July 14, 2015

L-2015-170
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 the 10 Year Sediment Cleaning of the Fuel Oil Storage Tank and Relocate to Licensee-Controlled Documents

Pursuant to 10 CFR 50.90, Florida Power & 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) Surveillance Requirement (SR) 4.8.1.1.2.g 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 outage related nor required by any specific date, 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 or changes to existing 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 July 14, 2015

Sincerely,

Christopher R. Costanzo

Christopher R. Costanzo
Site Vice President
St. Lucie Plant

Enclosure: License Amendment Request to Remove the 10 Year Sediment Cleaning of the Fuel Oil Storage Tank 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 the 10 Year Sediment Cleaning of the Fuel Oil Storage Tank from the Technical Specifications and Relocate to Licensee-Controlled Documents

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ATTACHMENTS:

1. St. Lucie Unit 1 Technical Specification Markup
2. St. Lucie Unit 2 Technical Specification Markup
3. St. Lucie Unit 1 Retyped Technical Specification Page
4. St. Lucie Unit 2 Retyped Technical Specification Page

1.0 SUMMARY DESCRIPTION

Florida Power & 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) Surveillance Requirement (SR) 4.8.1.1.2.g 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."

2.0 DETAILED DESCRIPTION

Unit 1 TS SR 4.8.1.1.2.g states,

g. At least once per ten years by:

1. Draining each fuel storage tank, removing the accumulated sediment and cleaning the tank using an appropriate cleaning compound, and

2. Performing a pressure test of those portions of the diesel fuel oil system designed to USAS B31.7 Class 3 requirements in accordance with the Inservice Inspection Program.

Unit 2 TS SR 4.8.1.1.2.g states,

g. At least once per ten years by:

1. Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution, and

2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code in accordance with the Inservice Inspection Program.

The St. Lucie Unit 1 and St. Lucie Unit 2 License Amendment Request (LAR) proposes to remove TS SR 4.8.1.1.2.g and relocate the requirements to the UFSAR for St. Lucie Unit 1 and the UFSAR for St. Lucie Unit 2.

During relocation, current TS requirements 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.

3.0 TECHNICAL EVALUATION

The requirements related to the content of the TS are set forth in 10 CFR 50.36, which requires the TS to include items in five specific categories, including: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCO); (3) surveillance requirements; (4) design features; and (5) administrative controls. The regulation specifies criteria for certain requirements, but does not specify the particular requirements to be included in a plant's TS. As a result, existing TS requirements that fall within or satisfy any of the criteria in 10 CFR 50.36 must be retained in the TS while those TS requirements that do not fall within or satisfy these criteria may be relocated to other licensee controlled documents.

According to 10 CFR 50.36(c)(2)(ii), a LCO must be included in TS for any item meeting one or more of the criteria 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.

(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.

(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.

(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.

In addition, 10 CFR 50.36(c)(3) states that SRs to be included in the TS are those relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCO will be met.

TS SR 4.8.1.1.2.g is a maintenance activity and is not a necessary surveillance to demonstrate operability of the diesel generators, and thus does not meet the criteria in 10 CFR 50.36 for retention in the TS. Operability of a diesel generator and its associated fuel oil system are ensured by other TS SRs, which remain unchanged. Fuel oil will continue to be maintained within the acceptable quantity and quality limits with the relocation of TS SR 4.8.1.1.2.g. The performance of TS SR 4.8.1.1.2.c and the limits of the Diesel Fuel Oil Testing Program, TS 6.8.4.n, help ensure tank sediment is minimized. The performance of TS SR 4.8.1.1.2.a once per 31 days ensures that any degradation of the tank wall surface that results in a fuel oil volume reduction is detected and corrected in a timely manner. As a result, adequate controls exist to relocate TS SR 4.8.1.1.2.g to licensee-controlled documents consistent with TSTF-2 as approved by the NRC in Reference 7.1.

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.

Updated Final Safety Analysis Report (UFSAR) Section 3.1.17 for both St. Lucie Unit 1 and Unit 2 discusses conformance with General Design Criterion (GDC) 17, "Electrical Power Systems," and requires that an onsite electrical power system and an offsite electrical power system shall be provided to permit functioning of structures, systems, and components important to safety and that the safety function of each system shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents. GDC 17 also states the onsite electrical power sources shall have sufficient independence, redundancy, and testability to perform their safety functions assuming a single failure. No changes are proposed regarding St. Lucie Unit 1 and Unit 2 conformance to GDC 17.

