

**Record of Review**  
**Dispositions to St. Lucie Internal Events and Fire PRA Facts and Observations (F&Os)**

FINDING/SUGGESTION (F&O) ID OR SUPPORTING REQUIREMENT (SR)	INTERNAL EVENTS PRA F&O ACCEPTABLE TO STAFF VIA		
	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
AS-1	A		
AS-2	A		
AS-3	A		
AS-4	A		
AS-6		See PRA RAI 17.a. Acceptable to the NRC staff because the licensee clarified no credit is considered for low pressure feed from the condensate pumps in scenarios associated with a recoverable Loss of Main Feedwater event given that doing so would neither alter nor significant change risk insights. The licensee further adds that the FPRA does not credit use of condensate pumps and/or main feedwater pumps for secondary heat removal given the potential for loss of these systems due to the unavailability of associated non-safety-related support systems.	
AS-8	A		
TH-2	A		
AS-11	A		
AS-12	B		
AS-13	B		
AS-14	A		
DE-1	A		
DA-A1	A		
DA-C13	A		
DA-C14	A		
DA-D4	A		
HR-D1	A		
HR-G6			See PRA RAI 17.b.
HR-I2	A		
HR-I3	A		
IE-1	A/C		
IE-4	C		
IE-5	A		
IE-7	A		
IE-8	A		
IFEV-A1	C		
IFEV-A7	C		
IFEV-B3	C		
IFPP-B1	C		
IFPP-B3	C		
IFQU-A1	C		
IFQU-A5	C		

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		Not Discussed in SE	Discussed in SE
IFQU-A6	C		
IFQU-A10	C		
IFQU-B2	C		
IFQU-B3	C		
IFSN-A5	C		
IFSN-A6	C		
IFSN-A7	C		
IFSO-A3	C		
IFSO-A4-1	C		
IFSO-A4-2	C		
IFSO-A5-1	C		
IFSO-A5-2	C		
IFSO-A6	C		
IFSO-B2	C		
IFSO-B3	C		
QU-2	A		
QU-4	A		
SY-1	A		
SY-8	B		
SY-12	B		
SY-14	A		
SY-15	A		
ST-1	A		
ST-2			See PRA RAI 16.
SL-CCF-02	C		
SL-CCF-06	A		
SL-CCF-10	B		
SL-CCF-12	A		
MU-2	A		
IE-C5-01	C		Note that the licensee's disposition to this F&O was provided in response to PRA RAI 16.
IE-C6-01	C		Note that the licensee's disposition to this F&O was provided in response to PRA RAI 16.
IE-C9-01	C		Note that the licensee's disposition to this F&O was provided in response to PRA RAI 16.
SY-A2-01	C		Note that the licensee's disposition to this F&O was provided in response to PRA RAI 16.

A: For F&Os, the NRC staff finds that the disposition of the F&O as described by the licensee in the LAR provides confidence that the issues raised by the F&O have been addressed and, if needed, the PRA has been modified, and therefore the resolution of the F&O is acceptable for this application. For Not Met or met at CC-I SRs, the NRC staff finds that the acceptability basis for the capability category of the SR as described by the licensee in the LAR provides confidence that the requirements of the SR

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have been addressed and, if needed, the PRA has been modified, and therefore the PRA quality with respect to the SR is acceptable for this application. Examples of acceptable Not Met and CC-I SRs are modeling methods that yield conservative FRE and change evaluation results.

- B: For F&Os, the NRC staff finds that the disposition of the F&O as described by the licensee in the LAR and further clarified during the audit provides confidence that the issues raised by the F&O have been addressed and, if needed, the PRA has been modified, and therefore the resolution of the F&O is acceptable for this application. For Not Met or met at CC-I SRs, the NRC staff finds that the acceptability basis for the capability category of the SR as described by the licensee in the LAR and further clarified during the audit provides confidence that requirements of the SR have been addressed and, if needed, the PRA has been modified, and therefore the PRA quality with respect to the SR is acceptable for this application. Examples of acceptable Not Met and CC-I SRs are modeling methods that yield conservative FRE and change evaluation results.
- C: For F&Os, the NRC staff finds that the resolution of the F&O, as described by the licensee in the LAR, would have a negligible effect on the evaluations relied upon to support fire risk evaluations and has no impact on the conclusions of the risk assessment and therefore the resolution of the F&O is acceptable for this application. Examples of such F&Os may be suggestions, as well as those F&Os that don't affect the FPRA. Documentation issues may fall into this category as well. For Not Met or met at CC-I SRs, the NRC staff finds that the acceptability basis for the capability category of the SR, as described by the licensee in the LAR, would have a negligible effect on the evaluations relied upon to support fire risk evaluations and has no impact on the conclusions of the risk assessment and therefore the PRA quality with respect to the SR is acceptable for this application. Examples are those SRs that don't affect the FPRA.

