



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 94
License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company, (the licensee) dated January 22, 1988, as supplemented April 6, 1988, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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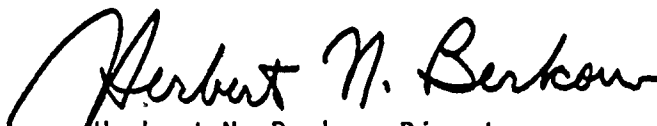
2. Accordingly, Facility Operating License No. DPR-67 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.(2) to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 94, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 6, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 94

TO FACILITY OPERATING LICENSE NO. DPR-67

DOCKET NO. 50-335

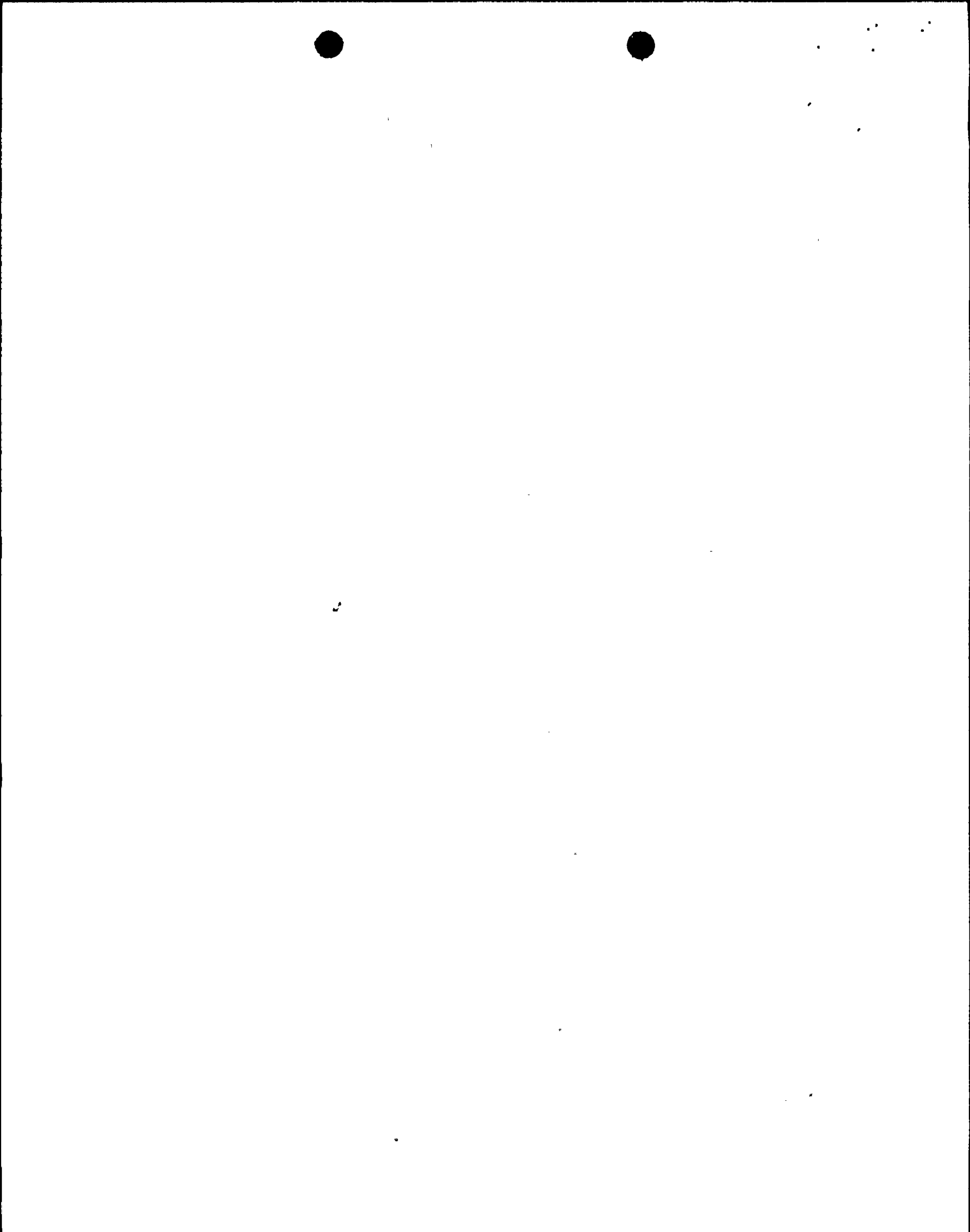
Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

