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 RECIP.NAME RECIPIENT AFFILIATION
 STELLO,V. OFFICE OF NUCLEAR REACTOR REGULATION

SUBJECT: REQUESTS AMEND TO APP A OF LICENSE DPR-67 RE ENGINEERED
 SAFETY FEATURES RESPONSE TIME ON CONTAINMENT ISOLATION
 FUNCTION. PROPOSED AMEND & SAFETY EVALUATION ENCL.

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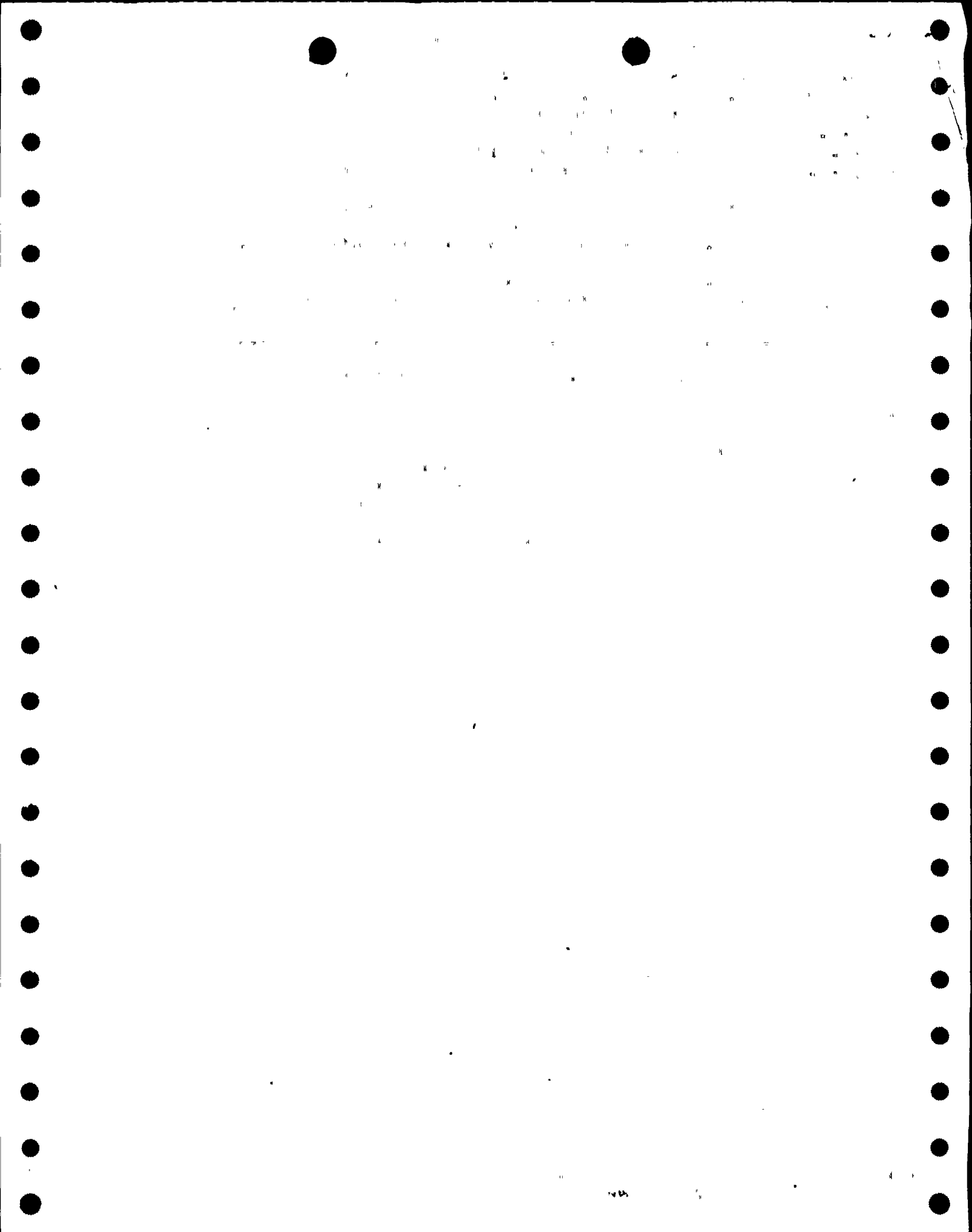
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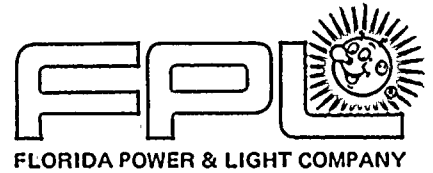
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February 21, 1979
L-79-44

