

FRACTION OF MAXIMUM ALLOWABLE POWER LEVEL

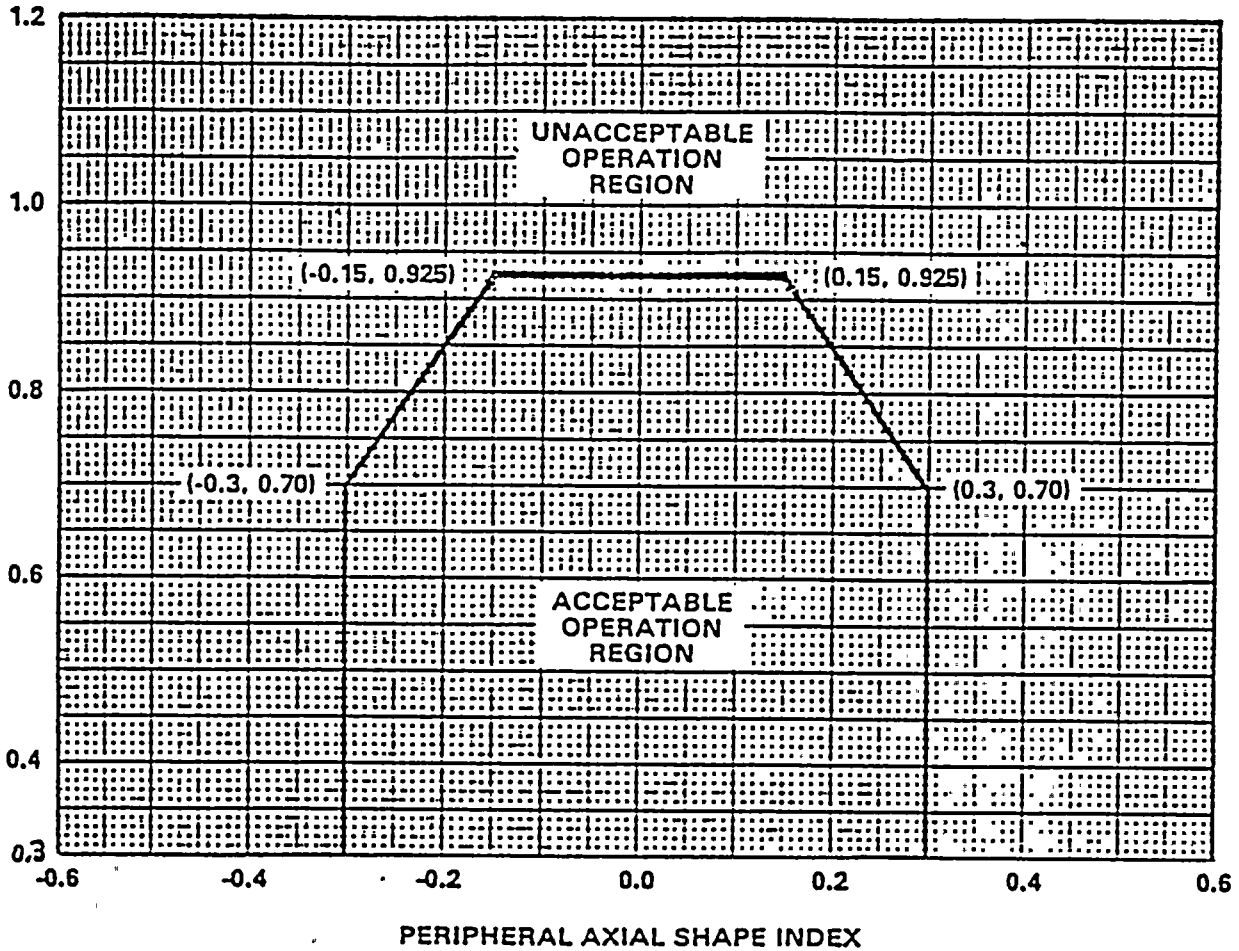


Figure 3.2-2
AXIAL SHAPE INDEX vs fraction of maximum allowable power
level per Specification 4.2.1.3

