding License Amendment Request to Implement Technical Specifications Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specifications Task Force (RITSTF) Initiative 5B"

References:

1. FPL letter L-2014-015 dated February 20, 2014: St. Lucie Plant - Application for Technical Specification (TS) Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (ADAMS Accession No. ML14070A087)

2. NRC letter dated December 19, 2014: Request for Additional Information - TSTF 425 LAR - TACs MF3495/96 (ADAMS Accession No. ML14355A000)

Per Reference 1 above, Florida Power & Light Company (FPL) requested an amendment to the Renewed Facility Operating Licenses for St. Lucie Unit 1 and Unit 2. The license amendment request (LAR) would modify the St. Lucie Units 1 and 2 Technical Specifications by relocating specific surveillance frequencies to a licensee-controlled program with implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5b, Risk Informed Method for Control of Surveillance Frequencies" (ADAMS Accession No. ML071360456).

By letter dated December 19, 2014 (Reference 2), NRC staff requested additional information regarding the LAR. The enclosure to this letter provides a detailed response to a request for additional information (RAI) from the Technical Specifications Branch (STSB).

The information provided in this submittal does not impact the 10 CFR 50.92 evaluation of "No Significant Hazards Consideration" previously provided in FPL letter L-2014-015. This submittal makes no new commitments or changes to existing commitments.

Should you have any questions regarding this submittal, please contact Mr. Eric Katzman, Licensing Manager, at (772) 467-7734.

A047
NRR

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

Executed on January 13, 2015.

Respectfully submitted,

Joseph Jensen
Site Vice President
St. Lucie Nuclear Plant

Enclosure: 1. St. Lucie Units 1 and 2 TSTF-425 LAR RAI Response

cc: USNRC Regional Administrator, Region II
USNRC Senior Resident Inspector, St. Lucie Units 1 and 2
USNRC Project Manager, St. Lucie Units 1 and 2
Ms. Cindy Becker, Florida Department of Health

Enclosure 1
St. Lucie Units 1 and 2 TSTF-425 LAR RAI Response

Response to Request for Additional Information Regarding License Amendment Request for Transition to Implement Technical Specifications Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specifications Task Force (RITSTF) Initiative 5B"

STSB RAI 3

STSB RAI 3

The NRC staff's model safety evaluation for TSTF-425 states that all surveillance frequencies can be relocated *except* for frequencies that reference other approved programs for the specific interval (such as the Inservice Testing Program or the code-related program). For the following surveillance requirement (SR), the licensee proposed to apply the SFCP to components subject to the inservice inspection (ISI) program.

- St. Lucie Unit 1 [and Unit 2] TS SR 4.8.1.1.2.g.2, regarding the operability of the emergency diesel generators, currently states:

Each diesel generators shall be demonstrated OPERABLE [...] At least once per 10 years by [...] Performing a pressure test of those portions of the diesel fuel oil system designed to USAS B31.7 Class 3 requirements [or for Unit 2, "designed to Section III, subsection ND of the ASME Code"] in accordance with the *Inservice Inspection Program* [emphasis added].

Please confirm whether the ISI program specifies a frequency for this surveillance requirement. If it does, please revise the application to remove the proposed change to this SR. Please confirm whether the licensee's application included proposed changes to SRs that reference other approved programs that are not in accordance with the NRC's model safety evaluation of TSTF-425, and revise the application to remove such proposed changes.

RESPONSE

The ISI program does not establish the frequency for SR 4.8.1.1.2.g.2; rather, the reference to it concerns pressure test methodology. On April 3, 2002 Amendments 181 and 124 were issued for Unit 1 and Unit 2 Technical Specifications (TSs), respectively, approving a request to remove the prescriptive testing requirements previously stated in the SR. [ML021210717] Specifically, the then existing requirement to perform the pressure test "at a test pressure equal to 110% of the system design pressure in accordance with the Inservice Inspection Program" was modified to delete "at a test pressure equal to 110% of the system design pressure":

Unit 1 SR 4.8.1.1.2.g.2

g. At least once per 10 years by:
   2. Performing a pressure test of those portions of the diesel fuel oil system designed to USAS B31.7 Class 3 requirements ~~at a test pressure equal to 110% of the system design pressure~~ in accordance with the Inservice Inspection Program.

Unit 2 SR 4.8.1.1.2.g.2

g. At least once per 10 years by:
   2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code ~~at a test pressure equal to 110% of the system design pressure~~ in accordance with the Inservice Inspection Program.

The purpose of this change was to allow the Class 3 portions of the diesel fuel oil systems to be pressured tested using the methodology endorsed in ASME Code Case N-498-4. Since the ISI program implements ASME Code (and other similar) requirements, the reference to it was appropriately retained. The reference to the ISI program is in regards to testing methodology only. The frequency is dictated by the TSs and is reflected in ISI program procedures.

The ISI program plan states that "...Inservice System Pressure Testing of ASME Code Class 1, Class 2, and Class 3 components and systems is addressed by St. Lucie Plant procedures." Implementing procedures 1-ISP-100.01 and 2-ISP-100.01, "ASME Section XI Pressure Test Procedure for Class 2 & 3 Systems," note that the diesel fuel oil piping leakage test is "required every 10 years per TS 4.8.1.1.2.g.2."

With respect to there being additional instances of proposed changes to SRs that reference other approved programs, there are none; however, there are SRs that refer to a "program," which may be misconstrued as meaning an approved program. The approved programs for St. Lucie are described in Section 6.0, "Administrative Controls," of the St. Lucie TSs. These particular SRs do not refer to a program that is described in Section 6.0. To remove any ambiguity, these SRs will be addressed in a license amendment request supplement that FPL expects to submit in January 2015.