Remove Pages

3/4 1-8
3/4 1-9
3/4 1-10
3/4 1-11
3/4 1-16
Figure 3.1-1
3/4 1-18
3/4 1-19
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B3/4 1-2
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Insert Pages

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REACTIVITY CONTROL SYSTEMS

MINIMUM TEMPERATURE FOR CRITICALITY

LIMITING CONDITION FOR OPERATION

3.1.1.5 The Reactor Coolant System lowest operating loop temperature (T_{avg}) shall be $\geq 515^{\circ}\text{F}$ when the reactor is critical.

APPLICABILITY: MODES 1 and 2#.

ACTION:

With a Reactor Coolant System operating loop temperature (T_{avg}) $< 515^{\circ}\text{F}$, restore T_{avg} to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes.

SURVEILLANCE REQUIREMENTS

4.1.1.5 The Reactor Coolant System temperature (T_{avg}) shall be determined to be $\geq 515^{\circ}\text{F}$.

- a. Within 15 minutes prior to achieving reactor criticality, and
- b. At least once per 30 minutes when the reactor is critical and the Reactor Coolant System temperature (T_{avg}) is $< 525^{\circ}\text{F}$.

With $K_{eff} \geq 1.0$.

REACTIVITY CONTROL SYSTEMS

3/4.1.2 BORATION SYSTEMS

FLOW PATHS - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.1 As a minimum, one of the following boron injection flow paths shall be OPERABLE:

- a. A flow path from the boric acid makeup tank via either a boric acid pump or a gravity feed connection and any charging pump to the Reactor Coolant System if only the boric acid makeup tank in Specification 3.1.2.7a is OPERABLE, or
- b. The flow path from the refueling water tank via either a charging pump or a high pressure safety injection pump* to the Reactor Coolant System if only the refueling water tank in Specification 3.1.2.7b is OPERABLE.

APPLICABILITY: MODES 5 and 6.

ACTION:

With none of the above flow paths OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes until at least one injection path is restored to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.1.2.1 At least one of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

*The flow path from the RWT to the RCS via a single HPSI pump shall only be established if: (a) the RCS pressure boundary does not exist, or (b) no charging pumps are operable. In this case all charging pumps shall be disabled, and heatup and cooldown rates shall be limited in accordance with Fig. 3.1-1b.

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS

- b. At least once per 24 hours, when the Reactor Auxiliary Building air temperature is less than 55°F, by verifying that the Boric Acid Makeup Tank solution temperature is greater than 55°F, when the flowpath from the Boric Acid Makeup Tank is required to be OPERABLE.

REACTIVITY CONTROL SYSTEMS

FLOW PATHS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.2 At least two of the following three boron injection flow paths shall be OPERABLE:

- a. One flow path from the boric acid makeup tank(s) with the tank meeting Specification 3.1.2.8 part a) or b), via a boric acid makeup pump through a charging pump to the Reactor Coolant System.
- b. One flow path from the boric acid makeup tank(s) with the tank meeting Specification 3.1.2.8 part a) or b), via a gravity feed valve through a charging pump to the Reactor Coolant System.
- c. The flow path from the refueling water storage tank via a charging pump to the Reactor Coolant System.

