

JUL 0 3 2017

L-2017-116 10 CFR 50.90

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington D C 20555-0001

## RE: St. Lucie Units 1 and 2 Docket Nos. 50-335 and 50-389

Renewed Facility Operating Licenses DPR-67 and NPF-16

Response to Request for Additional Information Regarding License Amendment Request to Revise the Technical Specifications (TS) for the Reactor Protection System (RPS) Power Rate-of-Change Instrumentation and Add New TS 3.0.5

#### References:

- 1. Florida Power & Light Company letter L-2017-002, License Amendment Request to Revise the Technical Specifications (TS) for the Reactor Protection System (RPS) Power Rate-of-Change Instrumentation and Add New TS 3.0.5, January 23, 2017 (ADAMS Accession No. ML 17025A399)
- NRR E-Mail Capture, 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, June 1, 2017

In Reference 1, Florida Power & Light Company (FPL) submitted license amendment requests to modify the St. Lucie Unit 1 and St. Lucie Unit 2 Technical Specifications (TS) by limiting the MODE of applicability for the Reactor Protection System (RPS), Startup and Operating Rate of Change of Power - High, functional unit trip. The proposed license amendments additionally added new Limiting Conditions for Operation (LCO) 3.0.5 and relatedly modified LCO 3.0.2, to provide for placing inoperable equipment under administrative control for the purpose of conducting testing required to demonstrate operability.

In Reference 2, the NRC determined that additional information is required to complete its review.

The enclosure to this letter provides FPL's response to the request for additional information (RAI). In addition, as discussed in the enclosure, FPL is proposing additional changes to the St. Lucie Unit 1 and St. Lucie Unit 2 TS pages that were included in Reference 1.

Attachment 1 to this enclosure provides the existing St. Lucie Unit 1 TS pages marked up to show the proposed changes. Attachment 2 to this enclosure provides the existing St. Lucie Unit 2 TS pages marked up to show the proposed changes. Attachment 3 provides the St. Lucie Unit 1 TS pages retyped (clean copy) with revision bars to identify the proposed changes. Attachment 4 provides the St. Lucie Unit 2 TS pages retyped (clean copy) with revision bars to identify the proposed changes. Attachment 5 provides the existing St. Lucie Unit 1 TS Bases pages marked up

to show the proposed changes. Attachment 6 provides the St. Lucie Unit 2 TS Bases marked up pages. The TS marked up pages, retyped (clean copy) TS pages and TS Bases marked up pages supersede the corresponding pages provided in Reference 1. The TS Bases changes are provided for information only and will be incorporated in accordance with the TS Bases Control Program upon implementation of the approved amendments.

The supplements included in this response provide additional information that clarifies the application, do not expand the scope of the application as originally noticed, and should not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register*.

This letter contains no new or revised regulatory commitments.

Should you have any questions regarding this submittal, please contact Mr. Mike Snyder, St. Lucie Licensing Manager, at (772) 467-7036.

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

Executed on JUL 0 3 2017

Sincerely,

2 for for

Dan DeBoer Site Director Florida Power & Light Company

Enclosure: FPL Response to Request for Additional Information

cc: USNRC Regional Administrator, Region II USNRC Project Manager, St. Lucie Nuclear Plant, Units 1 and 2 USNRC Senior Resident Inspector, St. Lucie Nuclear Plant, Units 1 and 2 Ms. Cindy Becker, Florida Department of Health

### Enclosure

FPL response to NRC Request for Additional Information (RAI) dated June 1, 2017 Regarding License Amendment Request to Revise the Technical Specifications (TS) for the Reactor Protection System (RPS) Power Rate-of-Change Instrumentation and Add New TS 3.0.5.

