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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 108 AND 48

TO FACILITY OPERATING LICENSE NOS. DPR-67 AND NPF-16

FLORIDA POWER & LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

1.0 INTRODUCTION

By application dated November 17, 1989, Florida Power & Light Company (FPL, the licensee) requested various changes to the Technical Specifications (TS) for the St. Lucie Plant, Unit Nos. 1 and 2. The licensee proposed to make administrative changes and achieve consistency throughout the TS by removing outdated material, making minor text changes, correcting errors and implementing the line-item improvements recommended by Generic Letter 89-14, "Removal of the 3.25 Limit on Extending Surveillance Intervals."

2.0 EVALUATION

St. Lucie Unit 1 TS only

a) On pages 3/4 3-39 and 3/4 3-40, Table 3.3-10, Fire Detection Instrumentation, the licensee proposed to change the numerical designation of fire zones. The proposed changes reflect human factors improvements to achieve consistency in labeling in order to reduce the wrong unit/wrong train/wrong component type of errors. Since the changes do not alter the boundaries of fire zones but only their designation, the staff finds them acceptable.

b) On page 3/4 4-5, Surveillance Requirement 4.4.5.2, Steam Generator Tube Sample Selection and Inspection, the licensee proposed to delete the following sentence: "Steam generator tubes shall be examined in accordance with Appendix IV of the ASME Boiler and Pressure Vessel Code - Section XI - "Inservice Inspection of Nuclear Power Plant Components, 1974 Edition and Addenda through Summer 1976." This requirement is inconsistent with Surveillance Requirement 4.0.5, which was revised by Amendment No. 90, issued March 7, 1988. The revised Surveillance Requirement 4.0.5 states that surveillances be performed in accordance with ASME Section XI, as required by 10 CFR Part 50, Section 50.55a(g), which means that the applicable code is the latest approved revision of the ASME Code in effect at the time of a new 10-year Inservice Inspection Interval, i.e. 1983 Edition, Summer 1983 Addenda.

Amendment No. 90 revised several other TS Surveillance Requirements, but Surveillance Requirement 4.4.5.2 was omitted from that revision. The staff finds the deletion of the now inconsistent and conflicting sentence acceptable.

c) On page 3/4 4-8, the licensee proposed to delete footnote *. This footnote rendered Surveillance Requirement 4.4.5.4.a.6 inapplicable for the duration of Cycle 7 operation up to June 30, 1986.

St. Lucie Unit 1 is now in Cycle 9 operation and the June 30, 1986 date has passed. The footnote is obsolete and should be deleted. For that reason the staff finds the proposed deletion acceptable.

St. Lucie Unit 2 TS only

a) On page 3/4 3-4, Table 3.3-1, ACTION 2, Process Measurement Circuit 1, the licensee proposed to distinguish between the wide-range logarithmic safety channels and the narrow-range linear safety channels. At present they are identified together as "Safety Channel - Nuclear Instrumentation." The proposed change would add subcategories "Wide Range" and "Linear Range."

Since the proposed change does not alter the meaning, intent or substance of the TS and is only of a clarifying nature, the staff finds the proposal acceptable.

b) The licensee proposed to delete a number of footnotes and requirements that are now obsolete, outdated and, therefore, no longer applicable. They are:

1) On page 3/4 4-2, delete Footnote **.
2) On page 3/4 4-12, delete Surveillance Requirement 4.4.5.*d.
3) On page 3/4 4-12a, delete note *(2).
4) On page 3/4 4-12a, delete Footnote *.
5) On page 3/4 9-9, delete Footnote *.

The above footnotes and requirements pertain to operations prior to initial criticality or to operations during specific cycles, all of which have now passed. St. Lucie Unit 2 achieved initial criticality on June 2, 1983, and is now operating in Cycle 5. The staff has reviewed all of the above proposals and found them outdated. For that reason the staff finds the proposed deletions acceptable.

c) On page 3/4 6-1, the licensee proposed to correct an error in Surveillance Requirement 4.6.1.1a. However, this error was previously corrected in Amendment No. 45 dated May 8, 1990, and is therefore not addressed in this SE.

St. Lucie Units 1 and 2

On pages 3/4 0-2 and B 3/4 0-6, the licensee proposed to revise Specification 4.0.2 and the Bases to Specification 4.0.2 to incorporate Generic Letter 89-14 line item improvements.

Specification 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillance and to permit consideration of plant operating conditions which may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25 percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded that Specification 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the proposed change to this specification and removes the 3.25 limit on three consecutive surveillances. Specification 4.0.2 presently reads:

> "4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:
>
> a. A maximum allowable extension not to exceed 25% of the test interval, and
>
> b. A total maximum combined interval time for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

In addition, the Bases of this specification will be updated to reflect the change and to note that it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified.

The licensee has proposed changes to Specification 4.0.2 that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the above change is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. We have determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). These amendments also relate to recordkeeping, reporting or administrative procedures or requirements. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: March 6, 1991

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