



FPL

January 21, 2016

L-2016-012
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

References:

1. FPL Letter L-2015-170 dated July 14, 2015, "Application for Technical Specification Change to Remove the 10 Year Sediment Cleaning of the Fuel Oil Storage Tank and Relocate to Licensee-Controlled Documents," Adams Accession No. ML 15198A032.
2. NRC Email dated December 4, 2015, "Draft St. Lucie RAI (Fuel Oil Storage Tank Sediment Cleaning)."

In Reference 1, Florida Power & Light Company (FPL) submitted a proposed license amendment that would relocate the Technical Specification (TS) Surveillance Requirements of (SR) 4.8.1.1.2.g to the Updated Final Safety Analysis Report (UFSAR) for St. Lucie Unit 1 and the UFSAR for St. Lucie Unit 2. In reference 2, the NRC provided a request for additional information (RAI) needed for the Staff to complete its review of the application. The Enclosure to this letter provides FPL's response to the RAI and contains new TS markups consistent with the RAI response. The original no significant hazards evaluation provided in the Reference 1 bounds this response.

Please contact Mr. Ken Frehafer at 772-467-7748 if there are any questions about this submittal.

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

Executed on January 21, 2016

Sincerely,

Christopher R. Costanzo
Site Vice President
St. Lucie Plant

Enclosure

cc: USNRC Regional Administrator, Region II
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant

ADD
NRR

**FPL Response to Request for Additional Information
St. Lucie, Unit 1 and 2 (Dockets 50-335 and 50-389)
License Amendment Request for Technical Specification Change
to Remove the 10 Year Sediment Cleaning of the Fuel Oil Storage Tank and Relocate
to Licensee-Controlled Documents
(MF6488 & MF6489)**

NRC RAI MF6488/MF6489-SBPB-01

BACKGROUND:

As required by 10 CFR 50.36(c)(3), Surveillance Requirement (SR) are the requirements related 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 Condition for Operations (LCOs) will be met.

In the subject St. Lucie License Amendment Request (LAR), the current Technical Specification (TS) SR 4.8.1.1.2.g for Unit 2 reads as follows:

- 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 American Society of Mechanical Engineers (ASME) Code in accordance with the Inservice Inspection Program.

It should be noted that this LAR also proposed changes to the Unit 1 SR requirements, but the current Unit 1 SRs differ slightly from the current Unit 2 SRs.

ISSUE:

Although the LAR includes discussion of the cleaning requirement portion of SR, the SR 4.8.1.1.2.g.2 contains pressure testing requirement for portions of the fuel oil system, which was not addressed in Technical Specification Task Force-2, nor included in the other precedent plants TSs referenced in LAR. The staff is unable to locate any discussion or basis for removal/relocation of this fuel oil system pressure testing SR.

RAI:

Please explain the rationale behind the removal of the pressure tests of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code for each unit. Include the following in your explanation:

1. Describe how the diesel fuel oil system is classified as an ASME Code Class 3 system, as specified in current TSs.
2. Verify that TS 4.0.5 contains the equivalent SR for inservice inspection and testing of ASME Code Class 1, 2, and 3 components and is applicable to the pressure testing of the diesel fuel oil system.
3. Explain how the regulations at 10 CFR 50.36 (c)(2) and 10 CFR 50.36 (c)(3) will continue to be met for LCO 3.8.1 after the removal of the pressure tests
4. Provide a description of the location where a commitment to a 10-year surveillance frequency for pressure testing of the fuel oil system will be maintained.

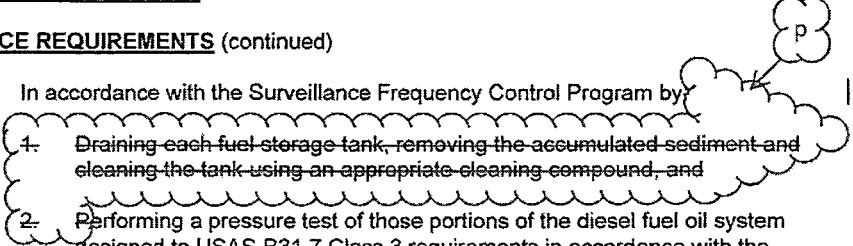
FPL Response

FPL proposes to reinstate the pressure test portions of the applicable TSSRs. The following TS markups and corresponding word-processed TSs supersede those provided in the original application.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (continued)

g. In accordance with the Surveillance Frequency Control Program 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.

ELECTRICAL POWER SYSTEMS

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. In accordance with the Surveillance Frequency Control Program 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. In accordance with the Surveillance Frequency Control Program 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.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (continued)

- g. In accordance with the Surveillance Frequency Control Program by 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.

ELECTRICAL POWER SYSTEMS

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. In accordance with the Surveillance Frequency Control Program 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. In accordance with the Surveillance Frequency Control Program by 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.