

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Relocation of Tables of Instrument
Response Time Limits (GL 93-08)

ATTACHMENT 1

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3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR PROTECTIVE INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.1.1 As a minimum, the reactor protective instrumentation channels and bypasses of Table 3.3-1 shall be OPERABLE. ~~with RESPONSE TIMES as shown in Table 3.3-2.~~ ← delete

APPLICABILITY: As shown in Table 3.3-1.

ACTION:

As shown in Table 3.3-1.

SURVEILLANCE REQUIREMENTS

4.3.1.1.1 Each reactor protective instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during the modes and at the frequencies shown in Table 4.3-1.

4.3.1.1.2 The logic for the bypasses shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of channels affected by bypass operation. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.

4.3.1.1.3 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1:

insert **Neutron detectors are exempt from response time testing.**

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TABLE 3.3-2

REACTOR PROTECTIVE INSTRUMENTATION RESPONSE TIMES

FUNCTIONAL UNIT	RESPONSE TIME
1. Manual Reactor Trip	Not Applicable
2. Power Level - High	≤ 0.40 seconds*# and ≤ 8.0 seconds##
3. Reactor Coolant Flow - Low	≤ 0.65 seconds
4. Pressurizer Pressure - High	≤ 0.90 seconds
5. Containment Pressure - High	≤ 1.40 seconds
6. Steam Generator Pressure - Low	≤ 0.90 seconds
7. Steam Generator Water Level - Low	≤ 0.90 seconds
8. Local Power Density - High	≤ 0.40 seconds*# and ≤ 8.0 seconds##
9. Thermal Margin/Low Pressure	≤ 0.90 seconds*# and ≤ 8.0 seconds##
9a. Steam Generator Pressure Difference - High	≤ 0.90 seconds
10. Loss of Turbine--Hydraulic Fluid Pressure - Low	Not Applicable
11. Wide Range Logarithmic Neutron Flux Monitor	Not Applicable

*Neutron detectors are exempt from response time testing. Response time shall be measured from detector output or input of first electronic component in channel.

#Response time does not include contribution of RTDs.

##RTD response time only. This value is equivalent to the time interval required for the RTDs output to achieve 63.2% of its total change when subjected to a step change in RTD temperature.

delete table & replace with DELETED

INSTRUMENTATION

3/4.3.2 ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2.1 The Engineered Safety Feature Actuation System (ESFAS) instrumentation channels and bypasses shown in Table 3.3-3 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4. ~~and with RESPONSE TIMES as shown in Table 3.3-5~~ delete

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

- a. With an ESFAS instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, declare the channel inoperable and apply the applicable ACTION requirement of Table 3.3-3 until the channel is restored to OPERABLE status with the trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With an ESFAS instrumentation channel inoperable, take the ACTION shown in Table 3.3-3.

SURVEILLANCE REQUIREMENTS

4.3.2.1.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during the modes and at the frequencies shown in Table 4.3-2.

4.3.2.1.2 The logic for the bypasses shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of channels affected by bypass operation. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation:

4.3.2.1.3 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ESF function as shown in the "Total No. of Channels" Column of Table 3.3-3.

TABLE 3.3-5

ENGINEERED SAFETY FEATURES RESPONSE TIMES

INITIATING SIGNAL AND FUNCTION

RESPONSE TIME IN SECONDS

1. Manual

a. SIAS

Safety Injection (ECCS)

Not Applicable

Containment Fan Coolers

Not Applicable

Feedwater Isolation

Not Applicable

Containment Isolation

Not Applicable

b. CSAS

Containment Spray

Not Applicable

c. CIS

Containment Isolation

Not Applicable

Shield Building Ventilation System

Not Applicable

d. RAS

Containment Sump Recirculation

Not Applicable

e. MSIS

Main Steam Isolation

Not Applicable

Feedwater Isolation

Not Applicable

f. AFAS

Auxiliary Feedwater Actuation

Not Applicable

2. Pressurizer Pressure-Low

a. Safety Injection (ECCS)

≤ 30.0*/19.5**

b. Containment Isolation ***

≤ 30.5*/20.5**

c. Containment Fan Coolers

≤ 30.0*/17.0**

d. Feedwater Isolation

≤ 60.0

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TABLE 3.3-5 (Continued)

