



May 19, 2015

L-2015-154
10 CFR 50.90

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

St. Lucie Nuclear Plant, Units 1 and 2
Docket Nos. 50-335 and 50-389

Re: Administrative Changes to Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

References:

1. Florida Power & Light Company letter L-2014-015, "Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," February 20, 2014 (ML 14070A087)
2. NRC E-mail "Request for Additional Information - TSTF 425 LAR - TACs MF3495/96," November 17, 2014 (ML 14322A925)
3. Florida Power & Light Company letter L-2014-370, "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,' " December 11, 2014 (ML 14349A333)
4. NRC E-mail "Request for Additional Information - TSTF 425 - TACs MF3495/96," December 19, 2014 (ML 14355A000)
5. Florida Power & Light Company letter L-2015-013, "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,' " January 13, 2015 (ML 15029A497)
6. Florida Power & Light Company letter L-2015-001, "Supplement to Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," January 28, 2015
7. Florida Power & Light Company letter L-2015-080, "Administrative Changes to Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," dated April 18, 2015 (ML15119A219)

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In Reference 1 and supplemented by References 3 and 4, Florida Power & Light Company (FPL) submitted a request for an amendment to the Technical Specifications (TS) for St. Lucie Units 1 and 2. The proposed amendment would modify the TS 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." The changes are consistent with U.S. Nuclear Regulatory Commission (NRC)-approved TS Task Force Standard TS change TSTF-425, "Relocate Surveillance Frequencies to Licensee Control- RITSTF [Risk-Informed TS Task Force] Initiative 5b," Revision 3.

A review of the TS markups included in References 1, 3, 4, 6 and 7 identified the need for editorial changes to some of the TS markups. The changes, which are administrative in nature, are necessary to correct typographical errors. Attachment 1 discusses the editorial changes, and Attachments 2 and 3 provide revised markups of the TS pages. The markups included in the attachments supersede the corresponding TS markups provided in References 1, 3, 4, 6 and 7.

The corrections to the TS markups do not alter the conclusion in Reference 1 that the proposed changes do not involve a significant hazards consideration.

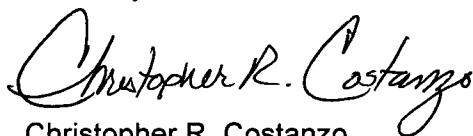
This letter contains no new regulatory commitments and does not modify any existing commitments.

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

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

Executed on May 19, 2015

Sincerely,



Christopher R. Costanzo
Site Vice President
St. Lucie Nuclear Plant

Attachments (3)

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

ATTACHMENT 1

Description of Editorial Changes to the Markups of the Technical Specifications

Changes to the TS Markups for St. Lucie Unit 1

1. The markup of TS Table 4.3-2., TS page 3/4 3-18 contains an editorial error. In the table on page 3/4 4-19, the markup contained a typo that failed to strikethrough the "M" and replace with "SFCP" in functional area 4.c. This is editorial in that the main steam line isolation (MSIS) automatic actuation logic is within scope of the TSFT-425. Attachment 2 provides a corrected markup of Table 4.3-2, which adds the strikethrough for the channel functional test for functional unit 4.c.
2. The TS markup for TS page 3/4 7-4 inadvertently deleted the trailing "by:" for 4.7.1.2.a. Attachment 2 provides the corrected TS markup.

Changes to the TS Markups for St. Lucie Unit 2

1. The TS markups for Tables 4.3-1 and 4.3-2 contain typos in that the "SFCP" change contained a typo as "SCFP". Attachment 3 provides the corrected TS markups for the applicable TS tables.

ATTACHMENT 2

St. Lucie Unit 1

Markups of the Technical Specifications

3/4 3-18

3/4 7-4

Replace each marked up surveillance frequency with "SFCP".

TABLE 4.3-2
ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
1. SAFETY INJECTION (SIAS)				
a. Manual (Trip Buttons)	N.A.	N.A.	R	N.A.
b. Containment Pressure – High	S	R	M	1, 2, 3
c. Pressurizer Pressure – Low	S	R	M	1, 2, 3
d. Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3
2. CONTAINMENT SPRAY (CSAS)				
a. Manual (Trip Buttons)	N.A.	N.A.	R	N.A.
b. Containment Pressure – High-High	S	R	M	1, 2, 3
c. Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3
3. CONTAINMENT ISOLATION (CIS)				
a. Manual (Trip Buttons)	N.A.	N.A.	R	N.A.
b. Containment Pressure – High	S	R	M	1, 2, 3
c. Containment Radlaton – High	S	R	M	1, 2, 3, 4
d. Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3
e. SIAS	N.A.	N.A.	R	N.A.
4. MAIN STEAM LINE ISOLATION (MSIS)				
a. Manual (Trip Buttons)	N.A.	N.A.	R	N.A.
b. Steam Generator Pressure – Low	S	R	M	1, 2, 3
c. Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3
5. CONTAINMENT SUMP RECIRCULATION (RAS)				
a. Manual RAS (Trip Buttons)	N.A.	N.A.	R	N.A.
b. Refueling Water Storage Tank – Low	S	R	M	1, 2, 3
d. Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3

