



JUL 15 2016

L-2016-143  
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  
Response to Request for Additional Information for the Proposed 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)."
3. FPL Letter L-2016-012 dated January 21, 2016, "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 16048A248.
4. NRC Email dated June 17, 2016, "Request for Additional Information - St. Lucie FOST Sediment Cleaning SBPB - MF6488/MF6489," Adams Accession No. ML 16169A205.

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. FPL responded to the Reference 2 request for additional information (RAI) in Reference 3. In Reference 4 another request for additional information (RAI) was needed for the Staff to complete its review of the application. The attachment to this letter provides FPL's 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.

ADD  
NRR

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

Executed on **JUL 15 2016**

Sincerely,

A handwritten signature in black ink that reads "Christopher R. Costanzo". The signature is written in a cursive style with a large initial 'C'.

Christopher R. Costanzo  
Site Vice President  
St. Lucie Plant

Attachment

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

**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)  
RAI-MF6488/MF6489-SBPB-02**

**BACKGROUND:**

As indicated in the July 14, 2015, LAR, Updated Final Safety Analysis Report (UFSAR) Section 3.1.17 for both St. Lucie Unit 1 and Unit 2 discusses conformance with General Design Criterion (GDC) 17, "Electrical Power Systems". GDC 17 requires that an onsite electric power system and an offsite electric power system be provided to permit functioning of structures, systems, and components important to safety. GDC 17 also includes requirements concerning system capacity, capability, independence, redundancy, availability, testability, and reliability.

One method of meeting GDC 17 requirements, as specified in Section 9.5.4 of NUREG-0800, is a commitment to meeting RG 1.137. Compliance with RG 1.137, Rev. 1, Section C.2.f (or RG 1.137, Rev. 2, Section C.13.6) ensures that, as a minimum, the fuel oil stored in supply tanks is removed, the accumulated sediment is removed, the tanks are cleaned, and the interior is inspected at 10-year intervals.

**ISSUE:**

As indicated in the St Lucie Technical Specification (TS) BASES, the Surveillance Requirements (SR) for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.137. Tank cleaning criteria is based on Section C.2.f of RG 1.137, Rev. 1, and compliance with RG 1.137 is not addressed in St Lucie UFSAR.

St. Lucie SR 4.8.1.1.2.g was previously revised to replace the periodicity of, with, "In accordance with the Surveillance Frequency Control Program..." with the adoption of TSTF-425 related operating license amendments DPR-67 223 & NPF-16 173. With this removal of the cleaning requirement interval from the TS, it is unclear whether this cleaning requirement will remain in accordance with the Surveillance Frequency Control Program or what administrative controls will be included in UFSAR to ensure the cleaning will be performed.

**RAI:**

The NRC does not find any mention of RG 1.137 in the LAR as it relates to the SR for cleaning diesel fuel oil storage tanks. The staff requests the licensee to provide additional details on the proposed UFSAR cleaning criteria and administrative controls to ensure diesel fuel oil storage tank cleaning will satisfy RG 1.137.

**FPL Response:**

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 UFSAR. Additionally, the relocated surveillance requirement will no longer reference the Surveillance Frequency Control Program (SFCP); it will reflect the current frequency at the time the TS approval is obtained.