ENGINEERED SAFETY FEATURES RESPONSE TIMES

<u>INITIATING SIGNAL AND FUNCTION</u>	<u>RESPONSE TIMES IN SECONDS</u>
3. <u>Containment Pressure-High</u>	
a. Safety Injection (ECCS)	≤ 30.0*/19.5**
b. Containment Isolation***	≤ 30.5*/20.5**
c. Shield Building Ventilation System	≤ 30.0*/14.0**
d. Containment Fan Coolers	≤ 30.0*/17.0**
e. Feedwater Isolation	≤ 60.0
4. <u>Containment Pressure -- High-High</u>	
a. Containment Spray	≤ 30.0*/18.5**
5. <u>Containment Radiation-High</u>	
a. Containment Isolation***	≤ 30.5*/20.5**
b. Shield Building Ventilation System	≤ 30.0*/14.0**
6. <u>Steam Generator Pressure-Low</u>	
a. Main Steam Isolation	≤ 6.9
b. Feedwater Isolation	≤ 60.0
7. <u>Refueling Water Storage Tank-Low</u>	
a. Containment Sump Recirculation	≤ 91.5
8. <u>Steam Generator Level-Low</u>	
a. Auxiliary Feedwater	≥ 205**, ≤ 305 *

TABLE NOTATION

*Diesel generator starting and sequence loading delays included.

**Diesel generator starting and sequence loading delays not included.
Offsite power available.

***Not applicable to containment isolation valve I-MV-18-1.

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3/4.3 INSTRUMENTATION

3/4.3.1 REACTOR PROTECTIVE INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.1 As a minimum, the reactor protective instrumentation channels and bypasses of Table 3.3-1 shall be OPERABLE, ~~with RESPONSE TIMES as shown in~~ ~~Table 3.3-2.~~ *delete*

APPLICABILITY: As shown in Table 3.3-1.

ACTION:

As shown in Table 3.3-1.

SURVEILLANCE REQUIREMENTS

4.3.1.1 Each reactor protective instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-1.

4.3.1.2 The logic for the bypasses shall be demonstrated OPERABLE prior to each reactor startup unless performed during the preceding 92 days. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.

4.3.1.3 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. [^] Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

Neutron detectors are exempt from response time testing.

TABLE 3.3-2

REACTOR PROTECTIVE INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
1. Manual Reactor Trip	Not Applicable
2. Variable Power Level - High	≤ 0.40 second ^{*,**}
3. Pressurizer Pressure - High	≤ 1.15 seconds
4. Thermal Margin/Low Pressure	≤ 0.90 second ^{**}
5. Containment Pressure - High	≤ 1.15 seconds
6. Steam Generator Pressure - Low	≤ 1.15 seconds
7. Steam Generator Pressure Difference - High	≤ 1.15 seconds
8. Steam Generator Level - Low	≤ 1.15 seconds
9. Local Power Density - High	≤ 0.40 second ^{*,**}

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TABLE 3.3-2 (Continued)

REACTOR PROTECTIVE INSTRUMENTATION RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u>
10. Loss of Component Cooling Water to Reactor Coolant Pumps	Not Applicable
11. Reactor Protection System Logic	Not Applicable
12. Reactor Trip Breakers	Not Applicable
13. Wide Range Logarithmic Neutron Flux Monitor	Not Applicable
14. Reactor Coolant Flow - Low	0.65 second
15. Loss of Load (Turbine Hydraulic Fluid Pressure - Low)	Not Applicable

* Neutron detectors are exempt from response time testing. Response time of the neutron flux signal portion of the channel shall be measured from detector output or input of first electronic component in channel.

** Based on a resistance temperature detector (RTD) response time of less than or equal to 14.0 seconds where the RTD response time is equivalent to the time interval required for the RTD output to achieve 63.2% of its total change when subjected to a step change in RTD temperature.

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INSTRUMENTATION

3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and bypasses shown in Table 3.3-3 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4, ~~and with RESPONSE TIMES as shown in Table 3.3-5~~ ← delete

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

- a. With an ESFAS instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3-4, declare the channel inoperable and apply the applicable ACTION requirement of Table 3.3-3 until the channel is restored to OPERABLE status with the trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With an ESFAS instrumentation channel inoperable, take the ACTION shown in Table 3.3-3.

SURVEILLANCE REQUIREMENTS

4.3.2.1 Each ESFAS instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.3-2.

4.3.2.2 The logic for the bypasses shall be demonstrated OPERABLE during the at power CHANNEL FUNCTIONAL TEST of channels affected by bypass operation. The total bypass function shall be demonstrated OPERABLE at least once per 18 months during CHANNEL CALIBRATION testing of each channel affected by bypass operation.

4.3.2.3 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" Column of Table 3.3-3.