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Attachment 1 - Proposed Unit 1 Technical Specifications Pages (markup)

- Attachment 2 Proposed Unit 2 Technical Specifications Pages (markup)
- Attachment 3 Proposed Unit 1 Technical Specifications Pages (clean copy)
- Attachment 4 Proposed' Unit 2 Technical Specifications Pages (clean copy)
- Attachment 5 Proposed Unit 1 Technical Specifications Bases Pages (markup)
- Attachment 6 Proposed' Unit 2 Technical Specifications Bases Pages (markup)

### Enclosure

In an email memorandum dated June 1, 2017, the Technical Specifications Branch (STSB) of the NRC Office of Nuclear Reactor Regulation requested in RAI-MF9119/MF9120-STSB-01, additional information regarding FPL's License Amendment Request (LAR) dated January 23, 2017 for St. Lucie Unit 1 and St. Lucie Unit 2. FPL's response follows:

### 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.

### **FPL Response**

As the NRC notes in RAI-MF9119/MF9120-STSB-01 above, the second premise of TS LCO 3.0.1 states that the associated ACTION requirements shall be met upon failure to meet the Limiting Conditions for Operation (LCO). As such, FPL acknowledges that modifying TS LCO 3.0.1 to specify that the proposed TS LCO 3.0.5 is an exception to TS LCO 3.0.1 is appropriate.

However, FPL notes that the second premise of TS LCO 3.0.1 is redundant with the proposed change to TS LCO 3.0.2 specified in Reference 1 (below), which states that upon discovery of a failure to meet an LCO, the required ACTION(s) of the associated conditions shall be met except as provided in TS LCO 3.0.5. Hence, modifying TS LCO 3.0.1 similarly would further complicate TS LCO 3.0.1 with requirements and exceptions that are repeated in TS LCO 3.0.2.

FPL proposes instead to replace TS LCO 3.0.1 with the analogous LCO 3.0.1 provided in NUREG 1432, Standard Technical Specifications - Combustion Engineering Plants (Reference 2). Replacing TS LCO 3.0.1 with the LCO 3.0.1 provided in NUREG 1432 removes the redundancy with TS LCO 3.0.2 and thereby removes the need for TS LCO 3.0.1 to specify the proposed TS LCO 3.0.5 exception. The proposed change to TS LCO 3.0.1 will apply to the St. Lucie Unit 1 and the St. Lucie Unit 2 TS. However, unlike the LCO 3.0.1 provided in NUREG 1432 LCO(s) 3.0.7, 3.0.8, and 3.0.9 since the St. Lucie Unit 1 and Unit 2 TS do not contain these LCO(s).

Attachment 1 to this enclosure provides the existing St. Lucie Unit 1 TS pages marked up to show the proposed changes. Attachment 2 to this enclosure provides the existing St. Lucie Unit 2 TS pages marked up to show the proposed changes. Attachment 3 provides the St. Lucie Unit 1 TS pages retyped (clean copy) with revision bars to identify the proposed changes. Attachment 4 provides the St. Lucie Unit 2 TS pages retyped (clean copy) with revision bars to identify the proposed changes. Attachment 5 provides the existing St. Lucie Unit 1 TS Bases pages marked up to show the proposed changes. Attachment 6 provides the St. Lucie Unit 2 TS Bases marked up pages. The TS marked up pages, retyped (clean copy) TS pages and TS Bases marked up pages supersede the corresponding pages provided in Reference 1. The TS Bases changes are provided for information only and will be incorporated in accordance with the TS Bases Control Program upon implementation of the approved amendments.

### References:

- 1. Florida Power & Light Company letter L-2017-002, License Amendment Request to Revise the Technical Specifications (TS) for the Reactor Protection System (RPS) Power Rate-of-Change Instrumentation and Add New TS 3.0.5, January 23, 2017 (ADAMS Accession No. ML 17025A399)
- 2. NUREG-1432, Standard Technical Specifications Combustion Engineering Plants, Volume 1, Specifications, Revision 4.0 (Accession No. ML12102A165)

## ST. LUCIE UNIT 1 PROPOSED TECHNICAL SPECIFICATIONS PAGES (MARKUP)

(2 pages follow)

#### LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS 3/4 INSERT LCO 3.0.1 3/4.0 APPLICABILITY (see next page) LIMITING CONDITION FOR OPERATION Compliance with the Limiting Conditions for Operation (LCO) contained in-301 the succeeding specifications is required during the OPERATIONAL MODES or other INSERT LCO 3.0.2 conditions specified therein; except that upon failure to most the Limiting Conditions for Operation, the associated ACTION requirements shall be met. (see next page) 3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation (LCO) and associated ACTION requirements > are not mot within the specified time intervals. If the Limiting Conditionfor Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required. 3.0.3 When a Limiting Condition for Operation (LCO) is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit in a MODE in which specification does not apply by placing it, as applicable in: 1. At least HOT STANDBY within the next 6 hours, 2. At least HOT SHUTDOWN within the following 6 hours, and 3. At least COLD SHUTDOWN within the subsequent 24 hours. Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the LCO. Exceptions to these requirements are stated in the individual specifications. This specification is not applicable in MODES 5 or 6. 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: When the associated ACTIONS to be entered permit continued operation in the a. MODE or other specified condition in the Applicability for an unlimited period of time: b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or When an allowance is stated in the individual value, parameter, or other C. Specification. **INSERT LCO 3.0.5** This Specification shall not prevent changes in MODES or other specified conditions in (see next page) the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit. Amendment No. 40, 98, 103, 220-ST. LUCIE - UNIT 1 3/4 0-1







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Attachment 2

### ST. LUCIE UNIT 2 PROPOSED TECHNICAL SPECIFICATIONS PAGES (MARKUP)

(2 pages follow)

	3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS			EMENTS		
	3/4.0	API	PLICABILITY			INSERT LCO 3.0.1 (see next page)
	LIMITI	NG	CONDITION FOR OPERATION			
INSERT LC (see next pa	3.0.1 O 3.0.2 ige)	Cor spe spe the	npliance with the Limiting Condition cifications is required during the Of cified therein; except that upon failt associated ACTION requirements	is for Operation contai PERATIONAL MODES ure to meet the Limitin shall be met.	ined in the succe S or othor condition g Conditions for (	eding- ons- Operation,
	3.0.2	Nor Cor spo exp req	neempliance with a specification sh ndition for Operation and/or associa cified time intervals. If the Limiting iration of the specified time interval uired.	all exist when the roqu ted ACTION requirem Condition for Operatic s, completion of the A	virements of the L lents are not met on is restored pric CTION requirem	imiting- within the xr to ents is not
	3.0.3	Wh AC MO	en a Limiting Condition for Operatic TION requirements, within 1 hour, a DE in which specification does not	on is not met, except a action shall be initiated apply by placing it, as	is provided in the I to place the unit applicable, in:	associated in a
		1. 2. 3.	At least HOT STANDBY within the At least HOT SHUTDOWN within At least COLD SHUTDOWN withi	e next 6 hours, the following 6 hours, n the subsequent 24 h	and nours.	
	Where requir limits Opera specif	e corr emer as m ition. icatio	rective measures are completed that nts, the ACTION may be taken in a easured from the time of failure to Exceptions to these requirements ons.	at permit operation une ccordance with the sp neet the Limiting Con- are stated in the indiv	der the ACTION ecified time dition for ridual	
	This s	pecil	fication is not applicable in MODE 5	or 6.		
	3.0.4	Wh sha	en an LCO is not met, entry into a all only be made:	MODE or other specifi	ied condition in th	e Applicability
		a.	When the associated ACTIONS to MODE or other specified conditio time;	o be entered permit co n in the Applicability fo	ontinued operatio or an unlimited pe	n in the riod of
		b.	After performance of a risk asses components, consideration of the entering the MODE or other spec establishment of risk managemer Specification are stated in the ind	sment addressing inop results, determinatior ified condition in the A at actions, if appropriat ividual Specifications)	perable systems of the acceptabl pplicability, and te (exceptions to ; or	and lity of this
INSERT LC (see next p	CO 3.0.5 age)	5 C.	When an allowance is stated in the Specification.	ne individual value, pa	rameter, or other	
	>	-I Th the of t	is Specification shall not prevent che Applicability that are required to co the unit.	anges in MODES or c omply with ACTIONS o	other specified co or that are part of	nditions in a shutdown
	ST, L	UCIE	- UNIT 2	3/4 0-1	Amendment No. <del>170-</del>	<del>33 corrected</del> ,