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	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
PP-A1-01		See PRA RAI 01.a. Acceptable to the NRC staff because the licensee stated that walkdowns were performed of the "no man's land" area between PSL Units 1 and 2 and confirmed that that no equipment or raceways impacting the FPRA exist in the area.	
PP-B7-01			See PRA RAI 01.c.
PP-C2-01		See PRA RAI 01.b. Acceptable to the NRC staff because the licensee stated that a walkdown was performed to determine if any fire sources outside of the fire zones evaluated by the FPRA could pose a threat to the evaluated zones and confirmed that no external fire sources exist that can pose a threat to the evaluated fire zones.	
PP-C3-01			See PRA RAI 01.c.
ES-C1-01			See PRA RAIs 01.d and 01.d.01.
ES-C2-01			See PRA RAIs 01.e, 01.d and 01.d.01.
ES-D1-01	B		
CS-A3-01	B		
CS-A6-01	B		
CS-A11-01		See PRA RAI 01.f. Acceptable to the NRC staff because the licensee stated that no exclusions of cable from fire impacts were credited unless supported by traced, detailed and complete, cable routings. The licensee further clarified that no assumed cable routing is applied to the FPRA and that all exclusions are based on circuit analysis applicable to both the SSD analysis and the FPRA.	
CS-B1-01	B		
CS-C1-01	B		
CS-C2-01	B		
PRM-C1-01	B		
FSS-A1-01			See PRA RAI 01.g and 01.g.01.
FSS-A1-02		See PRA RAI 01.n. Acceptable to	

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	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
		the NRC staff because the licensee stated that automatic suppression was only credited in the HGL analysis and MCA to prevent HGL. The licensee confirmed that suppression actuation will occur prior to formation of a HGL, that is, because smoke detectors are used or the actuation temperatures of other detection devices (e.g., thermal detectors) are well below the temperatures at which HGLs are assumed to occur. The licensee further clarified that a review of plant unavailability/unreliability data was performed and no outlier behavior was identified.	
FSS-A4-01	B		
FSS-A6-01			See PRA RAIs 11, 11.c.01, 11.c.02.
FSS-D9-01		See PRA RAI 01.k. Acceptable to the NRC staff because the licensee evaluated the effect of smoke for each of the failure modes discussed in Appendix T to NUREG/CR-6850 to demonstrate either that fire scenario treatments in FPRA are bounding or that the failure mode of concern has minimal or no risk significance.	
FSS-E4-01		See PRA RAI 01.f. Acceptable to the NRC staff because the licensee stated that no exclusions of cable from fire impacts were credited unless supported by traced, detailed and complete, cable routings. The licensee further clarified that no assumed cable routing is applied to the FPRA and that all exclusions are based on circuit analysis applicable to both the SSD analysis and the FPRA.	
FSS-G1-01			See PRA RAI 20.
FSS-H1-01			See PRA RAIs 01.m, 01.m.01, 01.m.01.01, 01.p, 04 and 04.01 as well as FM RAIs 01.n and 02.e.
FSS-H2-01	B		
FSS-H8-01			See PRA RAIs 01.m, 01.m.01 and 01.m.01.01.
IGN-A5-01	A		

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	Review of Plant Disposition (A/B/C)	RAI Response	
		Not Discussed in SE	Discussed in SE
CF-B1-01	B		
HRA-A2-01			See PRA RAIs 01.h, 01.l, and 01.o.
HRA-A4-01	B		
HRA-B3-01			See PRA RAIs 01.h, 01.l, and 01.o.
HRA-B3-02			See PRA RAIs 01.l and 01.o.
HRA-B3-03			See PRA RAIs 01.l and 01.o.
HRA-C1-01			See PRA RAIs 01.l and 01.o.
SF-A1-01	C		
FQ-C1-01			PRA RAIs 01.i, 01.l, 01.o, and 17.b.01.
FQ-E1-01	B		
FQ-F1-01	B		
UNC-A1-01	B		
UNC-A1-03			See PRA RAI 01.j.

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