TABLE 3.3-5

ENGINEERED SAFETY FEATURES RESPONSE TIMES

<u>INITIATING SIGNAL AND FUNCTION</u>	<u>RESPONSE TIME IN SECONDS</u>
1. <u>Manual</u>	
a. SIAS Safety Injection (ECCS) Containment Isolation ⁽¹⁾ Shield Building Ventilation System Containment Purge Valve Isolation Containment Fan Coolers	Not Applicable Not Applicable Not Applicable Not Applicable Not Applicable
b. CSAS Containment Spray Iodine Removal	Not Applicable Not Applicable
c. CIAS Containment Isolation ⁽¹⁾ Shield Building Ventilation System Containment Purge Valve Isolation	Not Applicable Not Applicable Not Applicable
d. MSIS Main Steam Isolation Feedwater Isolation	Not Applicable Not Applicable
e. RAS Containment Sump Recirculation	Not Applicable
f. AFAS Auxiliary Feedwater Actuation Feedwater Isolation	Not Applicable Not Applicable

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TABLE 3.3-5 (Continued)

ENGINEERED SAFETY FEATURES RESPONSE TIMES

INITIATING SIGNAL AND FUNCTION

RESPONSE TIME IN SECONDS

2.	<u>Pressurizer Pressure-Low</u>	
a.	Safety Injection (ECCS)	≤ 30.0*/20.0**
b.	Containment Isolation ⁽¹⁾	≤ 21.75*/11.75**
c.	Shield Building Ventilation System	≤ 26.0*/10.0**
d.	Containment Fan Coolers	≤ 24.15*/11.15**
e.	Charging Flow	≤ 330.00*/180.00**
3.	<u>Containment Pressure-High</u>	
a.	Safety Injection (ECCS)	≤ 30.0*/20.0**
b.	Containment Isolation ⁽¹⁾	≤ 21.75*/11.75**
c.	Shield Building Ventilation System	≤ 26.0*/10.0**
d.	Containment Fan Coolers	≤ 24.15*/11.15**
e.	Feedwater Isolation	≤ 5.15*/5.15**
f.	Main Steam Isolation	≤ 6.75*/6.75**
4.	<u>Containment Pressure--High-High</u>	
a.	Containment Spray/Iodine Removal	≤ 25.65*/11.15**
5.	<u>Containment Radiation-High</u>	
a.	Containment Isolation ⁽¹⁾	≤ 26.75*/16.75**
b.	Shield Building Ventilation System	≤ 32.75*/16.75**
6.	<u>Steam Generator Pressure-Low</u>	
a.	Feedwater Isolation	≤ 5.15/5.15**
b.	Main Steam Isolation	≤ 6.75/6.75**
7.	<u>Refueling Water Storage Tank-Low</u>	
a.	Containment Sump Recirculation	≤ 111.15*/101.15**
8.	<u>4.16 kV/Emergency Bus Undervoltage (Loss of Voltage)</u>	
a.	Loss of Power (4.16 kV)	≤ 14
b.	Loss of Power (480 V)	≤ 14
9.	<u>4.16 kV Emergency Bus Undervoltage (Degraded Voltage)</u>	
a.	Loss of Power (4.16 kV)	≤ 12
b.	Loss of Power (480 V)	≤ 22

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TABLE 3.3-5 (Continued)

ENGINEERED SAFETY FEATURES RESPONSE TIMES

INITIATING SIGNAL AND FUNCTION

RESPONSE TIME IN SECONDS

10. Steam Generator Level-Low

a. Auxiliary Feedwater

≤ 305*/≤305**

TABLE NOTATION

* Diesel generator starting and sequence loading delays included. Response time limit includes movement of valves and attainment of pump or blower discharge pressure.

** Diesel generator starting and sequence loading delays not included. Offsite power available. Response time limit includes movement of valves and attainment of pump or blower discharge pressure.

(1) Containment Isolation response time is applicable to the valves specified in Specification 3.6.3.

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ATTACHMENT 3

EVALUATION OF PROPOSED TS CHANGES

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EVALUATION OF PROPOSED TS CHANGES

Introduction

Florida Power and Light Company (FPL) proposes to change the St. Lucie Unit 1 and Unit 2 Technical Specifications (TS) by deleting the tables of response time limits for instrumentation of the Reactor Protective System (RPS) and the Engineered Safety Features Actuation System (ESFAS). The tables will be relocated to the Unit 1 and Unit 2 Updated Final Safety Analysis Report (UFSAR) in accordance with the guidance provided in USNRC Generic Letter 93-08 (GL 93-08). Neither the requirements to perform response time testing nor the specified limits are changed by this proposal. Following approval of the changes, the RPS and ESFAS response time limits will be included in the next update of the UFSAR for each unit pursuant to 10 CFR 50.71(e).

Description of TS Changes for St. Lucie Units 1 and 2

TS 3.3.1.1 (Unit 1) and 3.3.1 (Unit 2): Delete the words, "with RESPONSE TIMES as shown in Table 3.3-2."

