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SUBJECT: Application for amend to License NPF-16, revising Tech Specs to incorporate revised P/T limit & results of LTOP analysis.

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L-88-236
10 CFR 50.90

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

Gentlemen:

Re: St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment
P/T Limits and LTOP Analysis

By letter L-87-482, dated November 27, 1987, Florida Power & Light Company (FPL) submitted a proposed license amendment for St. Lucie Unit 2 with approval requested prior to the plant reaching 4.0 EFPY (now projected to occur on or about May 23, 1988), since the P/T curves currently included in the Technical Specifications expire at that time.

Attachment 5 to the proposed license amendment described the methodology used by FPL in calculating the adjusted reference temperature (ART) values used in generating the P/T limits out to 32 EFPY. The attachment also demonstrated that these ART values are sufficiently conservative relative to the temperatures calculated according to the guidelines of draft Regulatory Guide 1.99, Revision 2. FPL, in fact, employed the guidelines of draft Regulatory Guide 1.99, Revision 2 in calculating ARTs for use in generating P/T limits for St. Lucie Unit 2. An exception to the Regulatory Guide procedures in FPL's approach was the use of calculated fluence values at 1/4T and 3/4T locations rather than the draft Regulatory Guide 1.99, Revision 2 correlation based on surface fluence. The net result was ART values at the 3/4T location that were not in agreement with those ART values calculated using the draft Regulatory Guide procedures (i.e. more than 5% difference).

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FPL's position on the adjusted reference temperatures used in generating P/T limits for St. Lucie Unit 2 is that the values calculated are sufficiently conservative with respect to the guidelines of draft Regulatory Guide 1.99, Revision 2. This position is based on the comparison of ART values provided for St. Lucie Unit 2 with ART values determined within the guidelines of the draft Regulatory Guide and considering the current position of the NRC with respect to the established credibility of the surveillance data.

On March 24, 1988, FPL, Combustion Engineering (CE) (the St. Lucie Unit 2 Nuclear Steam Supply System vendor and P/T-LTOP analysis contractor) and the NRC held a conference call to discuss FPL's application. At that time, the NRC Staff stated that it did not accept FPL's partial application of the draft Regulatory Guide Revision 2 methodology. The NRC gave FPL two options: 1) accept NRC's calculated 6 EFPY curve (which correlates with FPL's proposed 10 EFPY curve) or 2) submit a new curve using the draft Regulatory Guide 1.99, Revision 2 methodology verbatim.

In a telephone conversation with the Staff on April 12, 1988, FPL requested that the NRC Staff continue its technical review of FPL's ART methodology. The Staff agreed to continue the review without a re-application by FPL. The Staff stated that it would complete the ART methodology review prior to St. Lucie Unit 2 reaching 6 EFPY. In a telephone conversation with the NRC Staff on April 25, 1988 and by letter L-88-201 dated May 4, 1988, FPL, while not committing to the methodology presented in draft Regulatory Guide 1.99 Rev. 2, accepted P/T curves limited to 6 EFPY.

The NRC Staff informed FPL on May 18, 1988 that the proposed license amendment could not be issued with the P/T limit curves limited to 6 EFPY instead of 10 EFPY. The NRC Staff stated that FPL would need to reapply for the 6 EFPY curves since the Federal Register notice ("Sholly") related to this issue had stated that 10 EFPY curves were being requested.

As detailed above, FPL and the NRC have discussed this issue at length over the last six months and have resolved all technical concerns. Issuance of the amendment is now being precluded by purely administrative requirements.

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To resolve this impasse, and, in accordance with 10 CFR 50.90, FPL requests that Appendix A of Facility Operating License NPF-16, St. Lucie Unit 2 Technical Specifications, be amended, to incorporate revised Pressure/Temperature (P/T) limits and the results of a revised Low Temperature Overpressure Protection (LTOP) analysis. New P/T limit curves are applicable for operation up to six (6) Effective Full Power Years (EFPY).

The NRC is requested to process the proposed license amendment by any means permissible under 10 CFR 50.91 (short of emergency situation) which the staff deems prudent. FPL will administratively implement the proposed 6 EFPY curve and LTOP alignments, in the interim, until NRC approval of this proposed license amendment.


It has been determined that the proposed amendment does not involve a significant hazards consideration pursuant to 10 CFR 50.92. A description of the amendment request, the basis for the no significant hazards consideration determination, and the proposed technical specification pages were provided in the original application.

In accordance with 10 CFR 50.91(b)(1), a copy of this proposed license amendment is being forwarded to the State Designee of the State of Florida.

In accordance with 10 CFR 170.12(c), FPL Check No. 7873 for \$150 is attached.

Should there be any questions on this request, please contact us.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/EJW/gp
Attachment

cc: Dr. J. Nelson Grace, Regional Administrator,
Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant
Mr. Lyle Jerrett, Florida Department of Health and
Rehabilitative Services

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