Director of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

Re: St. Lucie Unit 1
Docket No. 50-335
Proposed Amendment to
Facility Operating License DPR-67

In accordance with 10 CFR 50.30, Florida Power & Light Company submits herewith three (3) signed originals and forty (40) copies of a request to amend Appendix A of Facility Operating License DPR-67.

The proposed amendment is described below and shown on the accompanying pages bearing the date of this letter in the lower right hand corner.

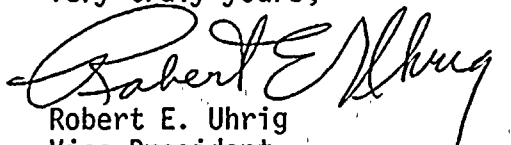
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A note is added to Table 3.3-5 to clarify the Emergency Safeguards Feature (ESF) response time requirements on the containment isolation function.

The proposed amendment has been reviewed by the St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board. They have concluded that it does not involve an unreviewed safety question.

Florida Power & Light has determined that this is a Class III amendment in accordance with 10 CFR 170.22. A check in the amount of \$4,000.00 is enclosed.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU:TCG:cf
Attachment

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire

Handwritten note:
A001
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\$4,000.00

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TABLE 3.3-5 (Continued)

ENGINEERED SAFETY FEATURES RESPONSE TIMES

<u>INITIATING SIGNAL AND FUNCTION</u>	<u>RESPONSE TIME IN SECONDS</u>
3. <u>Containment Pressure-High</u>	
a. Safety Injection (ECCS)	≤ 30.0*/19.5**
b. Containment Isolation ***	≤ 30.5*/20.5**
c. Shield Building Ventilation System	≤ 30.0*/14.0**
d. Containment Fan Coolers	≤ 30.0*/17.0**
e. Feedwater Isolation	≤ 60.0
4. <u>Containment Pressure--High-High</u>	
a. Containment Spray	≤ 30.0*/18.5**
5. <u>Containment Radiation-High</u>	
a. Containment Isolation ***	≤ 30.5*/20.5**
b. Shield Building Ventilation System	≤ 30.0*/14.0**
6. <u>Steam Generator Pressure-Low</u>	
a. Main Steam Isolation	≤ 6.9
b. Feedwater Isolation	≤ 60.0
7. <u>Refueling Water Storage Tank-Low</u>	
a. Containment Sump Recirculation	≤ 91.5

TABLE NOTATION

* Diesel generator starting and sequence loading delays included.

** Diesel generator starting and sequence loading delays not included.
Offsite power available.

***Not applicable to containment isolation valve I-MV-18-1

SAFETY EVALUATION

Re: St. Lucie Unit 1
Docket No. 50-335
Containment Isolation Valve
Closure Times

Introduction

This evaluation supports proposed changes to Technical Specification Table 3.3-5 on page 3/4 3-17. A note excluding valve I-MV-18-1 from the Emergency Safeguards Feature (ESF) response time requirements on the Containment Isolation function is added to the Table.

Discussion

The purpose of this amendment is to correct an inconsistency between the requirements of Technical Specification 3.3.2.1 and Technical Specification 3.6.3.1 with regard to containment isolation valve closure time.