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Attachment 3

# ST. LUCIE UNIT 1 PROPOSED TECHNICAL SPECIFICATIONS PAGES (Clean Copy)

(1 page follows)

#### 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

#### 3/4.0 APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

- 3.0.1 Limiting Conditions for Operation (LCO) shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2.
- 3.0.2 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.
- 3.0.3 When a Limiting Condition for Operation (LCO) is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit in a MODE in which specification does not apply by placing it, as applicable in:
  - 1. At least HOT STANDBY within the next 6 hours,
  - 2. At least HOT SHUTDOWN within the following 6 hours, and
  - 3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the LCO. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODES 5 or 6.

- 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
  - When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
  - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
  - c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

3.0.5 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.

ST. LUCIE - UNIT 1

3/4 0-1

Amendment No. 40, 98, 103, 220

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Attachment 4

### ST. LUCIE UNIT 2 PROPOSED TECHNICAL SPECIFICATIONS PAGES (Clean Copy)

(1 page follows)

#### 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

#### 3/4.0 APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

- 3.0.1 Limiting Conditions for Operation (LCO) shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2.
- 3.0.2 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.
- 3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour, action shall be initiated to place the unit in a MODE in which specification does not apply by placing it, as applicable, in:
  - 1. At least HOT STANDBY within the next 6 hours,
  - 2. At least HOT SHUTDOWN within the following 6 hours, and
  - 3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODE 5 or 6.

- 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
  - When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
  - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
  - c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

3.0.5 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.

ST. LUCIE - UNIT 2

3/4 0-1

Amendment No. 33 corrected, 170

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Attachment 5

### ST. LUCIE UNIT 1 PROPOSED TECHNICAL SPECIFICATIONS BASES PAGES (Markup)

(5 pages follow)

SECTION NO.: 3.0 & 4.0 REVISION NO.: 4	тпіе: В. ШМ АІ	TECHNICAL SPECIFICATIONS ASES ATTACHMENT 2 OF ADM-25.04 IITING CONDITIONS FOR OPERATION ND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 1	PAGE: 2 of 16
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SECTION 3 REVISIO	NO.:       TITLE:       TECHNICAL SPECIFICATIONS         .0 & 4.0       BASES ATTACHMENT 2 OF ADM-25.04         UND::       LIMITING CONDITIONS FOR OPERATION         AMO SURVEILLANCE REQUIREMENTS       ST. LUCIE UNIT 1	PAGE: 10 of 16
3/4.0	APPLICABILITY (continued)	
	BASES (continued)	
3.0.4	(continued)	
	Upon entry into a MODE or other specified condition in the Applic LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the app Conditions and Required Actions until the Condition is resolved, u is met, or until the unit is not within the Applicability of the Technic Specification.	ability with the licable ntil the LCO al
	Surveillances do not have to be performed to be performed on the inoperable equipment (or on variables outside the specified limits) by SR 4.0.4 Therefore, utilizing LCO 3.0.4 is not a violation of SR 4.0.4 for any Surveillances that have not been performed on inop equipment. However, SRs must be met to ensure OPERABILITY declaring the associated equipment OPERABLE (or variable with restoring compliance with the affected LCO.	e associated , as permitted : 4.0.1 or SR erable prior to n limits) and
3.0.5	(Add_INSERT from next page)	
ч. - С.		