OR

At least two of the following three boron injection flow paths shall be OPERABLE:

- a. One flow path from each boric acid makeup tank with the combined tank contents meeting Specification 3.1.2.8 c), via both boric acid makeup pumps through a charging pump to the Reactor Coolant System.
- b. One flow path from each boric acid makeup tank with the combined tank contents meeting Specification 3.1.2.8 c), via both gravity feed valves through a charging pump to the Reactor Coolant System.
- c. The flow path from the refueling water storage tank, via a charging pump to the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one of the above required boron injection flow paths to the Reactor Coolant System OPERABLE, restore at least two boron injection flow paths to the Reactor Coolant System to OPERABLE status within 72 hours or make the reactor subcritical within the next 2 hours and borate to a SHUTDOWN MARGIN equivalent to at least 2000 pcm at 200°F; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS

4.1.2.2 At least two of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- b.. At least once per 18 months during shutdown by verifying that each automatic valve in the flow path actuates to its correct position on a Safety Injection Actuation Signal.
- c. At least once per 24 hours when the Reactor Auxiliary Building air temperature is below 55°F by verifying that the solution temperature of the Boric Acid Makeup Tank(s) is above 55°F.

REACTIVITY CONTROL SYSTEMS

BORIC ACID PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 At least the boric acid pump(s) in the boron injection flow path(s) required OPERABLE pursuant to Specification 3.1.2.2a shall be OPERABLE if the flow path through the boric acid pump in Specification 3.1.2.2a is OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one boric acid pump required for the boron injection flow path(s) pursuant to Specification 3.1.2.2a inoperable, restore the boric acid pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.6 The above required boric acid pump(s) shall be demonstrated OPERABLE by verifying that on recirculation flow, the pump develops a discharge pressure of ≥ 75 psig when tested pursuant to Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.7 As a minimum, one of the following borated water sources shall be OPERABLE:

- a. One boric acid makeup tank with a minimum borated water volume of 3650 gallons of 2.5 to 3.5 weight percent boric acid (4371 to 6119 ppm boron).
- b. The refueling water tank with:
 1. A minimum contained volume of 125,000 gallons,
 2. A minimum boron concentration of 1720 ppm, and
 3. A minimum solution temperature of 40°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water sources OPERABLE, suspend all operations involving positive reactivity changes until at least one borated water source is restored to OPERABLE status.

