

From: Buckberg, Perry
To: ["Frehafer, Ken"](#)
Cc: ["Mack, Jarrett"](#); ["Snyder, Mike"](#)
Subject: Request for Additional Information - St. Lucie RPS and TS LCO LAR - MF9119/MF9120
Date: Thursday, June 01, 2017 7:43:00 AM
Attachments: [Draft RAI - St. Lucie RPS Rate of Change LCO Change \(CACs MF9119-9120\).msg](#)
[St Lucie 12 MF9119-MF9120 STSB RAI 5-31-17.pdf](#)

Ken,

By letter dated January 23, 2017, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17025A399), Florida Power & Light (FPL), submitted a license amendment request (LAR) for St. Lucie Units 1 and 2. The LAR proposes to modify the Unit 1 and Unit 2 Technical Specifications by limiting the MODE of applicability for the Reactor Protection System, Startup and Operating Rate of Change of Power - High, functional unit trip. Additionally, the proposed license amendments add new Limiting Conditions of Operation (LCO) 3.0.5 and relatedly modifies LCO 3.0.2, to provide for placing inoperable equipment under administrative control for the purpose of conducting testing required to demonstrate OPERABILITY.. The staff has identified areas where additional information is needed to complete the review.

In the attached May 18, 2017, e-mail, the staff issued a draft Request for Additional Information (RAIs) to FPL. FPL requested clarification on the draft RAI and a phone conference between FPL and the staff was held on May 31, 2017. Attached is the final RAI - RAI-MF9119/MF9120-STSB-01. The NRC requests that the licensee respond to this final RAI within 30 days of this email.

Thanks,

Perry Buckberg

Senior Project Manager

phone: (301)415-1383

perry.buckberg@nrc.gov

U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

Mail Stop O-8G9a

Washington, DC, 20555-0001

REQUEST FOR ADDITIONAL INFORMATION
ST LUCIE NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
LICENSE AMENDMENT REQUEST TO REVISE LIMITING
CONDITIONS FOR OPERATION 3.0.2 AND ADD 3.0.5
CACs MF9119 & MF9120

RAI-MF9119/MF9120-STSB-01

By letter dated January 23, 2017, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17025A399), Florida Power & Light (FPL), submitted a license amendment request (LAR) for St. Lucie Units 1 and 2. The LAR proposes to modify the Unit 1 and Unit 2 Technical Specifications by limiting the MODE of applicability for the Reactor Protection System, Startup and Operating Rate of Change of Power - High, functional unit trip. Additionally, the proposed license amendments add new Limiting Conditions of Operation (LCO) 3.0.5 and relatedly modifies LCO 3.0.2, to provide for placing inoperable equipment under administrative control for the purpose of conducting testing required to demonstrate OPERABILITY. The staff has identified areas where additional information is needed to complete the review.

The licensee's proposed new TS 3.0.5 states the following:

Equipment removed from service or declared inoperable to comply with ACTION(s) may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

The licensee's proposed revised TS LCO 3.0.2 states:

Upon discovery of a failure to meet an LCO, the Required ACTION(s) of the associated conditions shall be met, except as provided in LCO 3.0.5. If the LCO is met or is no longer applicable prior to expiration of the specified time interval(s), completion of the Required ACTION(s) is not required, unless otherwise stated.

The current Units 1 & 2 TS LCO 3.0.1 states:

Compliance with the Limiting Conditions for Operations (LCO) contained in the succeeding specifications is required during OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

The proposed new TS LCO 3.0.5 is an exception to proposed revised LCO 3.0.2 as clearly addressed in the licensee's license amendment request. However, the proposed new TS LCO 3.0.5 is also an exception to the second premise of the current LCO 3.0.1 which states: ".....except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met." Please provide the following:

1. A revised TS LCO 3.0.1 reflecting new LCO 3.0.5 as an exception to its second premise.
2. A revised new TS LCO 3.0.5 reflecting the second premise as an exception to LCO 3.0.1.

From: [Buckberg, Perry](#)
To: ["Frehafer, Ken"](#)
Cc: ["Snyder, Mike"](#)
Subject: Draft RAI - St. Lucie RPS Rate of Change / LCO Change (CACs MF9119 9120)
Date: Thursday, May 18, 2017 1:51:00 PM
Attachments: [Draft RAI - St Lucie TSs LCOs MF9119 MF9120.docx](#)

Ken,

Attached is a draft RAI regarding the St. Lucie RPS rate of change and new/revised TS LCO license amendment request that was submitted 1/23/2017.

Please review to ensure that there is no proprietary or security related information contained in the RAI, that the questions are understandable, that the regulatory basis is clear and to determine if the information was previously docketed. Please let me know by CoB 5/25/2016 if a clarification phone call is needed. If a call is not needed, please reply to let me know whether or not a 30 day response is applicable.

Thanks,

Perry Buckberg

Senior Project Manager

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U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

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DRAFT

REQUEST FOR ADDITIONAL INFORMATION
ST LUCIE NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
LICENSE AMENDMENT REQUEST TO REVISE LIMITING
CONDITIONS FOR OPERATION 3.0.2 AND ADD 3.0.5
CACs MF9119 & MF9120

Basis for the Request

The licensee is proposing to add Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.0.5 to the Applicability Section of the St. Lucie Unit 1 and Unit 2 TSs. The licensee is also proposing to revise the existing LCO 3.0.1.

The licensee's proposed new TS 3.0.5 states the following:

Equipment removed from service or declared inoperable to comply with ACTION(s) may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

The licensee's proposed revised TS LCO 3.0.2 states:

Upon discovery of a failure to meet an LCO, the Required ACTION(s) of the associated conditions shall be met, except as provided in LCO 3.0.5. If the LCO is met or is no longer applicable prior to expiration of the specified time interval(s), completion of the Required ACTION(s) is not required, unless otherwise stated.

The current Units 1 & 2TS LCO 3.0.1 states:

Compliance with the Limiting Conditions for Operations (LCO) contained in the succeeding specifications is required during OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

Draft Request for Additional Information

The proposed new TS LCO 3.0.5 is an exception to proposed revised LCO 3.0.2 as clearly addressed in the licensee's license amendment request. However, the proposed new TS LCO 3.0.5 is also an exception to the second premise of the current LCO 3.0.1

which states: “....except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.”

Please provide the following:

1. A revised TS LCO 3.0.1 reflecting new LCO 3.0.5 as an exception to its second premise.
2. A revised new TS LCO 3.0.5 reflecting the second premise as an exception to LCO 3.0.1.

DRAFT