



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

May 25, 2016

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

SUBJECT: ST. LUCIE PLANT, UNIT 1 - ISSUANCE OF AMENDMENT REGARDING
CHANGES TO THE SNUBBER SURVEILLANCE REQUIREMENTS
(CAC NO. MF6490)

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission (NRC) has issued the enclosed Amendment No. 232 to Renewed Facility Operating License No. DPR-67 for the St. Lucie Nuclear Plant (St. Lucie), Unit 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 15, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A029), as supplemented by letters dated October 23, 2015 (ADAMS Accession No. ML15303A255) and January 28, 2016 (ADAMS Accession No. ML16053A097).

This amendment revises St. Lucie Unit 1 TSs Surveillance Requirements (SR) for snubbers to conform to revisions to the Snubber Testing Program. In addition, the licensee proposed to use a later Edition and Addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through 2006 Addenda for the remainder of the fourth 10-year inservice inspection (ISI) and testing of snubbers at St. Lucie Unit 1.

Specifically, the amendment revises the TS SR 4.7.10 to delete detailed snubber ISI and testing requirements and reference the newly added Administrative Control, TS Section 6.8.4.p, "Snubber Testing Program," which includes the planned revisions to the St. Lucie Unit 1 snubber ISI, testing, and service life monitoring programs.

The fourth 10-year ISI interval at St. Lucie Unit 1 began on February 11, 2008, and is scheduled to end February 10, 2018. Currently, snubber examination and testing are performed in accordance with the specific requirements of TS 3/4.7.10 and the St. Lucie Unit 1 Plant Procedures. Pursuant to this amendment for the rest of the fourth 10-year ISI interval at St. Lucie Unit 1, the snubber program will meet the requirements of the ASME OM Code, Subsection ISTD, Edition 2004 with 2005 and 2006 Addenda per Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a(b)(3)(v).

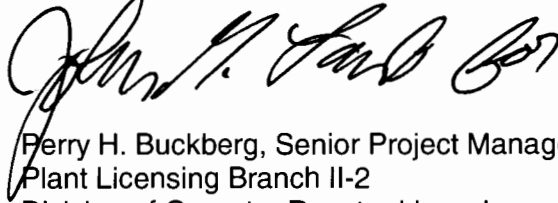
All work is complete on CAC No. MF6490. Accordingly, this CAC No. will be closed.

M. Nazar

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A copy of the Safety Evaluation is also enclosed. The 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". The signature is fluid and cursive, with a large initial "P" and "B".

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

Docket No. 50-335

Enclosures:

1. Amendment No. 232 to DPR-67
2. Safety Evaluation

cc w/encls: Distribution via Listserv



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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 232
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 (the licensee), dated July 15, 2015, as supplemented by letters dated October 23, 2015, and January 28, 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.

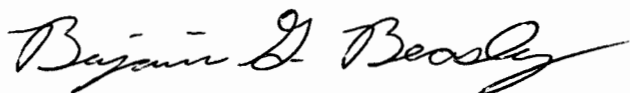
2. Accordingly, Renewed Facility Operating License No. DPR-67 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 3.B to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 232 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.

FOR THE NUCLEAR REGULATORY COMMISSION



Benjamin G. Beasley, Chief
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Operating License
and Technical Specifications

Date of Issuance: May 25, 2016

ATTACHMENT TO LICENSE AMENDMENT NO. 232
TO RENEWED FACILITY OPERATING LICENSE NO. DPR-67
DOCKET NO. 50-335

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

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

<u>Remove Pages</u>	<u>Insert Pages</u>
XV	XV
3/4 7-29	3/4 7-29
3/4 7-29a	3/4 7-29a
3/4 7-29b	3/4 7-29b
3/4 7-30	3/4 7-30
3/4 7-31	3/4 7-31
6-15h	6-15h
----	6-15i

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. 232 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.

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PLANT SYSTEMS

3/4.7.10 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.10 All safety related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

DELETED

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

DELETED

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

DELETED

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

DELETED

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.

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.

ADMINISTRATIVE CONTROLS (continued)

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.



UNITED STATES
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WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 232

TO RENEWED FACILITY OPERATING LICENSE NO. DPR-67

FLORIDA POWER AND LIGHT COMPANY

ST. LUCIE PLANT, UNIT NO. 1

DOCKET NO. 50-335

1.0 INTRODUCTION

By letter dated July 15, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A029), as supplemented by letters October 23, 2015 (ADAMS Accession No. ML15303A255), and January 28, 2016 (ADAMS Accession No. ML16053A097), Florida Power and Light Company (the licensee) requested an amendment to Renewed Operating License DPR-67 for St. Lucie Nuclear Plant (St. Lucie), Unit 1.