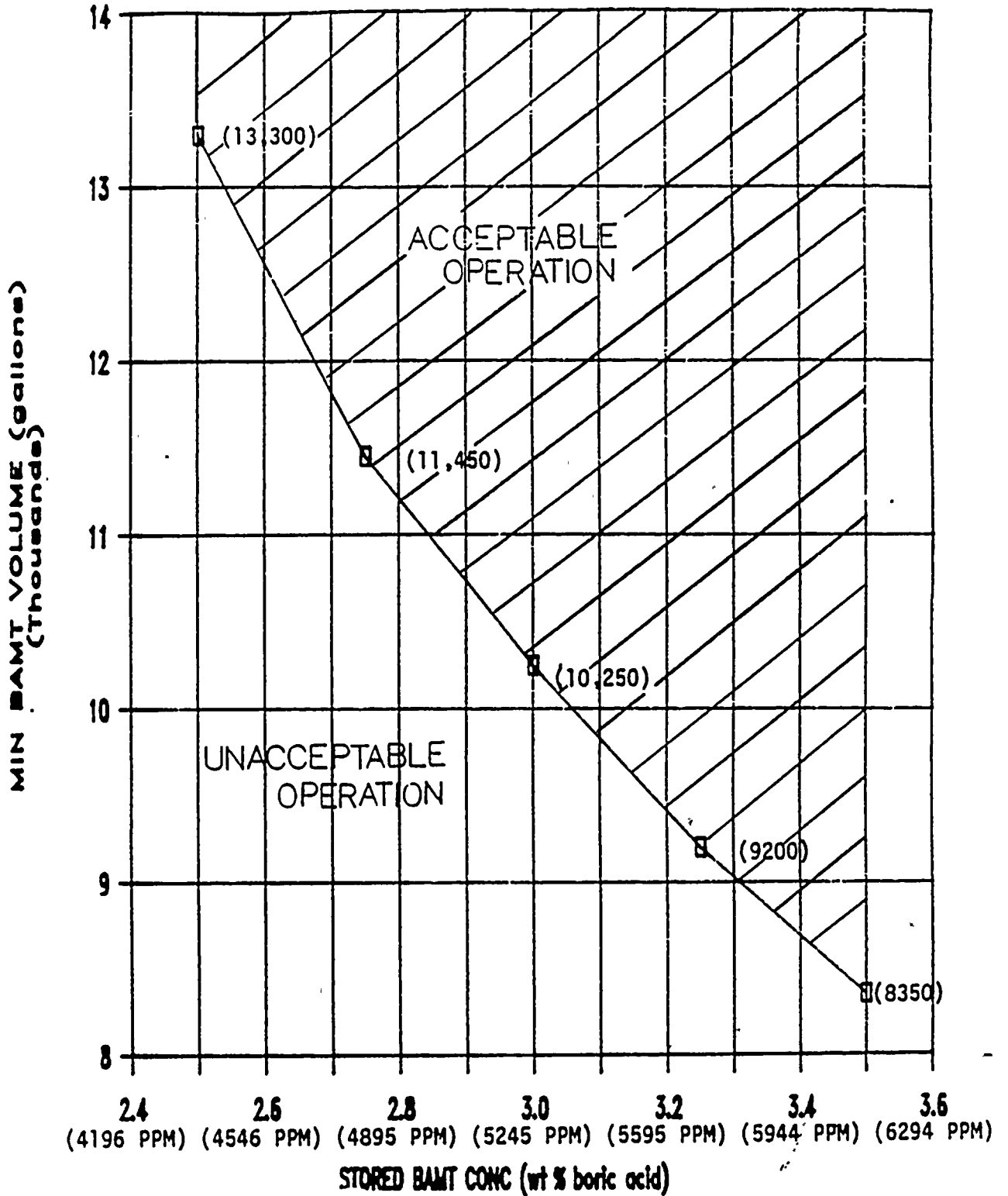
SURVEILLANCE REQUIREMENTS

4.1.2.7 The above required borated water source shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration of the water,
 2. Verifying the water level of the tank, and
- b. At least once per 24 hours by verifying the RWT temperature when it is the source of borated water and the site ambient air temperature is < 40°F.
- c. At least once per 24 hours when the Reactor Auxiliary Building air temperature is less than 55°F by verifying that the Boric Acid Makeup Tank solution temperature is greater than 55°F when that Boric Acid Makeup Tank is required to be OPERABLE.

FIGURE 3.1-1 ST.LUCIE 1 MIN BAMT VOLUME

VS STORED BAMT CONCENTRATION



REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 At least two of the following four borated water sources shall be OPERABLE:

- a. Boric Acid Makeup Tank 1A in accordance with Figure 3.1-1 and in the range of 3.2 to 3.5 weight percent boric acid (5595 to 6119 ppm boron).
- b. Boric Acid Makeup Tank 1B in accordance with Figure 3.1-1 and in the range of 3.2 to 3.5 weight percent boric acid (5595 to 6119 ppm boron).
- c. Boric Acid Makeup Tanks 1A and 1B with a minimum combined contained borated water volume in accordance with Figure 3.1-1.
- d. The refueling water tank with:
 1. A minimum contained volume of 401,800 gallons of water,
 2. A minimum boron concentration of 1720 ppm,
 3. A maximum solution temperature of 100°F,
 4. A minimum solution temperature of 55°F when in MODES 1 and 2, and
 5. A minimum solution temperature of 40°F when in MODES 3 and 4.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one borated water source OPERABLE, restore at least two borated water sources to OPERABLE status within 72 hours or make the reactor subcritical within the next 2 hours and borate to a SHUTDOWN MARGIN equivalent to at least 200 pcm at 200°F; restore at least two borated water sources to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.8 At least two borated water sources shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration in each water source,

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying the water level in each water source.
 - b. At least once per 24 hours by verifying the RWT temperature.
 - c. At least once per 24 hours by verifying that the Boric Acid Makeup Tank solution temperature is greater than 55°F when the Reactor Auxiliary Building air temperature is below 55°F.