TS SR 4.8.1.1.2.g requirements will be deleted from the TS and relocated to Chapter 13 of the St. Lucie Unit 1 and Unit 2 UFSARs. Any changes to relocated requirements will be controlled by the provisions of 10 CFR 50.59 to determine if prior NRC approval is required.

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) Surveillance Requirement (SR) 4.8.1.1.2.g 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." The SR was removed from the Improved Standard Technical Specifications under Technical Specification Task Force (TSTF) Traveler No. 2 (TSTF-2), "Relocate the 10 Year Sediment Cleaning of the Fuel Oil Storage Tank to Licensee Control," approved by the NRC on July 16, 1998.

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 TS SR 4.8.1.1.2.g requirements from the TS and relocate the requirements to the UFSAR. The fuel storage tanks provide an adequate volume of diesel generator fuel oil for diesel generators to operate in the event of a loss of coolant accident and concurrent loss of offsite power. Relocating TS SR 4.8.1.1.2.g requirements from the TS to the UFSAR will not present an adverse impact to the fuel storage tanks and subsequently, will not impact the probability or consequences of an accident previously evaluated. Furthermore, once relocated to the UFSAR, changes to fuel storage tank sediment cleaning requirements will be controlled in accordance with 10 CFR 50.59. Diesel generator fuel oil quantity and quality are assured by other TS SRs that remain unchanged.

   The proposed change does not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, and configuration or the manner in which the plant is operated and maintained. The proposed change does not adversely affect the ability of any structure, system, or component (SSC) to perform its intended safety function to mitigate the consequences of an initiating event within the assumed acceptance limits.

   The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of any accident previously evaluated. Further, the proposed change does not increase the types and amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures.

   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 TS SR 4.8.1.1.2.g 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 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 TS SR 4.8.1.1.2.g requirements from the TS and relocate the requirements to the UFSAR. The TS SRs retained in TS will continue to ensure the proper functioning of diesel generators. 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 Conclusion

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

The proposed change is consistent with the Improved Standard Technical Specifications (ISTS), NUREGs-1430 through 1434. The ISTS were revised to remove the fuel oil storage tank sediment cleaning requirement by TSTF-2 as approved by the NRC in Reference 7.1. This License Amendment Request is similar to a License Amendment Request approved by letter dated June 2, 2008 (ML081230493), "River Bend Station, Unit 1 - Issuance of Amendment Re: Adoption of Technical Specification Task Force (TSTF)-2, Relocate the 10-year Sediment Cleaning of the Fuel Oil Storage Tank to Licensee Control (TAC No. MD7380)," (Reference 7.2) and another License

Amendment Request approved by letter dated April 2, 2009 (ML090710868), "Clinton Power Station, Unit No. 1 – Issuance of Amendment Re: License Amendment Request to Adopt TSTF-2, 'Relocate the 10-year Sediment Cleaning of the Fuel Oil Storage Tank to Licensee Control' (TAC No. MD9589)," (Reference 7.3).

7.0 REFERENCES

1. Letter from W. D. Beckner (USNRC) to J. Davis (Nuclear Energy Institute), dated July 16, 1998
2. Letter from J. N. Donohew (USNRC) to Vice President, Operations (Entergy Operations, Inc.), "River Bend Station, Unit 1 - Issuance of Amendment Re: Adoption of Technical Specification Task Force (TSTF)-2, Relocate the 10-year Sediment Cleaning of the Fuel Oil Storage Tank to Licensee Control (TAC No. MD7380)," dated June 2, 2008 (ML081230493)
3. Letter from S. P. Sands (USNRC) to C. G. Pardee (Exelon Generation Company), "Clinton Power Station, Unit No. 1 – Issuance of Amendment Re: License Amendment Request to Adopt TSTF-2, 'Relocate the 10-year Sediment Cleaning of the Fuel Oil Storage Tank to Licensee Control' (TAC No. MD9589)," dated April 2, 2009 (ML090710868)

ATTACHMENT 1

St. Lucie Unit 1
Technical Specifications Markup

This coversheet plus 1 page

TS page 3/4 8-6b

LICENSE AMENDMENT REQUEST
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS
TO REMOVE THE 10 YEAR SEDIMENT CLEANING OF THE FUEL OIL STORAGE
TANK AND RELOCATE TO LICENSEE-CONTROLLED DOCUMENTS

SURVEILLANCE REQUIREMENTS (continued)

~~g. At least once per ten years by:~~

~~1. Draining each fuel storage tank, removing the accumulated sediment and cleaning the tank using an appropriate cleaning compound, and~~

~~2. Performing a pressure test of those portions of the diesel fuel oil system designed to USAS B31.7 Class 3 requirements in accordance with the Inservice Inspection Program.~~

4.8.1.1.3 Reports – (Not Used)

4.8.1.1.4 The Class 1E underground cable system shall be demonstrated OPERABLE within 30 days after the movement of any loads in excess of 80% of the ground surface design basis load over the cable ducts by pulling a mandrel with a diameter of at least 80% of the duct's inside diameter through a duct exposed to the maximum loading (duct nearest the ground's surface) and verifying that the duct has not been damaged.