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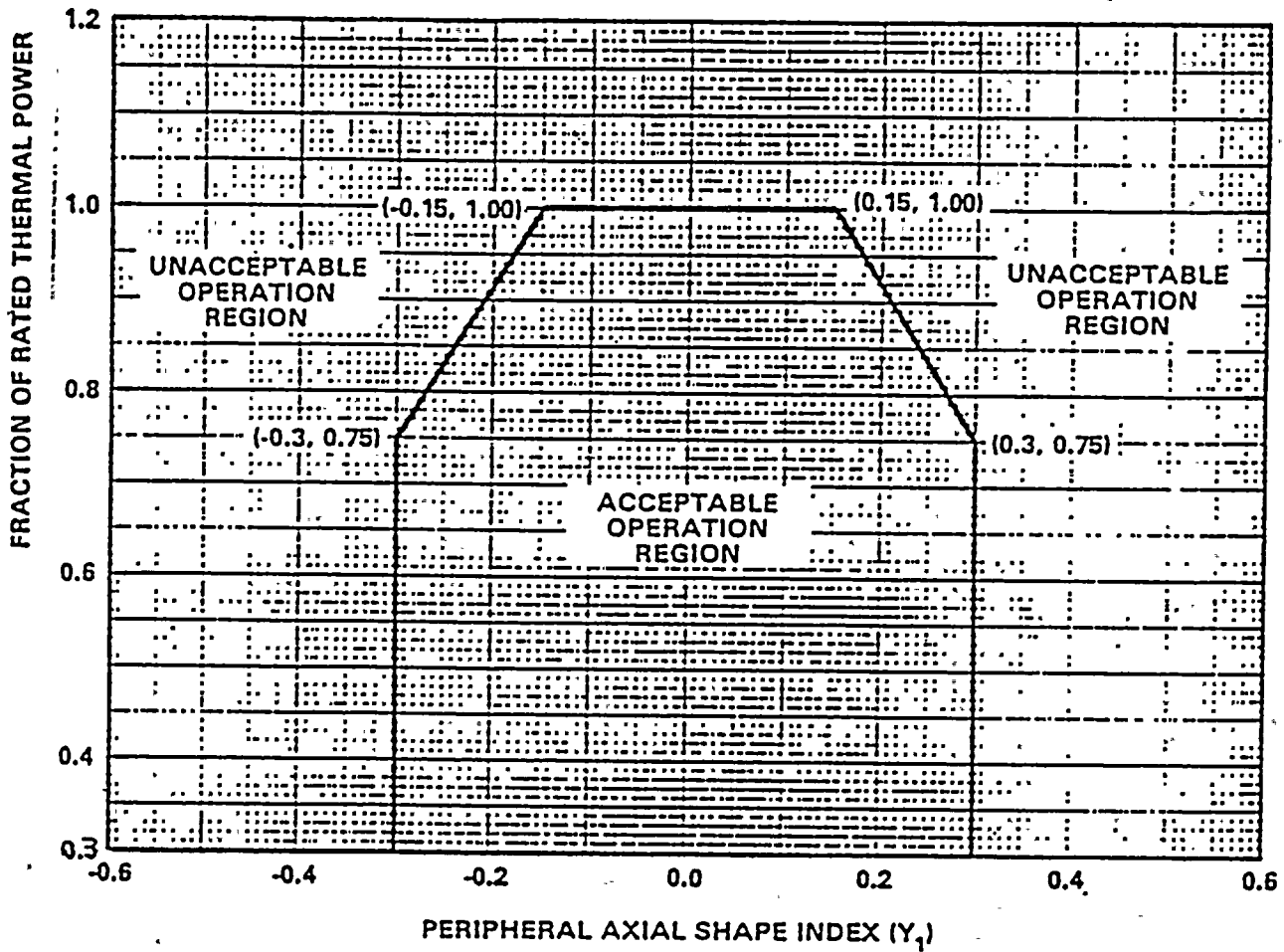


Figure 3.2-4
 AXIAL SHAPE INDEX operating limits with four reactor coolant pumps operating

Safety Evaluation to Support the Administrative
Change to St. Lucie Unit 2 DNB and LHR
Limiting Conditions for Operation (LCO's)

The purpose of the proposed change is to assure that the linear heat rate (LHR) and DNB LCO Figures 3.2-2 and 3.2-4 for St. Lucie Unit 2 correctly reflect the analytical basis used to generate them. Through an oversight, when these figures were drawn and included in the Technical Specifications, the y axis was not terminated at 30% core power. Below 30% power adequate protection is afforded by the Limiting Safety System Setpoints (LSSS).

