



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

July 28, 2016

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 NOS. 1 AND 2 - ISSUANCE OF AMENDMENTS REGARDING TECHNICAL SPECIFICATION CHANGE TO REMOVE THE FUEL OIL STORAGE TANK CLEANING REQUIREMENT AND INCLUDE FUEL OIL STORAGE TANK CLEANING IN LICENSEE-CONTROLLED DOCUMENTS (CAC NOS. MF6488 AND MF6489)

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has issued the enclosed Amendment Nos. 233 and 183 to Renewed Facility Operating License Nos. DPR-67 and NPF-16 for the St. Lucie Plant, Unit Nos. 1 and 2, respectively. These amendments change the Technical Specifications in response to Florida Power & Light Company's application dated July 14, 2015 (L-2015-170), as supplemented by letters dated January 21 (L-2016-012), and July 15, 2016 (L-2016-143).

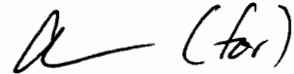
The proposed amendments would remove Surveillance Requirement 4.8.1.1.2.g.1 related to fuel oil storage tank cleaning from the Technical Specifications and include fuel oil storage tank cleaning in the Updated Final Safety Analysis Reports for St. Lucie Units 1 and 2, which the licensee is required to control by the provisions set forth in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.59, "Changes, tests, and experiments."

M. Nazar

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The NRC staff's safety evaluation of the amendments is enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Perry H. Buckberg", followed by the word "(for)" in parentheses.

Perry H. Buckberg, Senior Project Manager
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosures:

1. Amendment No. 233 to DPR-67
2. Amendment No. 183 to NPF-16
3. Safety Evaluation

cc w/enclosures: Distribution via Listserv



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

FLORIDA POWER AND LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 233
Renewed License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (FPL, the licensee), dated July 14, 2015, as supplemented by a letters dated January 21, and July 15, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Renewed Facility Operating License No. DPR-67 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 233, are hereby incorporated in the renewed license. FPL shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance. Implementation of the amendment shall also include revision of the Updated Final Safety Analysis Report and related procedures as described in the licensee's application dated July 14, 2015, as supplemented by letters dated January 21, and July 15, 2016, and as evaluated in the staff's safety evaluation enclosed with this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION



Tracy J. Orf, Acting Chief
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: July 28, 2016

ATTACHMENT TO LICENSE AMENDMENT NO. 233
TO RENEWED FACILITY OPERATING LICENSE NO. DPR-67
ST. LUCIE PLANT UNIT NO. 1
DOCKET NO. 50-335

Replace Page 3 of Renewed Operating License DPR-67 with the attached Page 3.

Replace the following pages of Appendix A, Technical Specifications, with the attached pages. The revised pages are identified by amendment number and contains a vertical line indicating the area of change.

Remove Page
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Insert Page
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applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

A. Maximum Power Level

FPL is authorized to operate the facility at steady state reactor core power levels not in excess of 3020 megawatts (thermal).

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 233 are hereby incorporated in the renewed license. FPL shall operate the facility in accordance with the Technical Specifications.

Appendix B, the Environmental Protection Plan (Non-Radiological), contains environmental conditions of the renewed license. If significant detrimental effects or evidence of irreversible damage are detected by the monitoring programs required by Appendix B of this license, FPL will provide the Commission with an analysis of the problem and plan of action to be taken subject to Commission approval to eliminate or significantly reduce the detrimental effects or damage.

C. Updated Final Safety Analysis Report

The Updated Final Safety Analysis Report supplement submitted pursuant to 10 CFR 54.21(d), as revised on March 28, 2003, describes certain future activities to be completed before the period of extended operation. FPL shall complete these activities no later than March 1, 2016, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

The Updated Final Safety Analysis Report supplement as revised on March 28, 2003, described above, shall be included in the next scheduled update to the Updated Final Safety Analysis Report required by 10 CFR 50.71(e)(4), following issuance of this renewed license. Until that update is complete, FPL may make changes to the programs described in such supplement without prior Commission approval, provided that FPL evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

D. Sustained Core Uncovery Actions

Procedural guidance shall be in place to instruct operators to implement actions that are designed to mitigate a small-break loss-of-coolant accident prior to a calculated time of sustained core uncovery.

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.