The proposed amendment would revise Technical Specification (TS) 3/4.7.10, "Snubbers," specifically TS Surveillance Requirement (SR) 4.7.10 to reference the newly added TSs Administrative Controls, Section 6.8.4.p, "Snubber Testing Program." This addition includes the planned revisions to the St. Lucie Unit 1 snubber inservice inspection (ISI) testing and service life monitoring programs, and removes the specific snubber inservice examination and testing requirements from TSs.

Additionally, the licensee proposed to use a later Edition and Addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition through 2006 Addenda for the remainder of the fourth 10-year ISI and testing of snubbers at St. Lucie Unit 1.

The supplements dated October 23, 2015, and January 28, 2016, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on September 15, 2015 (80 FR 55390).

2.0 BACKGROUND

A dynamic restraint (snubber) is a device designed to protect components from excess shock or sway caused by seismic disturbances or other transient forces. During normal operating conditions, the snubber allows for movement in tension and compression. When an impulse event occurs, the snubber becomes activated and acts as a restraint device. The device becomes rigid, absorbs the dynamic energy, and transfers it to the supporting structure.

Regulatory requirements for visual ISI and functional testing of snubbers have existed in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 55a since 1982. Prior to that, these requirements were imposed by plant TS SRs.

In early 1990, NRC issued the Improved Standard TSs (ISTs) for various boiling and pressurized water-cooled nuclear power plants (NUREG-1430 through NUREG-1434, Revision 4) based on the criteria in the Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 FR 39132), which was subsequently codified by changes to 10 CFR 50.36, "Technical specifications" (60 FR 36953). The ISTs allow relocating inservice examination and testing requirements of snubbers from the TSs to a plant's Technical Requirements Manual (TRM) (i.e., licensee-controlled documents). Relocating snubber ISI and testing requirements from the TS to TRM does not eliminate the need to comply with the 10 CFR 50.55a requirements.

Licensees are encouraged to upgrade their technical specifications consistent with those criteria specified in NUREG-1430 through NUREG-1434, Revision 4.

The St. Lucie fourth 10-year ISI interval began February 11, 2008, and will continue until February 10, 2018.

Currently, snubber inservice examination and testing are performed in accordance with the specific requirements of TS 3/4.7.10 and the St. Lucie Unit 1 Plant Procedures, which are based on and consistent with ASME OM Code, Subsection ISTD, Edition 2001 with 2003 Addenda. For the remainder of the fourth 10-year ISI interval, the licensee proposed to adopt the later edition of the ASME OM Code, Subsection ISTD for the snubber examination and testing requirements consistent with the ASME OM Code, Edition 2004 with 2005 and 2006 Addenda.

3.0 REGULATORY EVALUATION

It provides in 10 CFR 50.36, "Technical specifications," the regulatory requirements for the contents in a licensee's TSs. This regulation requires that the TSs include items in the five specific categories related to station operation. These categories include (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCO); (3) SRs; (4) design features; and (5) administrative controls. The regulation does not specify the particular requirements to be included in a plant's TSs. In Item 3, 10 CFR 50.36(c)(3) notes that SRs are requirements relating to test, calibration, or inspection to assure that 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.

In general, there are two classes of changes to TSs: (1) changes needed to reflect modifications to the design bases, and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required contents and preferred format of TSs over time. This amendment deals with the second class of changes. In determining the acceptability of revising TS 3/4.7.10, the NRC staff used the accumulation of generically approved guidance in NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants, Revision 4.0," dated April 2012.

Requirements for ISI of Class 1, Class 2, Class 3, Class MC, and Class CC components (including supports) are located in 10 CFR 50.55a(g). The regulation in 10 CFR 50.55a(g)(5)(ii) requires that if a revised ISI program for a facility conflicts with the TSs for that facility, the licensee shall apply to the Commission for amendment of the TSs to conform the TSs to the revised program. The licensee shall submit this application at least 6 months before the start of the period during which the provisions become applicable.

As stated in 10 CFR 50.55a(b)(3)(v), licensees are allowed the option of using the inservice examination and testing provisions for snubbers in ASME Boiler and Pressure Vessel (B&PV) Code Section XI or the ASME OM Code. However, the ASME B&PV Code Section XI option no longer exists when using the 2006 addenda and later editions and addenda of ASME B&PV Code Section XI, because these editions and addenda of Section XI do not provide ISI provisions for snubbers. When using the 2006 addenda or later editions of ASME B&PV Code Section XI, snubber examination and testing must be in accordance with the ASME OM Code, Subsections ISTA and ISTD.