As the core power decreases, the power peaking increases but at a slower rate than the drop in power. While St. Lucie Unit 2 setpoint generation methodology recognizes this fact, it also recognizes that low power plant operation is seldom, if ever, limiting. Hence, the beneficial aspects of the decreasing power level are often neglected to simplify operational system calculations. To assure operation is bounded by analysis assumptions, the limiting allowable axial shape index values (ASI tents) are normally calculated at the higher power levels which represent bounding conditions and dropped straight down, at a constant ASI, to 0% for the LSSS. For the LCO's, the increases in peaking factors permitted as power level decreases are such that the permissible axial offset at low power levels would increase until it is greater



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than the presently defined LSSS's. To remove this ambiguity with respect to safety analysis and the Technical Specifications, below 30% power the axial offset permitted by the LSSS and LCO's will be defined to be equivalent for St. Lucie Unit 2.

Incorporation of these corrected St. Lucie Technical Specification figures will aid St. Lucie Unit 2 in low power axial shape control. The proposed modification will change the St. Lucie Unit 2 LCO figures to the same form as the equivalent LCO figures for St. Lucie Unit 1.

Statement of No Significant Hazards
Relating to the Administrative Change to
St. Lucie Unit 2 DNB and LHR Limiting Conditions
for Operation (LCO's)

The proposed amendment will redraw Figures 3.2-2 and 3.2-4 such that the y axis will terminate at 30% core power instead of at Hot Zero Power (HZP). Between 30% core power and HZP the curve for the LPD LSSS given in Figure 2.2-2 will bound plant operation and provide adequate assurance against violation of SAFDL's. No other aspects of the LCO Figures 3.2-2 and 3.2-4 are being changed as a part of this amendment.

- 1) 10CFR50.92 (c) (1): The changes to the Figures 3.2-2 and 3.2-4 will not involve a significant increase in the probability or consequences of any accident previously analyzed for the following reason: This proposed change is purely administrative in that two figures need to be redrawn to correctly reflect the interplay between low power plant operation and the LSSS and LCO's for St. Lucie Unit 2. No changes to either input to safety analysis or postulated consequences of any accident will occur as a result of this modification.

2) 10CFR50.92 (c) (2): The change to the DNB and LHR LCO figures does not create the possibility of a new or different kind of accident from any accident previously evaluated because it does not modify the configuration of the plant or the manner in which it is operated. Since no changes to the plant or its operation are made as a result of the proposed change, there is no increase in the possibility of creating an accident of a new or different type.

3) 10CFR50.92 (c) (3): The change in St. Lucie 2 Technical Specification figures 3.2-2 and 3.2-4 does not involve a significant reduction in margin of safety due to the following: As mentioned in item 1 above, there are no changes to safety analysis input or safety analysis results due to the proposed changes. Therefore, there will be no increase in the severity of the predicted consequences of any accident and the margin of safety will not be significantly reduced.



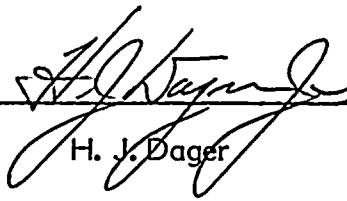
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STATE OF FLORIDA)
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COUNTY OF PALM BEACH) ss.

H. J. Dager, 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 statements made in this 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.



H. J. Dager

Subscribed and sworn to before me this
22 day of December, 1983

Cheryl Z. Francis
NOTARY PUBLIC, in and for the County
of Palm Beach, State of Florida.

My commission expires: Notary Public, State of Florida at Large
My Commission Expires October 30, 1987
Bonded thru Maynard Bonding Agency

