

September 30, 1979

TECHNICAL EVALUATION REPORT  
ST. LUCIE UNIT 1  
PROPOSED TECHNICAL SPECIFICATION CHANGES  
TAC 6726  
PREPARED BY  
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## TECHNICAL EVALUATION REPORT

### ST. LUCIE UNIT 1 TECHNICAL SPECIFICATION CHANGE (Surveillance requirements for AC power sources when LCO power conditions are not met)

Docket 50-335

#### 1.0 INTRODUCTION

The objective of this review is to make recommendations on proposed changes to the St. Lucie Unit 1 Technical Specification 3.8.1.1, Action Statements "a" and "b". These changes were proposed by Florida Power and Light Company in their letter, Uhrig to Stello, dated September 8, 1978. These changes would remove the requirement for an eight-hour verification of the offsite AC power source(s) integrity and the availability of the remaining diesel-generator(s) if operation is allowed when "Limiting Conditions for Operation" AC power requirements are not met.

#### 2.0 SURVEILLANCE REQUIREMENTS

Section 50.36(c)(2), "Limiting Conditions for Operation," of 10 CFR Part 50, "Licensing of Production and Utilization Facilities," requires the Technical Specifications to include the "Limiting Conditions for Operation" (LCO) and actions required to be taken by the licensee when the LCO are not met. Power operation may be initiated and continued without restriction only when the LCO are met.

Surveillance requirements which are acceptable to the staff are included in Regulatory Guide 1.93, "Availability of Electric Power Sources." The regulatory position is:

"Whenever the Technical Specifications allow power operation to continue during a specific degradation level, such continued power operation should be contingent on (a) an immediate verification of the availability and integrity of the remaining sources, (b) reevaluation of

the availability of the remaining diesel-generator(s) at time intervals not to exceed eight hours."

AC power surveillance requirements when continued operation is allowed with less than LCO AC power sources available are contained in the "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," NUREG-0212, Action Statements "a" and "b", Technical Specification 3.8.1.1. These requirements are in agreement with Regulatory Guide 1.93.

### 3.0 DISCUSSION

The present approved St. Lucie Unit 1 Technical Specification 3.8.1.1, "Operability of AC Power Sources," Action Statements "a" and "b", are identical to the "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," NUREG-0212. The surveillance requirements agree with the staff position stipulated in Regulatory Guide 1.93.

Action Statements "a" and "b" require verification of the availability and integrity of the remaining AC power sources within one hour and once every eight hours thereafter, if power operation is continued with less than LCO required AC power sources available. FPL has requested the elimination of the eight-hour surveillance requirement.

A review was made of the St. Lucie Unit 1 docketed information for a 12-month period from May 15, 1977 to May 15, 1978. During this period there were no occurrences when the loss of a LCO power source and continued power operation required the eight-hour surveillance of the remaining sources.

### 4.0 RECOMMENDATIONS

The removal of the eight-hour surveillance of AC power sources during operation when LCO requirements are not met is not in agreement with Regulatory Guide 1.93 and the Standard Technical Specifications.

The present requirements present no hardship on the licensee since the required conditions are very infrequent. The removal of the requirements will not provide increased safety or reliability. Therefore, it is recommended that the requested Technical Specification changes be denied.

#### 5.0 REFERENCES

1. FPL letter (R. E. Uhrig) to NRC (V. Stello) dated September 8, 1978.
2. Technical Specification 3.8.1.1, Action Statements "a" and "b", St. Lucie Unit 1.
3. Technical Specification 3.8.J.1, Action Statements "a" and "b", "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," March 15, 1977, NUREG-0212.
4. Regulatory Guide 1.93, "Availability of Electric Power Sources."
5. Section 50.36(c)(2), "Limiting Conditions for Operation," of 10 CFR Part 50, "Licensing of Production and Utilization Facilities."