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

FLORIDA POWER AND LIGHT COMPANY

ORLANDO UTILITIES COMMISSION OF THE CITY OF ORLANDO, FLORIDA

AND

FLORIDA MUNICIPAL POWER AGENCY

DOCKET NO. 50-389

ST. LUCIE PLANT, UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 183
Renewed License No. NPF-16

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (FPL, the licensee), dated July 14, 2015, as supplemented by a letters dated January 21, and July 15, 2016, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

Enclosure 2

2. Accordingly, the license is amended by changes to the Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Renewed Facility Operating License No. NPF-16 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 183, are hereby incorporated in the renewed license. FPL shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance. Implementation of the amendment shall also include revision of the Updated Final Safety Analysis Report and related procedures as described in the licensee's application dated July 14, 2015, as supplemented by letters dated January 21, and July 15, 2016, and as evaluated in the staff's safety evaluation enclosed with this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION



Tracy J. Orf, Acting Chief
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: July 28, 2016

ATTACHMENT TO LICENSE AMENDMENT NO. 183
TO RENEWED FACILITY OPERATING LICENSE NO. NPF-16
ST. LUCIE PLANT, UNIT NO. 2
DOCKET NO. 50-389

Replace Page 3 of Renewed Operating License NPF-16 with the attached Page 3.

Replace the following pages of Appendix A, Technical Specifications, with the attached pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change.

Remove Page
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Insert Page
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neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required.

- D. Pursuant to the Act and 10 CFR Parts 30, 40, and 70, FPL to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- E. Pursuant to the Act and 10 CFR Parts 30, 40, and 70, FPL to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

- 3. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission's regulations: 10 CFR Part 20, Section 30.34 of 10 FR Part 30, Section 40.41 of 10 CFR Part 40, Section 50.54 and 50.59 of 10 CFR Part 50, and Section 70.32 of 10 CFR Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

- A. Maximum Power Level

FPL is authorized to operate the facility at steady state reactor core power levels not in excess of 3020 megawatts (thermal).

- B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 183 are hereby incorporated in the renewed license. FPL shall operate the facility in accordance with the Technical Specifications.

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 prelude period.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION FOR
AMENDMENT NO. 233 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-67 AND
AMENDMENT NO. 183 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-16
FLORIDA POWER AND LIGHT COMPANY, ET AL.
ST. LUCIE PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-335 AND 50-389

1.0 INTRODUCTION

By application dated July 14, 2015 (L-2015-170),¹ as supplemented by letters dated January 21 (L-2016-012),² and July 15, 2016 (L-2016-143),³ Florida Power & Light Company (the licensee) requested changes to the Technical Specifications (TSs) for the St. Lucie Plant, Unit Nos. 1 and 2 (St. Lucie 1 and 2), which are contained in Appendix A of Renewed Facility Operating License Nos. DPR-67 and NPF-16. The licensee proposed to remove Surveillance Requirement (SR) 4.8.1.1.2.g.1, which pertains to cleaning the diesel fuel oil storage tanks from TS 3/4.8.1, "A.C. [Alternating Current] Sources," from each unit's TSs. The licensee requested to include the content of SR 4.8.1.1.2.g.1 for each unit in the Updated Final Safety Analysis Reports (UFSARs) for St. Lucie 1 and 2. The licensee also requested a conforming change to renumber SR 4.8.1.1.2.g.2 to SR 4.8.1.1.2.g.

By electronic mail dated December 14, 2015,⁴ and June 17, 2016,⁵ the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff sent the licensee requests for additional information (RAIs). By letters dated January 21, and July 15, 2016, the licensee responded to the RAIs. The licensee's letters dated January 21, and July 15, 2016, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination, which was published in the *Federal Register* (FR) on September 29, 2015 (80 FR 58518).

¹ Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A032.

² ADAMS Accession No. ML16048A248.

³ ADAMS Accession No. ML16201A190.

⁴ ADAMS Accession No. ML15348A389.

⁵ ADAMS Accession No. ML16169A205.

2.0 REGULATORY EVALUATION

2.1. Description of the St. Lucie Diesel Generator Fuel Oil System Design and Requirements

The onsite ac and dc power systems at St. Lucie are designed with redundancy and independence of onsite power sources, buses, switchgear, distribution cabling and controls to provide reliable supply of electrical power to safety related electrical loads needed to achieve safe plant shutdown or to mitigate the consequences of a design basis accident. In the event of a loss of the normal ac power sources, onsite emergency ac power is supplied by onsite emergency diesel generators and station batteries. Fuel oil is required for the operation of the emergency diesel generators.