ATTACHMENT 2

St. Lucie Unit 2
Technical Specifications Markup

This coversheet plus 1 page

TS page 3/4 8-7a

LICENSE AMENDMENT REQUEST
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS
TO REMOVE THE 10 YEAR SEDIMENT CLEANING OF THE FUEL OIL STORAGE
TANK AND RELOCATE TO LICENSEE-CONTROLLED DOCUMENTS

SURVEILLANCE REQUIREMENTS (Continued)

12. Verifying that the automatic load sequence timers are operable with the interval between each load block within ±1 second of its design interval.

13. Performing Surveillance Requirement 4.8.1.1.2a.4 within 5 minutes of shutting down the diesel generator after it has operated within a load band of 3450 kW to 3685 kW# for at least 2 hours or until operating temperatures have stabilized.

f. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting**** the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to approximately 900 rpm in less than or equal to 10 seconds.

~~g. At least once per 10 years by:~~

~~1. Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution, and~~

~~2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code in accordance with the Inservice Inspection Program.~~

4.8.1.1.3 Reports – (Not Used).

4.8.1.1.4 The Class 1E underground cable system shall be demonstrated OPERABLE within 30 days after the movement of any loads in excess of 80% of the ground surface design basis load over the cable ducts by pulling a mandrel with a diameter of at least 80% of the duct's inside diameter through a duct exposed to the maximum loading (duct nearest the ground's surface) and verifying that the duct has not been damaged.

This band is meant as guidance to avoid routine overloading of the engine. Variations in load in excess of this band due to changing bus loads shall not invalidate this test.

**** This test may be conducted in accordance with the manufacturer's recommendations concerning engine prelube period.

ATTACHMENT 3

St. Lucie Unit 1
Retyped Technical Specifications Page

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TS page 3/4 8-6b

LICENSE AMENDMENT REQUEST
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS
TO REMOVE THE 10 YEAR SEDIMENT CLEANING OF THE FUEL OIL STORAGE
TANK AND RELOCATE TO LICENSEE-CONTROLLED DOCUMENTS

SURVEILLANCE REQUIREMENTS (continued)

4.8.1.1.3 Reports – (Not Used)

4.8.1.1.4 The Class 1E underground cable system shall be demonstrated OPERABLE within 30 days after the movement of any loads in excess of 80% of the ground surface design basis load over the cable ducts by pulling a mandrel with a diameter of at least 80% of the duct's inside diameter through a duct exposed to the maximum loading (duct nearest the ground's surface) and verifying that the duct has not been damaged.

ATTACHMENT 4

St. Lucie Unit 2
Retyped Technical Specifications Page

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TS page 3/4 8-7a

LICENSE AMENDMENT REQUEST
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS
TO REMOVE THE 10 YEAR SEDIMENT CLEANING OF THE FUEL OIL STORAGE
TANK AND RELOCATE TO LICENSEE-CONTROLLED DOCUMENTS

SURVEILLANCE REQUIREMENTS (Continued)

12. Verifying that the automatic load sequence timers are operable with the interval between each load block within ±1 second of its design interval.

13. Performing Surveillance Requirement 4.8.1.1.2a.4 within 5 minutes of shutting down the diesel generator after it has operated within a load band of 3450 kW to 3685 kW# for at least 2 hours or until operating temperatures have stabilized.

f. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting**** the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to approximately 900 rpm in less than or equal to 10 seconds.

4.8.1.1.3 Reports – (Not Used).

4.8.1.1.4 The Class 1E underground cable system shall be demonstrated OPERABLE within 30 days after the movement of any loads in excess of 80% of the ground surface design basis load over the cable ducts by pulling a mandrel with a diameter of at least 80% of the duct's inside diameter through a duct exposed to the maximum loading (duct nearest the ground's surface) and verifying that the duct has not been damaged.

This band is meant as guidance to avoid routine overloading of the engine. Variations in load in excess of this band due to changing bus loads shall not invalidate this test.

**** This test may be conducted in accordance with the manufacturer's recommendations concerning engine prelube period.