REACTIVITY CONTROL SYSTEMS

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

FULL LENGTH CEA POSITION

LIMITING CONDITION FOR OPERATION

3.1.3.1 The CEA Block Circuit and all full length (shutdown and regulating) CEAs shall be OPERABLE with each CEA of a given group positioned within 7.5 inches (indicated position) of all other CEAs in its group.

APPLICABILITY: MODES 1* and 2*.

ACTION:

- a. With one or more full length CEAs inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in HOT STANDBY within 6 hours.
- b. With the CEA Block Circuit inoperable, within 6 hours either:
 1. With one CEA position indicator per group inoperable, take action per Specification 3.1.3.3, or
 2. With the group overlap and/or sequencing interlocks inoperable, maintain CEAs in groups 3, 4, 5 and 6 fully withdrawn and withdraw the CEAs in group 7 to less than 5% insertion and place and maintain the CEA drive system mode switch in either the "Manual" or "Off" position, or
 3. Be in at least HOT STANDBY.
- c. With one full length CEA inoperable due to causes other than addressed by Action a above, but within its above specified alignment requirements and either fully withdrawn or within the long term steady state insertion limits if in CEA group 7, operation in MODES 1 and 2 may continue.
- d. With one or more full length CEAs misaligned from any other CEAs in its group by more than 7.5 inches but less than 15 inches, operation in MODES 1 and 2 may continue, provided that within one hour the misaligned CEA(s) is either:
 1. Restored to OPERABLE status within its above specified alignment requirements, or

*See Special Test Exceptions 3.10.2 and 3.10.5.

CONTAINMENT SYSTEMS

SPRAY ADDITIVE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.2 The spray additive system shall be OPERABLE with:

- a. A spray additive tank containing a volume of between 4010 and 5000 gallons of between 28.5 and 30.5% by weight NaOH solution, and
- b. Two spray additive eductors each capable of adding NaOH solution from the chemical additive tank to a containment spray system pump flow.

APPLICABILITY: MODES 1, 2 and 3.*

ACTION:

With the spray additive system inoperable, restore the system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the spray additive system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.2 The spray additive system shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- b. At least once per 6 months by:
 1. Verifying the contained solution volume in the tank, and
 2. Verifying the concentration of the NaOH solution by chemical analysis.
- c. At least once per 18 months, during shutdown, by verifying that each automatic valve in the flow path actuates to its correct position on a CSAS test signal.

*Applicable when pressurizer pressure is \geq 1750 psia.

3/4.1 REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1 BORATION CONTROL

3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN

A sufficient SHUTDOWN MARGIN ensures that 1) the reactor can be made subcritical from all operating conditions, 2) the reactivity transients associated with postulated accident conditions are controllable within acceptable limits, and 3) the reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

SHUTDOWN MARGIN requirements vary throughout core life as a function of fuel depletion, RCS boron concentration, and RCS T_{avg} . The most restrictive condition occurs at EOL, with T_{avg} at no load operating temperature, and is associated with a postulated steam line break accident and resulting uncontrolled RCS cooldown. In the analysis of this accident, a minimum SHUTDOWN MARGIN of 3600 pcm is required to control the reactivity transient. Accordingly, the SHUTDOWN MARGIN required by Specification 3.1.1.1 is based upon this limiting condition and is consistent with FSAR accident analysis assumptions. For earlier periods during the fuel cycle, this value is conservative. With $T_{avg} \leq 200^{\circ}\text{F}$, the reactivity transient resulting from a boron dilution event with a partially drained Reactor Coolant System requires a 2000 pcm SHUTDOWN MARGIN and restrictions on charging pump operation to provide adequate protection. A 2000 pcm SHUTDOWN MARGIN is 1000 pcm conservative for Mode 5 operation with total RCS volume present, however LCO 3.1.1.2 is written conservatively for simplicity.