9 0-1	INSERT			
3.0.5	LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g. to not comply with the applicable			
	either:			
	<ol> <li>The OPERABILITY of the equipment being returned to service or,</li> <li>The OPERABILITY of other equipment.</li> </ol>			
	The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.			
	LCO 3.0.5 specifically states that 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 the OPERABILITY of the equipment or that of other equipment. LCO 3.0.5 is limited to plant conditions where simultaneous testing and compliance with the required ACTION(s) is not possible. Hence LCO 3.0.5 may only be used if it is the only alternative to performing the required testing, regardless of whether the other alternatives present higher risk to the plant.			
	An example of demonstrating the OPERABILITY of equipment being returned to service is reopening a containment isolation valve that has been closed to comply with required ACTION(s) and must be reopened to perform the required testing.			
	An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.			
Υ.	<ol> <li>References:</li> <li>NUREG 1432, Standard Technical Specifications - Combustion Engineering Plants, Revision 4, Volume 2, Bases (ML12102A169)</li> <li>Enclosure 10: Case Study 6: ANO 1 Use of LCO 3.0.5 Meeting Summary of the January 27 &amp; 28 Meeting with NRC/TSTF (ML 090640444)</li> </ol>			

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Attachment 6

# ST. LUCIE UNIT 2 PROPOSED TECHNICAL SPECIFICATIONS BASES PAGES (Markup)

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SECTION NO.: 3.0 & 4.0 REVISION NO.:	TITLE	TECHNICAL SPECIFICATIONS BASES ATTACHMENT 2 OF ADM-25.04 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS ST. LUCIE UNIT 2	PAGE: 2 of 16
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	3.0.3		5
Add 3 0 5	3.0.4		7
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	4.0.2		13
	4.0.3		13
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Attachment 6

(5 pages follow)





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SECTION 3 REVISION	MO.: .0 & 4.0 INO: IN	PAGE: 10 of 16
3/4.0	APPLICABILITY (continued)	
	BASES (continued)	
3.0.4	(continued)	
	Upon entry into a MODE or other specified condition in the Applic LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the app Conditions and Required Actions until the Condition is resolved, u met, or until the unit is not within the Applicability of the Technical	ability with the licable Intil the LCO is Specification.
	Surveillances do not have to be performed to be performed on th inoperable equipment (or on variables outside the specified limits by SR 4.0.4 Therefore, utilizing LCO 3.0.4 is not a violation of SF 4.0.4 for any Surveillances that have not been performed on inop equipment. However, SRs must be met to ensure OPERABILITY declaring the associated equipment OPERABLE (or variable with restoring compliance with the affected LCO.	e associated ), as permitted { 4.0.1 or SR erable ′ prior to in limits) and
3.0.5	(Add INSERT from next page)	
-		

*	INSERT
3.0.5	LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g. to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate either:
•	<ol> <li>The OPERABILITY of the equipment being returned to service or,</li> <li>The OPERABILITY of other equipment.</li> </ol>
*	The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.
	LCO 3.0.5 specifically states that 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 the OPERABILITY of the equipment or that of other equipment. LCO 3.0.5 is limited to plant conditions where simultaneous testing and compliance with the required ACTION(s) is not possible. Hence LCO 3.0.5 may only be used if it is the only alternative to performing the required testing, regardless of whether the other alternatives present higher risk to the plant.
	An example of demonstrating the OPERABILITY of equipment being returned to service is reopening a containment isolation valve that has been closed to comply with required ACTION(s) and must be reopened to perform the required testing.
	An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.
	<ul> <li>References:</li> <li>NUREG 1432, Standard Technical Specifications - Combustion Engineering Plants, Revision 4, Volume 2, Bases (ML12102A169)</li> <li>Enclosure 10: Case Study 6: ANO 1 Use of LCO 3.0.5 Meeting Summary of the January 27 &amp; 28 Meeting with NRC/TSTF (ML 090640444)</li> </ul>