TS 4.3.1.1.3 (Unit 1) and 4.3.1.3 (Unit 2): Insert the words "Neutron detectors are exempt from response time testing" as shown in Attachments 1 and 2 of this submittal.

Table 3.3-2: This table is deleted in its entirety.

TS 3.3.2.1 (Unit 1) and 3.3.2 (Unit 2): Delete the words, "with RESPONSE TIMES as shown in Table 3.3-5."

Table 3.3-5: This table is deleted in its entirety.

Bases for the Proposed Changes

Limiting Conditions for Operation (LCOs) for RPS and ESFAS instrumentation presently require these systems to be operable with response times as specified in the applicable TS tables.

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Surveillances must be performed prior to entering an operational mode for which the associated LCO is applicable. The existing RPS and ESFAS Surveillance Requirements (SR) specify that the response time of each function shall be demonstrated to be within its limit at least once per 18 months. Relocating Tables 3.3-2 and 3.3-5 from the TS to the UFSAR will not alter these SR. Therefore, deleting the LCO references to response times and the corresponding TS tables will not change the functional capability or performance levels of the RPS or ESFAS systems. The proposed changes to TS 3.3.1.1 (Unit 1) and 3.3.1 (Unit 2) are compatible with relocating the referenced tables and are consistent with the guidance provided in GL 93-08.

A footnote (*) in the table of response time limits for the RPS (Table 3.3-2) states that, "Neutron detectors are exempt from response time testing." To retain this exemption, the proposed amendments incorporate the footnote into the text of SR 4.3.1.1.3 (Unit 1) and 4.3.1.3 (Unit 2) as shown in Attachments 1 and 2, respectively, to this submittal. This revision is consistent with the guidance provided by Enclosures 1 and 2 of GL 93-08.

Tables 3.3-2 and 3.3-5 will be incorporated into the UFSARs for St. Lucie Units 1 and 2. This includes the footnotes which provide clarification of response time limits in the tables to describe how those limits are applied. The proposed changes are simply revisions involving relocation and do not alter any of the specified limits, including those channels for which the time response limit is stated as "Not Applicable." Each UFSAR will thereby address the RPS and ESFAS instrumentation time response and changes to these limits will be controlled in accordance with 10 CFR 50.59. In addition, changes to these limits will be submitted to the NRC as part of the UFSAR updates provided pursuant to 10 CFR 50.71(e).

FPL has confirmed that the existing plant procedures for time response testing include acceptance criteria which reflect the RPS and ESFAS limits currently specified in TS Tables 3.3-2 and 3.3-5. Changes to these plant procedures are subject to the provisions of Administrative Controls section 6.0 of each facility's TS. Following approval of these proposed license amendments, the RPS and ESFAS instrumentation response time limits will be included in the next update to each UFSAR for St. Lucie Unit 1 and Unit 2.

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Conclusion

The proposed amendments are line-item improvements which conform to the guidance given in Enclosures 1 and 2 of GL 93-08. As stated in GL 93-08, "The NRC has already implemented this line-item TS improvement for recently issued operating licenses and in the improved standard technical specifications." Therefore, FPL considers the proposed changes to the St. Lucie Unit 1 and Unit 2 TS to be acceptable.

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ATTACHMENT 4

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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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 proposed amendments for St. Lucie Units 1 and 2 simply relocate tables of response time limits for instrumentation of the Reactor Protective System (RPS) and Engineered Safety Features Actuation System (ESFAS) from the Technical Specifications (TS) to the Updated Safety Analysis Report (UFSAR). The proposed amendments conform to the guidance given in Enclosures 1 and 2 of USNRC Generic Letter 93-08 (GL 93-08). Neither the response time limits nor the surveillance requirements for performing response time testing will be altered by this submittal. The overall RPS and ESFAS system functional capabilities will not be changed and assurance that actions of the protective and engineered safety features systems are completed within the time limits assumed in the accident analyses is unaffected by the proposed TS changes. 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.

The proposed amendment will not change the physical plant or the modes of plant operation defined in the Facility License. The

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change does not involve the addition or modification of equipment nor does it alter the design or operation of plant systems. 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.

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

The measurement of instrumentation response times at the frequencies specified in the TS provides assurance that actions associated with the protective and engineered safety features systems are accomplished within the time limits assumed in the St. Lucie Units 1 and 2 accident analyses. The response time limits and the measurement frequencies remain unchanged by the proposed amendments. The proposed changes do not alter the basis for any other Technical Specification that is related to the establishment of or maintenance of a nuclear safety margin. 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 Evaluation of Proposed TS Changes, FPL has concluded that this proposed license amendment involves no significant hazards consideration.