3/4.1.1.3 BORON DILUTION AND ADDITION

A minimum flow rate of at least 3000 GPM provides adequate mixing, prevents stratification and ensures that reactivity changes will be gradual during boron concentration changes in the Reactor Coolant System. A flow rate of at least 3000 GPM will circulate an equivalent Reactor Coolant System volume of 11,400 cubic feet in approximately 26 minutes. The reactivity change rate associated with boron concentration changes will be within the capability for operator recognition and control.

3/4.1.1.4 MODERATOR TEMPERATURE COEFFICIENT (MTC)

The limiting values assumed for the MTC used in the accident and transient analyses were +7 pcm/ $^{\circ}\text{F}$ for THERMAL POWER levels < 70% of RATED THERMAL POWER, +2 pcm/ $^{\circ}\text{F}$ for THERMAL POWER levels > 70% of RATED THERMAL and -28 pcm/ $^{\circ}\text{F}$ at RATED THERMAL POWER. Therefore, these limiting values are included in this specification. Determination of MTC at the specified conditions ensures that the maximum positive and/or negative values of the MTC will not exceed the limiting values.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1.5 MINIMUM TEMPERATURE FOR CRITICALITY

The MTC is expected to be slightly negative at operating conditions. However, at the beginning of the fuel cycle, the MTC may be slightly positive at operating conditions and since it will become more positive at lower temperatures, this specification is provided to restrict reactor operation when T_{avg} is significantly below the normal operating temperature.

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid pumps, and 5) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from all operating conditions of 2000 pcm after xenon decay and cooldown to 200°F. The maximum boration capability requirement occurs at EOL from full power equilibrium xenon conditions. This requirement can be met for a range of boric acid concentrations in the Boric Acid Makeup Tanks (BAMTs) and Refueling Water Tank (RWT). This range is bounded by 8350 gallons of 3.5 weight percent (6119 ppm boron) boric acid from the BAMTs and 14,000 gallons of 1720 ppm borated water from the RWT to 13,300 gallons of 2.5 weight percent (4371 ppm boron) boric acid from the BAMTs and 9,000 gallons of 1720 ppm borated water from the RWT. A minimum of 45,000 gallons of 1720 ppm boron is required from the RWT if it is to be used to borate the RCS alone.

The requirements for a minimum contained volume of 401,800 gallons of borated water in the refueling water tank ensures the capability for borating the RCS to the desired level. The specified quantity of borated water is consistent with the ECCS requirements of Specification 3.5.4. Therefore, the larger volume of borated water is specified here too.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity change in the event the single injection system becomes inoperable.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.2 BORATION SYSTEMS (Continued)

The boron addition capability after the plant has been placed in MODES 5 and 6 requires either 3650 gallons of 2.5 to 3.5 weight percent boric acid solution (4371 to 6119 ppm boron) from the boric acid tanks or 11,900 gallons of 1720 ppm borated water from the refueling water tank to makeup for contraction of the primary coolant that could occur if the temperature is lowered from 200°F to 140°F.

The restrictions associated with the establishing of the flow path from the RWT to the RCS via a single HPSI pump provide assurance that Appendix G pressure/temperature limits will not be exceeded in the case of any inadvertent pressure transient due to a mass addition to the RCS.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) the potential effects of a CEA ejection accident are limited to acceptable levels.

The ACTION statements which permit limited variations from the basic requirements are accompanied by additional restrictions which ensure that the original criteria are met.

