



FPL

January 28, 2016

L-2016-018
10 CFR 50.90

U. S. Nuclear Regulatory Commission
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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. FPL 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
3. FPL Letter L-2015-270 dated October 23, 2015, "RAI Reply Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements," Accession Number ML15303A255
4. NRC Letter dated December 16, 2015, "St. Lucie Plant, Unit No. 1 - Request for Additional Information Regarding License Amendment Request for Changes to the Snubber Surveillance Requirements (CAC No. Mf6490)," Accession Number ML15336A888

In Reference 1, Florida Power & Light Company (FPL) submitted a proposed amendment that 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 3, FPL responded to a NRC RAI provided in Reference 2. In Reference 4, the NRC identified additional RAIs. The attachment to this letter provides FPL's response to these RAIs. These responses are bounded by the original no significant hazards evaluation. If you should have any questions, please contact Mr. Ken Frehafer at (772) 467-7748.

A047
NRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 28, 2016.

Sincerely,

Handwritten signature of Christopher R. Costanzo in black ink.

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

REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT REQUEST
CHANGES TO SNUBBER SURVEILLANCE REQUIREMENTS
FLORIDA POWER AND LIGHT COMPANY (FPL)
ST. LUCIE UNIT 1
DOCKET NO. 50-335
TAC No. MF6490

References

1. Letter from Florida Power and Light, to NRC, "St. Lucie Unit 1, Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements, dated July 15, 2015 (ADAMS Accession No. ML15198A029).
2. St. Lucie Unit 1, Docket No. 50-335, Fourth Ten-Year Inservice Inspection Interval ISI Program Plan - Revision 0 (ADAMS Accession No. ML080810193).
3. Regulatory Issue Summary (RIS) 2010-06, Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers).

To complete its review, the Nuclear Regulatory Commission (NRC) staff requests the following additional information.

RAI 1

Attachment 1 of July 15, 2015 submittal (Reference 1), "Description and Assessment", Section 2.0, Detailed Description, Page 1, states that St. Lucie Unit 1 fourth 10-year ISI interval began February 11, 2008 and will continue until February 10, 2018. Currently, as described in Technical Specifications (TS), TS 3/4.7.10 and FPL Fourth 10-Year Inspection Interval 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 10 CFR 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 (ASME) Operation and Maintenance (OM) Code, the 2001 Edition through 2003 Addenda. As allowed by 10 CFR 50.55a(g)(4)(iv), FP&L 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 St. Lucie Unit 1 Fourth 10-year ISI interval, subject to Commission approval.

Section 1.6.1.20 of Reference 2, dated March 13, 2008, states that "St. Lucie 1 will utilize the option in 10CFR50.55a(b)(3)(v) to implement Subsection ISTD of the 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 any license amendment request was submitted to the NRC to ensure that TS is consistent with the 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 thru 2003 addenda as required by 10

CFR 50.55a(b)(3)(v).

- (c) Please provide the dates when St. Lucie Unit 1 will start using the snubber program based on the ASME OM Code, the 2004 Edition through 2005 and 2006 addenda as discussed in Attachment 5 of the submittal.

RAI 1 RESPONSE

- (a) A snubber program self-assessment (CR 2008-1302) was performed at St. Lucie Unit 1 & 2 during the first quarter, 2008 confirming that the snubber program, as implemented at that time, met both the requirements of the Technical Specifications and the requirements of the ASME OM Code, Subsection ISTD, 2001 Edition w/ 2003 Addenda. Therefore, no relief was requested.
- (b) The VT-3 visual examination method as described in IWA-2213 or IWA-2213(a)) was used as required by 10 CFR 50.55a(b)(3)(v).
- (c) St. Lucie Unit 1 will start using the snubber program based on the ASME OM Code, the 2004 Edition through 2005 and 2006 addenda as discussed in Attachment 5 of the submittal within 60 days of NRC approval of the proposed Technical Specification changes.

RAI 2

By Federal Register Notice 79 FR 65776, dated November 5, 2014, which became effective on December 5, 2014, the paragraphs 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 followings:

- (a) Reference 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) Reference 1, Page 2 of 5, Section 3.0 "Technical Evaluation," second paragraph, in sixth line, the referenced 10 CFR 50.55a(3) should be changed to 10 CFR 50.55a(z).

RAI 2 RESPONSE

FPL inadvertently referenced the old regulations in the original application. Therefore, this RAI reply serves to provide reference to the applicable regulation as follows:

- (a) Reference 1, Page 1 of 5, Section 3.0 "Technical Evaluation," first paragraph, the referenced regulation 10 CFR 50.55a(a)(3) should be read as 10 CFR 50.55a(z).
- (b) Reference 1, Page 2 of 5, Section 3.0 "Technical Evaluation," second paragraph, in sixth line, the referenced 10 CFR 50.55a(3) should be read as 10 CFR 50.55a(z).