4.0 TECHNICAL EVALUATION

4.1 Licensee's Proposed TS Changes and Basis Information

The proposed changes to the St. Lucie Unit 1 TSs are summarized below:

- TS SR 4.7.10 will be revised to reference a newly added Administrative Control Section 6.8.4.p "Snubber Testing Program," as follows:

TS SR 4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program.

(Note: All snubber visual inspection, functional testing and service life program requirements as described in TS SR 4.7.10 a, b, c, d, e, f, and g, which are proposed to be deleted, are not being repeated here).

- A new Section 6.8.4.p, "Snubber Testing Program," will be added to the TS Administrative Controls Section 6.8.4 "Procedures and Programs," as follows:

6.8.4.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:

- a. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- b. 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 Vessel (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 its limitations and modifications, and subject to Commission approval.
- c. The program shall, as allowed 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."
- d. 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 (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.

At St. Lucie Unit 1, during the fourth 10-year ISI interval, snubber visual inspections and functional testing are performed in accordance with the specific requirements of TS 3/4.7.10 and the snubber program document, QI-10-PR/PSL-6, which is based on ASME OM Code, Subsection ISTD, 2001 Edition with 2003 Addenda.

For the remainder of the fourth 10-year ISI interval, as permitted by 10 CFR 50.55a(b)(3)(v), the licensee proposes to adopt later Edition of the Subsection ISTD, of the ASME OM Code (i.e., 2004 Edition through 2006 addenda).

4.2 NRC Staff Evaluation of Proposed Changes

4.2.1 Relocation of Snubber Examination and Testing Requirements

Currently, inservice snubber examination and testing program at St. Lucie Unit 1 is performed in accordance with TS SR 4.7.10 and Plant Procedure QI-10-PR/PSL-6, both which are based on the ASME OM Code Subsection ISTD of 2001 Edition through 2003 Addenda, and has been found acceptable by the NRC staff for the fourth 10-year ISI interval at St. Lucie Unit 1.

In lieu of the existing TS SR 4.7.10 SRs, the licensee proposes to relocate the specific snubber examination and testing requirements from TS SR 4.7.10 to a newly added TS Section 6.8.4.p, titled "Snubber Test Program." The NRC staff has reviewed the relocation and determined that the relocation is consistent with the NRC approved ISTS in NUREG-1432, Revision 4 for Combustion Engineering Plants and is therefore acceptable.

In addition, the licensee has also developed a self-contained "Snubber Testing Program," which is based on the later OM Code requirements of 2004 Edition through 2006 Addenda. The requirements for this program are briefly summarized in TS 6.8.4.p, and the details of the snubber test program are provided in Attachment 5 of the licensee's submittal dated July 15, 2015.

4.2.2 Use of Later Edition and Addenda of the ASME OM Code for Snubber Testing Program

The NRC staff notes that the applicable "Code of Record" for St. Lucie Unit 1 fourth 10-year ISI interval is 2001 Edition through 2003 Addenda, but the licensee proposes to use later Edition and Addenda of the OM Code for remainder of the fourth 10-year ISI interval for snubber ISI and testing. Use of later Code Edition or Addenda is allowed by 10 CFR 50.55a(g)(4)(iv), provided that all related requirements of the respective Editions and Addenda are met. The NRC staff reviewed the proposed TS 6.8.4.p and the newly developed snubber test program in Attachment 5, and find them acceptable on the basis that they meet the requirements of 10 CFR 50.55a(g)(4)(iv).

Based on the above findings, the NRC staff concludes that that there is reasonable assurance that the snubber ISI and testing requirements of 10 CFR 50.55a will continue to be met, and SR 4.7.10 will continue to meet the regulatory requirements of 10 CFR 50.36(c)(3). Therefore, the NRC staff finds the proposed change acceptable.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, 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) on May 2, 2016,¹ of the proposed issuance of the amendment. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (80 FR 55390, dated September 15, 2015). Accordingly, this amendment meets 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 this amendment.

¹ The NRC staff notified the State official by telephone and by e-mail. The e-mail is in ADAMS under Accession No. ML16123A225.

7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. Bedi

Date: May 25, 2016

M. Nazar

- 2 -

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA JLamb for/

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

Docket No. 50-335

Enclosures:

1. Amendment No. 232 to DPR-67
 2. Safety Evaluation
- cc w/encls: Distribution via Listserv

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