Specification 3.3.2.1 establishes the Engineered Safety Feature Actuation System (ESFAS) instrumentation channel response times required for the ESFAS to be declared operable. For the containment isolation function, per Table 3.3-5; the required response time is ≤ 20.5 seconds. Under the Technical Specification definition of "engineered safety feature response time", this means that a maximum of 20.5 seconds is allowed for the time interval from when the monitored parameter (containment pressure or containment radiation) exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the containment isolation valves travel to their required positions). This implies that all containment isolation valves must close in less than 20.5 seconds, including sensor and circuit time delays.

The requirements of Specification 3.6.3.1 on containment isolation valve isolation times appear to conflict with the ESFAS requirements of Specification 3.3.2.1. Specifically, Table 3.6-2 lists an isolation time of 28 seconds for instrument air supply valve I-MV-18-1. This is inconsistent with the required response time of ≤ 20.5 seconds specified in Table 3.3-5. It is proposed that a footnote be added to Table 3.3-5 to exclude valve I-MV-18-1 from this requirement.

Evaluation

Valve I-MV-18-1 is listed on Table 6.2-16 of the FSAR as one of three valves providing for containment isolation of the instrument air system. The other two valves are check valves I-V-18-957 located inside and outside of containment. The original design basis for the containment isolation system, as stated in FSAR Section 6.2.4.1, uses check valves as automatic isolation valves outside of containment. The design basis for penetrations in Class A 1, the penetration class for the instrument air system, as stated in FSAR Section 6.2.4, uses two check valves in series, one located inside and one outside of containment. The check valves function as automatic isolation valves. Although valve I-MV-18-1 is provided with a CIS closure signal, no credit for closure is assumed in the FSAR accident analyses. The NRC staff reviewed these design bases and in the St. Lucie Unit No. 1 Safety Evaluation Report, dated November 8, 1974, in Sections 3.1 and 6.2.4, stated its determination that they met the intent of the General Design Criteria.

It should be further noted that the originally proposed plant technical specifications provided by the FSAR listed only the check valves for this penetration, which was in accordance with the system design bases. Following the adoption of the Staff's Standard Technical Specification format, I-MV-18-1 was added to the CIS isolation valve list on the basis that it received CIS signal, not on the basis that its closure is required by the FSAR accident analyses. This valve provides additional isolation capability beyond that required by the plant's safety design basis.

The check valves associated with I-MV-18-1 are seismic Class I. They are periodically leak tested, along with I-MV-18-1, in accordance with plant surveillance leak test procedures.

In summary, the plant's design basis used two check valves in series to achieve automatic containment isolation for the instrument air system penetration. Valve I-MV-18-1 provides redundant isolation for this penetration. Since the staff has reviewed this design basis and since valve I-MV-18-1 is not necessary to perform the containment isolation function, the modification of Table 3.3-5 to delete valve I-MV-18-1 from the response time requirements contained therein does not constitute an unreviewed safety question.

Conclusion

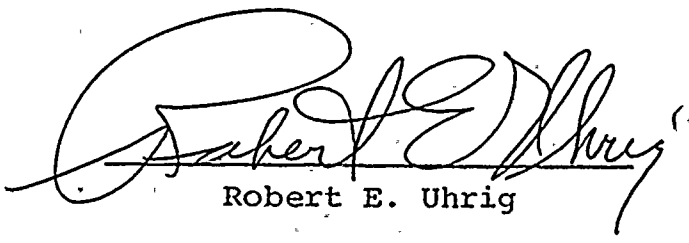
Based on these considerations, (1) the proposed change does not increase the probability or consequences of accidents or malfunctions of equipment important to safety and does not reduce the margin of safety as defined in the basis for any technical specification, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

STATE OF FLORIDA)
)
COUNTY OF DADE) ss.

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.


Robert E. Uhrig

Subscribed and sworn to before me this

21st day of February, 1979

Betty Brittain
NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: _____
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