



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 16, 2015

Mr. Mano Nazar  
President and Chief Nuclear Officer  
Nuclear Division  
NextEra Energy  
P.O. Box 14000  
Juno Beach, FL 33408-0420

SUBJECT: ST. LUCIE PLANT, UNIT NO. 1 - REQUEST FOR ADDITIONAL INFORMATION  
REGARDING LICENSE AMENDMENT REQUEST FOR CHANGES TO THE  
SNUBBER SURVEILLANCE REQUIREMENTS (CAC NO. MF6490)

Dear Mr. Nazar:

By letter dated July 15, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A029), as supplemented by letter dated October 23, 2015 (ADAMS Accession No. ML15303A255), Florida Power & Light Company (FPL or the licensee) requested changes to the technical specifications (TSs) for the St. Lucie Plant, Unit No. 1. The proposed amendment would revise TS surveillance requirements for the snubbers to conform to revisions to the snubber testing program.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the information provided by the licensee and has determined it needs additional information to complete review of the subject license amendment request. The request for additional information (RAI) is enclosed.

A draft of these questions was sent to Mr. Ken Frehafer of your staff on December 2, 2015 (ADAMS Accession No. ML15336A841), with an opportunity to have a teleconference to ensure that FPL understood the questions and their regulatory basis, as well as to verify that the information was not previously docketed.

By e-mail dated December 8, 2015 (ADAMS Accession No. ML15342A107), Mr. Frehafer stated that a conference call was not necessary, and the NRC staff agreed that FPL would respond to the RAI no later than January 29, 2016. Please note that if you do not respond to the RAI by the agreed upon date, the NRC staff may reject your request for relief under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108, "Denial of application for failure to supply information."

M. Nazar

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If you have any questions, please contact me at (301) 415-1447 or [Farideh.Saba@nrc.gov](mailto:Farideh.Saba@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Farideh E. Saba". The signature is fluid and cursive, with a small mark at the end that could be a date or initials.

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-335

Enclosure:  
Request for Additional Information

cc w/enclosure: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION  
REGARDING LICENSE AMENDMENT REQUEST FOR CHANGES TO  
THE SNUBBER SURVEILLANCE REQUIREMENTS  
FLORIDA POWER & LIGHT COMPANY  
ST. LUCIE PLANT, UNIT NO. 1  
DOCKET NO. 50-335

1.0 SCOPE

By letter dated July 15, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A029), as supplemented by letter dated October 23, 2015 (ADAMS Accession No. ML15303A255), Florida Power & Light Company (FPL or the licensee) requested changes to the technical specifications (TSs) for the St. Lucie Plant, Unit No. 1 (SLP-1). The proposed amendment would revise TS surveillance requirements (SRs) for the snubbers to conform to revisions to the snubber testing program.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review.

2.0 REQUEST FOR ADDITIONAL INFORMATION (RAI)

**RAI 1**

Attachment 1 to the letter dated July 15, 2015, "Description and Assessment," Section 2.0, "Detailed Description," page 1, states that the SLP-1 fourth 10-year inservice inspection (ISI) interval began February 11, 2008, and will continue until February 10, 2018.

Currently, as described in TS 3/4.7.10 and the FPL fourth 10-year ISI program submittal letter L-2008-043, dated March 13, 2008 (ADAMS Accession No. ML080810193), snubber testing and examination are performed in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(b)(3)(v), which allows the use of Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants," of the American Society of Mechanical Engineers Operation and Maintenance Code (ASME OM Code), the 2001 Edition through 2003 Addenda.

As allowed by 10 CFR 50.55a(g)(4)(iv), FPL is proposing the use of Subsection ISTD of the ASME OM Code, the 2004 Edition with 2005 and 2006 Addenda, for the remainder of the SLP-1, fourth 10-year ISI interval, subject to Commission approval.

Enclosure

Section 1.6.1.20 of the letter, dated March 13, 2008, states:

St. Lucie 1 will utilize the option in 10CFR50.55a(b)(3)(v) to implement Subsection ISTD, "Inservice Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Power Plants," ASME OM Code, 2001 Edition through the 2003 Addenda in place of the requirements for snubbers in Section XI, IWF-5200(a) and (b) and IWF-5300(a) and (b).

- (a) Please explain whether any relief request was submitted to the NRC to use TS 3/4.7.10 requirements in lieu of the ASME OM Code requirements, or if any license amendment request was submitted to the NRC to ensure that TSs are consistent with Subsection ISTD of the ASME OM Code, 2001 Edition with 2003 Addenda, in accordance with 10 CFR 50.55a(g)(4).
- (b) Please verify that currently, VT-3 method is being used for snubber visual examination while using the ASME OM Code, Subsection ISTD, 2001 Edition through 2003 Addenda, as required by 10 CFR 50.55a(b)(3)(v).
- (c) Please provide the dates when SLP-1 will start using the snubber program based on the ASME OM Code, 2004 Edition through 2005 and 2006 Addenda, as discussed in Attachment 5 to the letter dated July 15, 2015.