⤴ C

X

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two motor driven feedwater pumps, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

With one auxiliary feedwater pump inoperable, restore at least three auxiliary feedwater pumps (two motor driven pumps and one capable of being powered by an OPERABLE steam supply system) to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. ~~At least once per 31 days by:~~

Insert 1

STET



ATTACHMENT 3

St. Lucie Unit 2

Markups of the Technical Specifications

~~3/4 3-8~~

3/4 3-9

3/4 3-22

Replace each marked up surveillance frequency with "SGFP"

SFCP

TABLE 4.3-1

REACTOR PROTECTIVE INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
1. Manual Reactor Trip	N/A	N.A.	S/U(1)	1, 2, 3*, 4*, 5*
2. Variable Power Level – High				
a. Nuclear Power	S	Q(2), M(3), Q(4)	M	1, 2
b. ΔT Power	S	Q(5), Q(4)		1
3. Pressurizer Pressure – High	S	R	M	1, 2
4. Thermal Margin/Low Pressure	S	R	M	1, 2
5. Containment Pressure – High	S	R	M	1, 2
6. Steam Generator Pressure – Low	S	R	M	1, 2
7. Steam Generator Pressure Difference – High	S	R	M	1, 2
8. Steam Generator Level – Low	S	R	M(8, 9)	1, 2
9. Local Power Density – High	S	R	M	1
10. Loss of Component Cooling Water to Reactor Coolant Pumps	N.A.	N.A.	M	N.A.
11. Reactor Protection System Logic	N.A.	N.A.	M(7)	1, 2, 3*, 4*, 5*

*

Replace each marked up surveillance frequency with "SCFP"

SCFP

TABLE 4.3-1 (Continued)

REACTOR PROTECTIVE INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u>
12. Reactor Trip Breakers	N.A.	N.A.	S/U(1), M, R(6)	1, 2, 3*, 4*, 5*
13. Wide Range Logarithmic Neutron Flux Monitor	S	R	S/U(1), R	1, 2, 3, 4, 5
14. Reactor Coolant Flow - Low	S	R	M	1, 2
15. Loss of Load (Turbine Hydraulic Fluid Pressure - Low)	S	N.A.	M	1

X

Replace each marked up surveillance frequency with "SCFP" → SCFP

TABLE 4.3-2

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED	
1. SAFETY INJECTION (SIAS)					
a. Manual (Trip Buttons)	N.A.	N.A.	R	1, 2, 3, 4	
b. Containment Pressure – High	S	R	M	1, 2, 3	
c. Pressurizer Pressure – Low	S	R	M	1, 2, 3	
d. Automatic Actuation Logic	N.A.	N.A.	M(1), R(3)	1, 2, 3, 4	X
2. CONTAINMENT SPRAY (CSAS)					
a. Manual (Trip Buttons)	N.A.	N.A.	R	1, 2, 3, 4	
b. Containment Pressure – High-High	S	R	M	1, 2, 3	
c. Automatic Actuation Logic	N.A.	N.A.	M(1), R(3)	1, 2, 3, 4	X
3. CONTAINMENT ISOLATION (CIAS)					
a. Manual CIAS (Trip Buttons)	N.A.	N.A.	R	1, 2, 3, 4	
b. Safety Injection SIAS	N.A.	N.A.	R	1, 2, 3, 4	
c. Containment Pressure – High	S	R	M	1, 2, 3	
d. Containment Radiation – High	S	R	M	1, 2, 3	
e. Automatic Actuation Logic	N.A.	N.A.	M(1), R(3)	1, 2, 3, 4	X
4. MAIN STEAM LINE ISOLATION					
a. Manual (Trip Buttons)	N.A.	N.A.	R	1, 2, 3	
b. Steam Generator Pressure – Low	S	R	M	1, 2, 3	
c. Containment Pressure – High	S	R	M	1, 2, 3	
d. Automatic Actuation Logic	N.A.	N.A.	M(1), R(3)	1, 2, 3, 4	X
5. CONTAINMENT SUMP RECIRCULATION (RAS)					
a. Manual RAS (Trip Buttons)	N.A.	N.A.	R	N.A.	
b. Refueling Water Storage Tank – Low	S	R	M	1, 2, 3	
d. Automatic Actuation Logic	N.A.	N.A.	M(1), R(3)	1, 2, 3	X

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