

NRR-PMDAPem Resource

From: Buckberg, Perry
Sent: Wednesday, May 25, 2016 1:41 PM
To: Frehafer, Ken
Cc: Snyder, Mike; Catron, Steve; Kilby, Gary
Subject: Request for Additional Information - St. Lucie TSTF-505 SBPB - MF5372 & MF5373
Attachments: St Lucie FINAL TSTF-505 SBPB RAIs 5-25-16.pdf

Ken,

By letter dated December 5, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14353A016), Florida Power and Light (FPL, the licensee) submitted a License Amendment Request (LAR) regarding St. Lucie Units 1 and 2. The proposed amendment would revise Technical Specifications (TS) to Implement TS Task Force (TSTF)-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk Informed TSTF] Initiative 4b."

The U.S. Nuclear Regulatory Commission Staff reviewed the submittal and identified areas where it needs additional information and clarification to complete its review. The Request for Additional Information (RAI) is attached. The NRC requests that the licensee respond to this RAI within 60 days of this email.

Thanks,

Perry Buckberg

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REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO IMPLEMENT TSTF-505, REVISION 1,
ST LUCIE UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
(CAC NOS. MF5372 AND MF5373)

By letter dated December 5, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14353A016), Florida Power and Light (FPL, the licensee) submitted a License Amendment Request (LAR) regarding St. Lucie Units 1 and 2. The proposed amendment would revise Technical Specifications (TS) to implement TS Task Force (TSTF)-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk Informed TSTF] Initiative 4b."

Based on the review of the amendment request, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required for review of the LAR.

RAI-MF5372/73-SBPB-01

In the event of one inoperable main steam isolation valve (MSIV) in MODE 1, the current TS 3.7.1.5 requires entry into "Hot Standby" within 10 hours. The TSTF-505 LAR proposed to revise the TS to require entry into MODE 2, within 10 hours (or in accordance with RICT). As a basis for this change, the LAR indicates TSTF-505 contains incorrect structure, and in order to establish the correct structure for the St. Lucie TS, FPL offers that the proposed new action addressing two inoperable MSIVs would include a MODE 2 shutdown requirement (rather than MODE 4), and to revise the existing action for one inoperable MSIV accordingly. While these changes are consistent with the STSs, this is a deviation from the current TS and the staff is unable to locate a clear justification for this mode change. Please provide a technical justification for the proposed change from Hot Standby to MODE 2.

RAI-MF5372/73-SBPB-02

The TSTF-505 LAR is to align the St Lucie TSs with TSTF-505. For complete alignment with TSTF-505, the staff finds the following actions missing from proposed TS change:

- (1) TSTF-505 includes a [8] hours completion time for closing MSIV(s) for one or more MSIV inoperable in MODE 2 or 3, but the proposed change to TS 3.7.1.5 does not specify a time limit for closing an inoperable MSIV in Modes 2 or 3.
- (2) TSTF-505 includes a condition to verify the MSIV is closed once per 7 days, but the proposed TS is missing any action for MSIV closure verification.

Please provide an explanation why the LAR did not request adoption of the completion time and periodic MSIV closure verification.