



**FPL**

October 23, 2015

L-2015-270  
10 CFR 50.90

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

Subject: St. Lucie Unit 1  
Docket No. 50-335  
RAI Reply Fourth Ten-Year Inservice Inspection Interval License  
Amendment Request Changes to Snubber Surveillance Requirements

References:

1. L-2015-164 dated July 15, 2015, "Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements," Accession Number ML15198A029
2. NRC Letter dated August 27, 2015, "St. Lucie Plant, Unit No. 1 - Request for Additional Information on License Amendment Request for Changes to the Snubber Surveillance Requirements (Tac No. MF6490)," Accession Number ML15237A413

Via Reference 1 Florida Power & Light Company (FPL) submitted a proposed amendment would revise the St. Lucie Unit 1 Technical Specification (TS) surveillance requirements (SRs) for snubbers to conform to revisions to the Snubber Testing Program.

In Reference 2, the NRC identified administrative issues with some of the marked up and word processed TSs provided in Reference 1. The attachment to this letter contains revised TS to address these concerns. These TS changes are bounded by the original no significant hazards evaluation. FPL acknowledges that this RAI reply was sent in late and this was discussed with the PM. If you should have any questions, please contact Mr. Ken Frehafer at (772) 467-7748.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 2015.

Sincerely,

Christopher R. Costanzo  
Site Vice President  
St. Lucie Plant

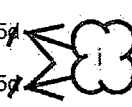
cc: USNRC Regional Administrator, Region II  
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant  
Ms. Cindy Becker, Florida Department of Health

Attachment  
Florida Power & Light Company

AD47  
NRR

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**ADMINISTRATIVE CONTROLS (continued)**

o. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.



**6.9 REPORTING REQUIREMENTS**

**ROUTINE REPORTS**

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC.

**STARTUP REPORT**

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following:

- (1) receipt of an operating license,
- (2) amendment of the license involving a planned increase in power level,
- (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and
- (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

Insert:

p. Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

1. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
2. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(b) subject to the conditions listed in 10 CFR 50.55a(b) and subject to Commission approval.
3. The program shall, as required by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants".
4. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.

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**ADMINISTRATIVE CONTROLS (continued)**

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