The ACTION statements applicable to an immovable or untrippable CEA and to a large misalignment (≥ 15 inches) of two or more CEAs, require a prompt shutdown of the reactor since either of these conditions may be indicative of a possible loss of mechanical functional capability of the CEAs and in the event of a stuck or untrippable CEA, the loss of SHUTDOWN MARGIN.

For small misalignments (< 15 inches) of the CEAs, there is 1) a small degradation in the peaking factors relative to those assumed in generating LCOs and LSSS setpoints for DNBR and linear heat rate, 2) a small effect on the time dependent long term power distributions relative to those used in generating LCOs and LSSS setpoints for DNBR and linear heat rate, 3) a small effect on the available SHUTDOWN MARGIN, and 4) a small effect on the ejected CEA worth used in the safety analysis. Therefore, the ACTION statement associated with the small misalignment of a CEA permits a one hour time interval during which attempts may be made to restore the CEA to within its alignment requirements prior to initiating a reduction in THERMAL POWER. The one hour time limit is sufficient to (1) identify causes of a misaligned CEA, (2) take appropriate corrective action to realign the CEAs, and (3) minimize the effects of xenon redistribution.

Overpower margin is provided to protect the core in the event of a large misalignment (≥ 15 inches) of a CEA. However, this misalignment would cause distortion of the core power distribution. This distribution may, in turn, have a significant effect on (1) the available SHUTDOWN MARGIN, (2) the time-dependent long-term power distributions relative to those used in generating LCOs and LSSS setpoints, and (3) the ejected CEA worth used in the safety analysis. Therefore, the ACTION statement associated with the large misalignment of the CEA requires a prompt realignment of the misaligned CEA.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.3 MOVABLE CONTROL ASSEMBLIES (Continued)

The ACTION statements applicable to misaligned or inoperable CEAs include requirements to align the OPERABLE CEAs in a given group with the inoperable CEA. Conformance with these alignment requirements brings the core, within a short period of time, to a configuration consistent with that assumed in generating LCO and LSSS setpoints. However, extended operation with CEAs significantly inserted in the core may lead to perturbations in 1) local burnup, 2) peaking factors, and 3) available shutdown margin which are more adverse than the conditions assumed to exist in the safety analyses and LCO and LSSS setpoints determination. Therefore, time limits have been imposed on operation with inoperable CEAs to preclude such adverse conditions from developing.

The requirement to reduce power in certain time limits, depending upon the previous F_r^t , is to eliminate a potential nonconservatism for situations when a CEA has been declared inoperable. A worst case analysis has shown that a DNBR SAFDL violation may occur during the second hour after the CEA misalignment if this requirement is not met. This potential DNBR SAFDL violation is eliminated by limiting the time operation is permitted at FULL POWER before power reductions are required. These reductions will be necessary once the deviated CEA has been declared inoperable. The time allowed to continue operation at a reduced power level can be permitted for the following reasons:

1. The margin calculations that support the Technical Specifications are based on a steady-state radial peak of $F_r^t > 1.70$.
2. When the actual $F_r^t \leq 1.70$, significant additional margin exists.
3. This additional margin can be credited to offset the increase in F_r^t with time that can occur following a CEA misalignment.
4. This increase in F_r^t is caused by xenon redistribution.
5. The present analysis can support allowing a misalignment to exist for up to 60 minutes without correction, if the initial $F_r^t \leq 1.67$.

Operability of the CEA position indicators (Specification 3.1.3.3) is required to determine CEA positions and thereby ensure compliance with the CEA alignment and insertion limits and ensures proper operation of the rod block circuit. The CEA "Full In" and "Full Out" limits provide an additional independent means for determining the CEA positions when the CEAs are at either their fully inserted or fully withdrawn positions. Therefore, the ACTION statements applicable to inoperable CEA position indicators permit continued operations when the positions of CEAs with inoperable position indicators can be verified by the "Full In" or "Full Out" limits.