The diesel generator fuel oil systems at St. Lucie 1 and 2 store and transfer diesel fuel oil from the onsite storage tanks to the day tanks that supply the emergency diesel generator sets. The diesel generator fuel oil systems at St. Lucie 1 and 2 are independently capable of supplying sufficient fuel to the respective diesel generator sets. One diesel oil storage tank and two day tanks per engine set are provided with a combined usable volume that is sufficient for at least 7 days of accident load operation of one diesel generator set. The fuel oil 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.

The St. Lucie 1 and 2 TS SR 4.8.1.1.2.g.1 requires that in accordance with the Surveillance Frequency Control Program (SFCP), each diesel generator be demonstrated operable by draining each fuel storage tank, removing the accumulated sediment and, for Unit 1, cleaning the tank using an appropriate cleaning compound and, for Unit 2, cleaning the tank using a sodium hypochlorite solution. TS SR 4.8.1.1.2.g.2 requires that each diesel generator be demonstrated operable by performing a pressure test of some portions of the diesel fuel oil system.

2.2 Requested Changes

The licensee requested to delete SR 4.8.1.1.2.g.1 from the Unit 1 and 2 TSs and to renumber SR 4.8.1.1.2.g.2 to SR 4.8.1.1.2.g. The licensee also requested that information in the deleted SR be placed in the UFSARs and be controlled in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.59, "Changes, tests and experiments." In its letter dated July 14, 2015, the licensee requested that both SR 4.8.1.1.2.g.1 and 4.8.1.1.2.g.2 be deleted from the TSs; however, by letter dated January 21, 2016, the licensee reduced the scope of the request by proposing to delete only SR 4.8.1.1.2.g.1 and, hence, renumber SR 4.8.1.1.2.g.2. In its letter dated July 15, 2016, the licensee clarified that upon approval of the request, it would also place some of the TS Bases verbiage into the UFSAR and that the SR 4.8.1.1.2.g.1 description placed in the UFSAR would no longer reference the SFCP. Rather, the UFSAR would reflect the frequency at the time these amendments are approved.

2.3 Regulatory Review

The NRC staff reviewed the licensee's application to ensure that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) activities proposed will be conducted in compliance with the

Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or the health and safety of the public. The NRC staff considered the following regulatory requirements, guidance, and licensing and design-basis information during its review of the proposed changes.

Section 182a of the Atomic Energy Act of 1954, as amended, requires applicants for nuclear power plant operating licenses to include the TSs as part of the operating license. The Commission's regulatory requirements related to the content of TSs are set forth in 10 CFR, Section 50.36, "Technical specifications," which requires that the TSs include items in specific categories, including: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls.

Paragraph 50.36(c)(2)(i) of 10 CFR states that LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility, and when an LCO is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met.

Paragraph 50.36(c)(3) of 10 CFR states that SRs 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 LCOs will be met.

Paragraph 50.34(b) of 10 CFR states that the Final Safety Analysis Report (FSAR) shall include information that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components and of the facility as a whole. This regulation also states that the FSAR shall include a description and analysis of the structures, systems, and components of the facility, with emphasis upon performance requirements; the bases, with technical justification therefore, upon which such requirements have been established; and the evaluations required to show that safety functions will be accomplished.

Paragraph 50.59(c)(1) of 10 CFR states that a licensee can make changes in the facility or procedures as described in the UFSAR and conduct tests or experiments not described in the UFSAR without obtaining a license amendment pursuant to 10 CFR 50.90 if none of the criteria in 10 CFR 50.59(c)(2) are met. Paragraph 50.59(c)(3) of 10 CFR states that the UFSAR is considered to include FSAR changes resulting from evaluations performed pursuant to 10 CFR 50.59 and analyses performed pursuant to 10 CFR 50.90 since submittal of the last UFSAR pursuant to 10 CFR 50.71.

The Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, which was published in the *Federal Register* on July 22, 1993 (58 FR 39132), presents the policy of the NRC with respect to the scope and purpose of TSs as required by 10 CFR 50.36 and establishes the guidance for determining which operating restrictions should be included in the TSs. The policy encourages licensees to update their TSs to be consistent with the improved Standard Technical Specifications (STTs).

NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Section 16.0, "Technical Specifications,"

Revision 3,⁶ contains guidance for reviews of TSs. The NRC staff prepared improved STSs for each of the LWR nuclear steam supply systems and associated balance-of-plant equipment systems. The staff uses this guidance in its reviews of TS changes to help it determine if the content and format of proposed changes are consistent with the applicable STSs. The staff reviewed the licensee's application against the STSs in NUREG-1432, Revision 4, "Standard Technical Specifications – Combustion Engineering Plants," Volumes 1 and 2.⁷

NRC Regulatory Guide (RG) 1.137, "Fuel-Oil Systems for Standby Diesel Generators," Revision 1,⁸ describes methods that the NRC considers acceptable for use in complying with requirements for fuel oil systems for standby diesel powered generators, including assurance of adequate fuel oil quality. RG 1.137, Revision 1 states that as a minimum, the fuel oil stored in the supply tanks should be removed, the accumulated sediment removed, and the tanks cleaned at 10-year intervals.

3.0 TECHNICAL EVALUATION

The staff compared the licensee's proposal against the regulatory criteria in Section 2.0 of this safety evaluation. LCO 3.8.1.1.b requires, for operation in Modes 1, 2, 3 and 4, that as a minimum, two separate and independent diesel generator sets shall be operable, each with engine-mounted fuel tanks containing a minimum volume of fuel, a separate fuel storage system containing a minimum volume of fuel, and a separate fuel transfer pump. SR 4.8.1.1.2 addresses LCO 3.8.1.1.b by stating the surveillance requirements needed to demonstrate diesel generator operability. SR 4.8.1.1.2 contains multiple steps and sub-steps addressing topics such as diesel start time, how often accumulated water must be removed from the fuel storage tank, and the response to a loss of offsite power. Accordingly, the staff evaluated the licensee's request to determine whether periodic removal of any sediment that had accumulated in the storage tank, and cleaning of the storage tank, is a necessary part of what the licensee must do to demonstrate that each diesel generator is operable.

In its letter dated June 14, 2015, the licensee stated that SR 4.8.1.1.2.g is a maintenance activity and is not a necessary surveillance to demonstrate the operability of the diesel generators and that fuel oil would continue to be maintained within acceptable quantity and quality limits with relocation of the SR content to the UFSAR. The licensee also stated that operability of a diesel generator and its associated fuel oil system are ensured by other TSs and SRs, which would remain unchanged by the amendments. The licensee stated that limits of TS 6.8.4.n, "Diesel Fuel Oil Testing Program," and performance of SRs 4.8.1.1.2.a and 4.8.1.1.2.c help ensure that fuel oil tank sediment is minimized and that any degradation of the tank wall surface that results in a fuel oil volume reduction is detected and corrected in a timely manner.

SR 4.8.1.1.2.a requires, among other items, the licensee to verify fuel levels and fuel transfer capability in accordance with the SFCP. SR 4.8.1.1.2.b requires, among other items, the licensee to remove accumulated water from the storage tanks in accordance with the SFCP. SR 4.8.1.1.2.c requires the licensee to test and maintain new and stored fuel oil properties in

⁶ ADAMS Accession No. ML100351425.

⁷ ADAMS Accession Nos. ML12102A165 and ML12102A169.

⁸ ADAMS Accession No. ML003740180.

accordance with the Diesel Fuel Oil Testing Program, which is in TS 6.8.4.n. The Diesel Fuel Oil Testing Program requires a testing program of both new and stored fuel oil and includes a requirement that total particulate concentration of the fuel oil be within certain limits when tested every 31 days.

The NRC staff determined that the existing requirements in SRs 4.8.1.1.2.a, 4.8.1.1.2.b, and 4.8.1.1.2.c and TS 6.8.4.n are sufficient to assure that the stored fuel oil is maintained with the necessary quantity and quality, and a TS requirement on sediment removal and tank cleaning is not needed to demonstrate that the diesel generators are operable. SR 4.8.1.1.2.a requires fuel transfer capability and a minimum level and volume of fuel is maintained in the tank, which assures tank sediment is minimized. SR 4.8.1.1.2.b and 4.8.1.1.2.c require that the fuel oil is of the necessary quality in accordance with the fuel oil properties defined in the TS 6.8.4.n. TS 6.8.4.n limits the water and sediment content of the fuel oil, which also assures that tank sediment is minimized.