## **RAI 2**

By *Federal Register* notice 79 FR 65776, dated November 5, 2014, which became effective on December 5, 2014, the paragraph headings in 10 CFR 50.55a were revised. Accordingly, 10 CFR 50.55a(a)(3) is now covered under the equivalent 10 CFR 50.55a(z). Therefore, please change the following:

- (a) In letter dated July 15, 2015, Attachment 1, page 1 of 5, Section 3.0, "Technical Evaluation," first paragraph, the referenced regulation 10 CFR 50.55a(a)(3) should be changed to 10 CFR 50.55a(z).
- (b) In letter dated July 15, 2015, Attachment 1, page 2 of 5, Section 3.0, "Technical Evaluation," second paragraph, sixth line, the referenced 10 CFR 50.55a(3) should be changed to 10 CFR 50.55a(z).

## **RAI 3**

In the letter dated July 15, 2015, Attachment 1, Section 3.0, "Technical Evaluation," the second paragraph states:

As noted in Regulatory Issue Summary 2010-06, licensees have the option to control the ASME Code-required ISI and testing of snubbers through their TS or other licensee-controlled documents. For plants using their TS to govern ISI and testing of snubbers, 10 CFR 50.55a(g)(5)(ii) requires that if a revised ISI program for a facility conflicts with the TS, the licensee shall apply to the Commission for amendment of the TS to conform the TS to the revised program. Therefore, when proposing program alternatives in accordance with 10 CFR 50.55a(a)(3)

[10 CFR 50.55a(z)] and 10 CFR 50.55a(g)(4)(iv), licensees must submit any requested amendments to ensure their TS remain consistent with the code of record or NRC-approved alternatives.

Regulatory Issue Summary (RIS) 2010-06 also states:

The TS, TRM, or other licensee-controlled documents, governing the snubber ISI and testing program, do not eliminate the 10 CFR50.55a requirements to update the program at 120-month intervals, in accordance with 10 CFR 50.55a(g)(4), or to request and receive NRC authorization for alternatives to the Code requirements, when appropriate.

Provide details on any actions taken for the snubber program at SLP-1 in response to RIS 2010-06 and Enforcement Guidance Memorandum 2010-01.

#### **RAI 4**

The regulation in 10 CFR 50.36(c)(3), "Surveillance requirements," states, "Surveillance requirements are requirements 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 limiting conditions for operation will be met."

The proposed amendment request would delete the specific requirements for demonstrating snubber operability, which is currently in SR 4.7.10. A reference to "SR 4.7.10, Snubber Test Program" would be added in place of the specific requirements. The proposed changes in the license amendment request do not provide sufficient detail necessary to adequately demonstrate snubber operability as per 10 CFR 50.36(c)(3). Please reference 10 CFR 50.36(c)(3) as part of the basis for the proposed TS change and provide sufficient detail necessary to adequately demonstrate snubber operability.

#### **RAI 5**

Attachment 4 of the letter dated July 15, 2015, "Comparison of Current TS Requirements to Revised ISI Snubber Program Assessment."

- (a) Please provide the edition and addenda of the ASME OM Code that is used for the comparison.
- (b) The comparison table, second column, "Revised ISI Program Requirement," pages 3 and 4 of 8, states that "...ISTD-4270 requires that snubbers that do not meet examination requirements of ISTD-4230 shall be evaluated to determine the root cause of the unacceptability..." This wording does not match the requirements of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda (if the comparison table is based on the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda). Please explain the discrepancy.

**RAI 6**

Attachment 5 of the letter dated July 15, 2015, SLP-1, "Snubber Testing Program Plan, Fourth 10-Year Interval February 11, 2008 to February 10, 2018."

- (a) The proposed snubber program is for the fourth 10-year ISI interval. The fourth 10-year interval already started on February 11, 2008. Attachment 5 to the letter dated July 15, 2015, stated that the proposed snubber program is applicable from February 11, 2008, through February 10, 2018. It is not clear to the NRC staff how the proposed snubber program could be applicable from February 11, 2008, to the submittal date of July 15, 2015. It appears that the proposed snubber program can only be applicable starting from the submittal date of July 15, 2015, to the end of the fourth ISI interval of February 10, 2018. Please explain how the proposed snubber program would be applicable from February 11, 2008, to July 15, 2015.
- (b) Section 2.3 of the submittal states that, "The service life of all snubbers shall be monitored and snubbers evaluated, replaced, or reconditioned in accordance with OSP-73.01, QI-10-PR/PSL-6 and ISTD-6200 to ensure that the service life is not exceeded between surveillance inspections..." Please note that ISTD-6200 requires that service life be evaluated at least once each fuel cycle. Explain the discrepancy and modify the subject sentence as appropriate.

M. Nazar

- 2 -

If you have any questions, please contact me at (301) 415-1447 or [Farideh.Saba@nrc.gov](mailto:Farideh.Saba@nrc.gov).

Sincerely,

*/RA JLamb for/*

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-335

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Request for Additional Information

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**ADAMS Accession No.: ML15336A888**

\*by e-mail

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DATE	12/15/2015	12/16/2015	

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