

St. Lucie Unit 1  
Docket No. 50-335  
Proposed Emergency License Amendment  
St. Lucie Unit 1 Containment Penetrations  
Surveillance Requirement

ATTACHMENT 1

ST. LUCIE UNIT 1 MARKED-UP TECHNICAL SPECIFICATION PAGE

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3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 CONTAINMENT VESSEL

CONTAINMENT VESSEL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 CONTAINMENT VESSEL INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without CONTAINMENT VESSEL INTEGRITY, restore CONTAINMENT VESSEL INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 CONTAINMENT VESSEL INTEGRITY shall be demonstrated:

a. At least once per 31 days by verifying that:

1. All containment vessel penetrations <sup>\*</sup>not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-2 of Specification 3.6.3.1, and
2. All containment vessel equipment hatches are closed and sealed.

b. By verifying that each containment vessel air lock is OPERABLE per Specification 3.6.1.3.

\* Not required for penetrations inside containment during fuel cycle 11.

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ATTACHMENT 2

**SAFETY ANALYSIS**

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SAFETY ANALYSIS

Introduction

Florida Power and Light Company (FPL) proposes to modify St. Lucie Unit 1 Technical Specification (TS) 4.6.1.1.a.1, Containment Integrity Surveillance Requirements, by excluding penetrations located inside containment from the verification that is required at least once per 31 days. This TS change will only apply to Unit 1 operation during fuel cycle 11. The provision to exclude verification of penetrations inside containment is necessary because some components are inaccessible during reactor operation or are located in areas of high radiation fields.

Discussion

TS 4.6.1.1.a requires, in part, that Containment Vessel Integrity shall be demonstrated at least once per 31 days by verifying that: " 1. All containment vessel penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-2 of Specification 3.6.3.1."

On December 23, 1992, a Notice of Violation (NRC Inspection Report Nos. 50-335/92-21 and 50-389/92-21) was issued to FPL citing the licensee for failure to maintain Containment Vessel Integrity in accordance with TS 4.6.1.1. prior to November 23, 1992. FPL provided a written response to this notice via FPL letter L-93-005 dated January 20, 1993, describing corrective actions that are being taken to avoid further violations.

On February 11, 1993, a telephone conversation was held between FPL and the Nuclear Regulatory Commission (NRC) regarding FPL letter L-93-005. The result of this conversation was a new interpretation for FPL of which valves constitute containment isolation valves. The new interpretation adds many new penetration components to the surveillance program which need to be verified per TS 4.6.1.1.a.1. Some of these components are inaccessible or are in areas of high radiation fields. An emergency TS change is necessary to avoid radiation dose to those employees who would be required to check these components inside containment.

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NRC requested that a proposed emergency license amendment be submitted by February 17, 1993. The emergency nature of this amendment was unavoidable since the containment integrity interpretation differences arose through the violation resolution process.

Safety Assessment

Following Unit 1's last refueling, during Cold Shutdown, all valves, flanges and capped test connections were verified to be closed or installed prior to entry into Mode 4 where containment integrity is required. These conditions were verified using system valve lineup procedures, local leak rate post test valve lineups and the containment integrity surveillance valve lineup which existed at that time. In addition, a recent visual inspection was conducted of all accessible containment vessel penetrations. Many of the systems contained therein are flooded or high energy systems which if breached would be detected either through instrumentation showing fluid leakage into the containment or increased radiation levels. Neither of these conditions exist.

Containment access is restricted physically by locked hatches and annunciated in the control room when any containment hatch is opened. During this cycle entries into Unit 1 containment have been restricted to anomaly inspections, 2 per month, that inspect the accessible areas of containment for any unusual conditions. Unit 1 containment was also accessible during a brief outage to replace a pressurizer code safety valve. The scope of work during this outage was limited and configuration control on all plant systems was controlled through approved plant procedures, the equipment clearance order procedure or the locked valve deviation log. Neither the anomaly inspections or the outage activities reduced the effectiveness of containment integrity. The probability of a valve misalignment is small.

NUREG-1432 "Combustion Engineering Standard Technical Specifications" page B 3.6-29, states it is appropriate not to perform a surveillance of isolation valves inside containment every 31 days "since these valves and blind flanges are operated under administrative control and the probability of their misalignment is low."

Compensatory measures described in FPL's request for Temporary Waiver of Compliance (FPL letter 93-042 dated February 12, 1993) will maintain an additional level of assurance that containment integrity is preserved. These compensatory measures include:

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- a. Inform all station operators via the night orders of the need to maintain strict and absolute control over entries into the containment.
- b. Brief all Unit 1 containment entry teams prior to entry concerning the importance of ensuring containment penetration isolation valves are left in their required position.

Excluding penetrations inside containment from this 31 day surveillance does not result in any physical change to the plant and does not involve changes to the procedures that are used to operate the facility. Therefore, the proposed amendment will not result in irreversible environmental consequences.

Based on the above discussions, FPL considers that the probability of misalignment of the affected penetrations, once they have been verified to be properly aligned, is small. Therefore, FPL concludes that operation of St. Lucie Unit 1 in accordance with the proposed amendment for the remainder of fuel cycle 11 is acceptable.

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**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION**

Pursuant to 10CFR50.92, a determination may be made that a proposed license amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed as follows:

(1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The compensatory measures associated with strict control of containment entries and the assurance of current valve position described in the supporting safety analysis for the proposed amendment provide assurance that containment integrity is preserved. Therefore, operation of the facility in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

This amendment does not result in any change to the physical plant or in the mode of operation of the plant. Therefore, operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

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(3) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The penetration components inside containment are operated under administrative control and entries into containment are restricted. Compensatory measures associated with the briefing of containment entry teams ensure that the probability of misalignment is low. Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the discussion presented above and on the supporting safety analysis, FPL has concluded that this proposed license amendment involves no significant hazards consideration.