The staff confirmed the proposed change is consistent with NUREG-1432, Revision 4. The improved STSs do not contain an SR to clean the fuel oil storage tank. The SR was removed from the STSs through the incorporation of Technical Specifications Task Force Traveler-2, "Relocate the 10-Year Sediment Cleaning of the Fuel Oil Storage Tank to Licensee Control."⁹ Therefore, the licensee's request appears to be consistent with the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," with respect to updating its TSs to be consistent with the improved STSs.

The licensee requested that the content of SR 4.8.1.1.2.g.1 be placed in the UFSARs. The licensee stated that following NRC approval of this proposed amendment, changes to the relocated requirements will be controlled by the provisions of 10 CFR 50.59 to determine if prior NRC approval is required. The NRC staff determined that relocation of the SR content into the UFSARs provides reasonable assurance that the licensee will continue to clean the fuel oil storage tanks and remove sediment. Section 50.59 of 10 CFR requires the licensee to determine whether any changes to the content placed in the UFSAR will need prior NRC approval via a license amendment.

The St. Lucie TS Bases¹⁰ state that the SRs for demonstrating the operability of the diesel generators are in accordance with the recommendations of RG 1.137, Revision 1. Conformance with RG 1.137, Revision 1, Section C.2.f helps ensure that the fuel oil stored in the supply tanks is removed, the accumulated sediment is removed, and the tanks are cleaned at 10-year intervals. In its letter dated July 15, 2016, the licensee stated, "FPL will relocate and consolidate the RG 1.137 verbiage that currently exists within the TS Bases into the TS surveillance requirement being relocated to the UFSAR." In addition to the requirements in TS 6.8.4.n and SRs 4.8.1.1.2.a, 4.8.1.1.2.b, and 4.8.1.1.2.c, the staff concludes that having the RG 1.137 verbiage from the TS Bases placed into the UFSARs provides additional assurance that the fuel storage tanks are cleaned and the sediment is removed.

SR 4.8.1.1.2.g.1 currently refers to the licensee's SFCP for determining the SR frequency. In its letter dated July 15, 2016, the licensee clarified that the frequency placed into the UFSARs will

⁹ ADAMS Accession No. ML040360147.

¹⁰ ADAMS Accession Nos. ML14133A008 for Unit 1 and ML14302A265 for Unit 2.

no longer reference the SFCP and will instead reflect the current frequency at the time the amendments are approved. Therefore, the staff determines that upon placing the details of SR 4.8.1.1.2.g.1 in the UFSARs, the SFCP will no longer be applicable to the content placed in the UFSARs, and the licensee is required to make any changes to the UFSARs in accordance with 10 CFR 50.59.

Based on this evaluation, the NRC staff concludes that SR 4.8.1.1.2.g.1 is not needed to demonstrate that each diesel generator is operable and that LCO 3.8.1.1.b is being met and, therefore, does not meet the requirements of 10 CFR 50.36 for inclusion in the plant's TSs. Additionally, the staff concludes that the changes are also in alignment with NUREG-1432 and do not diminish the level of safety found in the current TSs and remaining SRs. The NRC staff finds these changes acceptable and, therefore, removing SR 4.8.1.1.2.g.1 from the TS and adding diesel fuel oil storage tank cleaning and sediment removal to the St. Lucie 1 and 2 UFSARs is acceptable. The staff concludes that with the removal of SR 4.8.1.1.2.g.1 and the renumbering of SR 4.8.1.2.g.2 to SR 4.8.1.1.2.g, the requirements of 10 CFR 50.36(c)(3) will continue to be met.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, on April 12, 2016, the NRC staff notified the State of Florida official (Ms. Cynthia Becker, M.P.H., Chief of the Bureau of Radiation Control, Florida Department of Health) of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change inspection or surveillance requirements or requirements with respect to installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff determined that the amendments involve no significant change in the types, or significant increase in, the amounts of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. By *FR* notice dated September 29, 2015 (80 FR 58518), the Commission previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on these findings. Accordingly, the amendments meet 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 need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the aforementioned considerations, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Gordon Curran
Pete Snyder
Audrey Klett
Perry Buckberg

Date: July 28, 2016

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The NRC staff's safety evaluation of the amendments is enclosed. A Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA AKlett for/

Perry H. Buckberg, Senior Project Manager
Plant Licensing Branch II-2
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosures:

1. Amendment No. 233 to DPR-67
2. Amendment No. 183 to NPF-16
3. Safety Evaluation

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