

Docket Nos. 50-335
and 50-389

August 28, 1986

DCR
016.

Mr. C. O. Woody
Group Vice President
Nuclear Energy
Florida Power & Light Company
P. O. Box 14000
Juno Beach, Florida 33408

Dear Mr. Woody:

SUBJECT: ADMINISTRATIVE REVIEW OF ST. LUCIE PLANT, UNITS 1 AND 2
TECHNICAL SPECIFICATIONS

During a recent administrative review of St. Lucie Plant, Units 1 and 2 Technical Specifications, several problem areas were identified. The majority of the items identified refer to outdated requirements and the basis for their inclusion in current Technical Specifications appears questionable.

Enclosed is a list for each unit referencing the TS page, the questionable item, and the staff's recommendations for disposition of each item.

Florida Power & Light Company's comments regarding these items, as well as potential amendment submittal date(s), are requested within 60 days of receipt of this letter.

The information requested herein affects fewer than 10 respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

(S)

E. G. Tourigny, Project Manager
PWR Project Directorate #8
Division of PWR Licensing-B

Enclosure:
As stated

cc w/enclosure:
See next page

Distribution: Docket File NRC & L PDRs Branch Files FMiraglia EJordan
JPartlow BGrimes OGC-Bethesda ACRS-10 PKreutzer RPerfetti ETourigny
DCrutchfield

PWR#8
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6/1/86
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PWR#8 RMP
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PWR#8 AD:DPAB
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Mr. C. O. Woody
Florida Power & Light Company

St. Lucie Plant

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Enclosure

Unit No. 1

page 3/4 3-25

The footnote for TS 3.3.3.2 addresses the LCO for the incore detection system prior to October 1, 1981. Because this footnote no longer appears applicable, its removal is recommended.

page 3/4 4-58

The footnote for TS 3.4.12 also addresses the time prior to October 1, 1981. Therefore, its removal is also recommended.

page 3/4 7-10

TS 3.7.1.6 and TS 4.7.1.6 reference Table 3.7-3 and Table 4.7-3 respectively with regard to secondary water chemistry. Both tables contain footnotes that state that sample locations, parameters and limits are to be established in approximately 6 months. However, both tables remain incomplete. Secondary water chemistry is currently addressed under Administrative Control 6.8.4c on pages 6-14 and 6-15. Therefore, TS 3.7.1.6 and TS 4.7.1.6 and their respective tables appear to be unnecessary and their removal is recommended.

pages 3/4 7-35
and 3/4 7-39a

Both Table 3.7-2a and Table 3.7-2b contain footnotes stating that snubbers may be added or removed and modifications due to high radiation areas may be made without prior license amendment provided that revisions to the Tables are included with the next license amendment request. The last amendment to Table 3.7-2a and Table 3.7-2b (Amendment No. 44) was issued in October of 1981. It is the NRC's goal that these tables be maintained in accordance with the provisions stated above. However, Generic Letter 84-13 dated May 3, 1984, states that the inclusion of snubber listings within the technical specifications is not necessary provided the snubber technical specification is modified to specify which snubbers are required to be

pages 3/4 7-35
and 3/4 7-39a (cont.)

operable. Therefore, FP&L may choose to request a license amendment to delete the tabular listings of snubbers from its technical specifications. On the other hand, FP&L may choose to request a license amendment to correct the tabular listings, if changes have been made since October, 1981.

page 6-23

TS 6.13.1 states that the Process Control Program (PCP) shall be approved by the Commission prior to implementation. The Commission approved the PCP on May 10, 1983 by letter from G. W. Knighton to R. E. Uhrig. Thus, this administrative control appears unnecessary and its removal is recommended.

TS 6.14.1 is similar to TS 6.13.1. The Commission approved this administrative control on July 28, 1983 by letter from G. W. Knighton to R. E. Uhrig. Therefore, this outdated TS should also be removed.

Unit No. 2

pages 3/4 3-25
and 3/4 3-26

The fourth footnote on each page states that monitors shall be completely installed and operable prior to exceeding 5% of rated thermal power. It would appear that these footnotes are no longer necessary and their removal is recommended.

page 3/4 4-27

Within Table 4.4-4, under Sample and Analysis Frequency 4a), the notation for microcurie/gram is incorrect. In the fourth and sixth lines mCi/gram should be corrected to μ Ci/gram.

page 3/4 4-38

TS 3.4.10 references a footnote that states that the RCS vents shall be completely installed and operable prior to exceeding 5% of rated thermal power. The current necessity of this note is questionable, and its removal is recommended.

page 3/4 7-4

TS 3.7.1.2 references a footnote that states that the Auxiliary Feedwater System automatic initiation system shall be completely installed and operable prior to initial criticality. This note is no longer necessary and its removal is recommended.

pages 3/4 7-26
and 3/4 7-27

Both pages contain tabular listings of snubbers. As stated before, it is the agency's goal to have these tables maintained in accordance with the guidance provided in the first (*) footnote on each page. These tables may have changed since Unit No. 2 was licensed. An alternative to the maintenance of these tabular listings is to delete them from the technical specifications as per guidance provided in Generic Letter 84-13.

page 3/4 7-39

TS 3.7.12 references the footnote that states that all fire rated assemblies shall be completely installed and operable prior to exceeding 5% of rated thermal power...This footnote no longer appears necessary and its removal is recommended.

page 3/4 9-5

TS 3.9.5 references the footnote that the sound powered telephone system shall be completely installed and operable prior to exceeding 5% of rated thermal power. As in the previous case, this footnote also appears unnecessary and its removal is recommended.

page 6-15

Administrative Control 6.8.4(e), Post Accident Sampling, references the footnote at the bottom of the page that states that the post-accident sampling system (PASS) shall be completely installed and operable prior to initial criticality. This footnote appears outdated and its removal is recommended.

page 6-23

TS 6.13.1 states that the Process Control Program (PCP) shall be approved by the Commission prior to implementation. The Commission approved the PCP on May 10, 1983 by letter from G. W. Knighton to R. E. Uhrig. Therefore, this technical specification would appear to be unnecessary and its removal is recommended.

TS 6.14.1 states that the Offsite Dose Calculation Manual (ODCM) shall be approved by the Commission prior to implementation. The Commission approved the ODCM on July 28, 1983 by letter from G. W. Knighton to R. E. Uhrig. Therefore, the removal of this apparently outdated technical specification is recommended.