RAI 3

Reference 1, Section 3.0, "Technical Evaluation," the second paragraph states that "As noted in Regulatory Issue Summary (RIS) 2010-006, the licensees have the option to control the ASME Code-required ISI and testing of snubbers through their TS or other licensee-control 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), licensees must submit any required amendments to ensure their TS remain consistent with the new code of record or NRC-approved alternatives.”

RIS 2010-06 also states that “The TS, TRM, or other licensee-controlled documents, governing the snubber ISI and testing program, do not eliminate the 10 CFR 50.55a 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 St. Lucie Unit 1 in response to RIS-2010-006 and Enforcement Guidance Memorandum (EGM) 2010-01.

RAI 3 RESPONSE

A snubber program self-assessment (CR 2008-1302) was performed at St. Lucie Unit 1 & 2 during the first quarter, 2008. The assessment confirmed that the snubber program, as implemented at that time, met both the requirements of the Technical Specifications and the requirements of the ASME OM Code, Subsection ISTD 2001 Edition w/ 2003 Addenda. Based upon the results of this assessment, the Snubber Program Owner’s review of RIS-2010-006 and his knowledge of the snubber program at St. Lucie, it was concluded that the snubber program requirements were in accordance with both the Technical Specification requirements and the ASME OM Code, Subsection, ISTD requirements. A copy of this assessment can be provided upon request.

RAI 4

Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36(c)(3), “Surveillance Requirements,” states that, “...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, currently in surveillance requirement (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 4 RESPONSE

The Snubber Testing Program would demonstrate snubber operability by performing testing and inspections equivalent to the previously approved SR contained in the TS. A comparison of the current TS requirements to the proposed OM Code Snubber Testing Program is detailed in Attachment 4 of the amendment request to demonstrate that the Snubber Testing Program provides a level of testing and inspections equivalent to the current SR. The Snubber Testing Program is consistent with 10 CFR 50.55a and is sufficient to demonstrate whether snubbers are operable in accordance with TS 3.7.10. Therefore, the proposed change to SR 4.7.10 is consistent with the requirements in 10 CFR 50.36(c)(3) and, therefore, is acceptable.

RAI 5

Attachment 4 of the July 15, 2015 submittal discusses "Comparison of Current TS Requirements to Revised ISI Snubber Program assessment."

- (a) Please provide the edition and addenda of the ASME OM Code which is used for the comparison.
- (b) The comparison Table, second column, "Revised ISI Program Requirement for TS 4.7.10.c (page 3 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..." These wordings are not matching with 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 5 RESPONSE

- (a) The comparison Table in Attachment 4 is based on the ASME OM Code, 2004 Edition with 2005 and 2006 addenda.
- (b) The words in the Table should reflect the change that was made to the 2005 Addenda as follows: ISTD-4270: Snubbers that do not meet examination requirements of ISTD-4230 shall be evaluated to determine the cause of the unacceptability.

RAI 6

Attachment 5 of July 15, 2015 submittal, St. Lucie Unit 1, Snubber Testing Program Plan.

- (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 of the submittal stated that the proposed snubber program is applicable from February 11, 2008 through February 10, 2018. It is not clear to the NRC staff that 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 service life be evaluated at least once each fuel cycle. Explain the discrepancy and modify the subject sentence as appropriate.

RAI 6 RESPONSE

- (a) St. Lucie Unit 1 Fourth 10-year ISI interval began February 11, 2008 and will continue until February 10, 2018. Currently, as described in Technical Specifications, TS 3/4.7.10 and FPL Fourth 10-Year Inspection Interval Program submittal letter L-2008-043, dated March 13, 2008, (ML080810193) snubber testing and examinations are performed in accordance with the

requirements of 10 CFR 50.55a(b)(3)(v), which allows the use of Subsection ISTD. FPL is proposing the use of Subsection ISTD, of the ASME OM Code, 2004 Edition with 2005 and 2006 Addenda for the remainder of the SLU1 Fourth 10-year ISI interval, subject to Commission approval, as allowed by 10 CFR 50.55a(g)(4)(iv). The Snubber Testing Program Plan cover page will be revised to reflect the implementation date of the Snubber Testing Program Plan for the remainder of the Fourth 10-year ISI Interval, as shown in the following page.

- (b) The service life of all snubbers shall be monitored and snubbers evaluated, replaced, or reconditioned in accordance with all three referenced documents, OSP-73.01, QI-10-PR/PSL-6 and ISTD-6200. FPL recognizes that ISTD-6200 requires service life be evaluated at least once each fuel cycle. Since paragraph ISTD-6200 is incorporated by reference, the exact wording of ISTD has not been repeated throughout the Snubber Testing Program Plan. These referenced procedures, OSP-73.01, and QI-10-PR/PSL-6, can be made available for review onsite upon request.

St. Lucie Plant Unit 1

Snubber Testing Program Plan

**Fourth 10 – Year Interval
Beginning [Within 60 days of NRC Approval]
Ending – February 10, 2018**

Revision 0

**Florida Power & Light Company
St. Lucie Plant
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