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SUBJECT: Forwards response to addl info dtd 940601 re proposed license amends flood protection.

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August 31, 1994

L-94-220
10 CFR 50.90

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

RE: St. Lucie Units 1 & 2
Docket Nos. 50-335 & 50-389
Proposed License Amendments
Flood Protection - Request for
Additional Information

Florida Power and Light Company(FPL) has reviewed your request for addition information dated June 1, 1994. Responses to the particular questions are provided as an attachment.

Please contact us if there are any questions about this submittal.

Very truly yours,

D. A. Sager
Vice President
St. Lucie Plant

DAS/LLM/kw
DAS/PSL #1195-94

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

Mr. W. A. Passetti, Florida Department of Health and
Rehabilitative Services.

06/01/94

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Attachment

NRC question 1

Your request proposes to eliminate the design feature 5.1.3 for St. Lucie 1. The Safety Analysis does not contain discussion or justification for its elimination. The only reference to the design feature 5.1.3 is in your conclusion which states: "FPL proposes to remove design feature 5.1.3 from the Unit 1 Technical Specifications. These provisions are not considered to be important in relation to the other design features described within this section of the Technical Specifications."

Please provide:

- a) Discussion and justification for removing design feature 5.1.3 from the Technical Specifications (TS)
- b) Explanation of how the relative importance of design features serves as the reason for their removal from TS

FPL response

a) Design Feature 5.1.3 states that the flood control provisions (dunes and slope protection) shall be designed and maintained in accordance with the original design provisions contained in Section 2.4.2.2 of the FSAR. This section of the FSAR generally describes the dunes and the mangrove marsh as they existed at the time of St. Lucie 1 licensing. Also included are descriptions of the surveys of these features as required by the Technical Specifications. Justification for removal of Design Feature 5.1.3 is provided as follows:

1. As described in our proposed license amendment (PLA), the existence of the dunes, mangroves, and associated surveillances is not considered to be safety significant. The dunes and mangroves are not credited in the St. Lucie flooding analysis. Removal of the references to the dunes and mangroves in the Design Features section of the Technical Specifications is considered consistent with the proposed removal of the associated surveillances.

2. On March 17, 1993, the Executive Director of Operations issued for Commission approval a draft Final Policy Statement on Technical Specification Improvements. This Policy Statement provided criteria that defined requirements that should be controlled by the Technical Specifications. The St. Lucie flood protection Technical Specifications do not satisfy any of the four criteria for Technical Specifications that should remain.

Criterion 1 discusses instrumentation that is used to detect degradation of the Reactor Coolant System boundary. Clearly, the dunes and mangroves are not related to this type of instrumentation.

Criterion 2 discusses process variables, design features, or operating restrictions that are initial conditions of Design Basis Accidents or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The purpose of this criterion is to capture those process variables that have initial values assumed in the Design Basis Accident and Transient analyses, and which are monitored and controlled during power operation. The dune and mangrove features are not these types of variables and they are not an input to the St. Lucie analyses.

Criterion 3 discusses structures, systems, or components that are part of the primary success path and which function or actuate to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. It is the intent of this criterion to capture into Technical Specifications only those structures, systems, and components that are part of the primary success path of a safety sequence analysis. The dunes and mangroves do not function nor actuate to mitigate the consequences of a Design Basis Accident.

Criterion 4 discusses structures, systems, or components which operating experience or probabilistic safety assessments has shown to be significant to public health and safety. Procedural Guidance for the Individual Plant Examination of External Events for Severe Accident Vulnerabilities (NUREG-1407) provides a means for assessing the risk for various external events. It concludes in section 2.4 that for plants designed against current criteria as described in Regulatory Guide 1.59 and applicable Standard Review Plan Sections, particularly Section 2.4, floods pose no significant threat of a severe accident because the exceedance frequency of the design basis flood, excluding floods due to failure of upstream dams, is judged to be less than $1E-5$, and the conditional core damage frequency for a design basis flood is judged to be less than $1E-1$. Thus the core damage frequencies are estimated to be less than $1E-6$ per year for the plant designed against the NRC's current criteria. The NRC found in the St. Lucie Safety Evaluation Report (NUREG-0843) that the design flood levels have been determined in accordance with the procedures in Regulatory Guide 1.59. Hardened protection for safety-related components has been provided for the St. Lucie probable maximum flood determined per Regulatory Guide 1.59. Therefore, the risk from external floods is acceptably low as described above. FPL's flooding analysis did not take credit for the existence of the dunes or mangroves. Thus, removing the dune and mangrove surveillances is not considered

to pose significant risk to the public health and safety.

3. Flood protection Technical Specifications are not included as Limiting Conditions for Operation or as Design Features in the Standard Technical Specifications-Combustion Engineering Plants (NUREG-1432).

b) The St. Lucie submittal stated that "these provisions are not considered to be important in relation to the other design features described within this section of the Technical Specifications". The intent of this statement was to compare design feature 5.1.3 (dune and slope protection) to the other St. Lucie design feature Technical Specifications. Technical Specification 5.1.3 did not appear to compare from a safety significance standpoint to the other design features included. Removal from the St. Lucie 1 Technical Specifications would make St. Lucie 1 design features more similar to St. Lucie 2 design features.

NRC question 2

In the NRC Safety Evaluation Report (SER) for Unit 2 (NUREG-0843), on page 2-14 and again on page 2-17, there is a discussion of two FPL commitments regarding the conditions of beach dunes and highway embankment: "The erosion analysis is considered to be conservative provided that the State SR-A1A embankment and sufficient beach material east of the embankment exist at the start of the storm in order to limit the heights of breaking waves to those used in the 'stalled hurricane' erosion analysis." The two commitments are then described, and the SER goes on to state: "These above listed commitments (1 and 2) will not be required, however, as long as existing technical specifications for Unit 1 requiring beach dune surveys and monitoring of mangrove swamps (Section 2.4.2.2 of SL-1 FSAR) remain in effect."

The NRC conclusion in the SER that the erosion analysis is conservative was conditioned on periodic verification of the soundness of the beach dunes and highway embankment. You are now proposing to remove the above-mentioned surveys from the TS, but your Safety Analysis is silent on the issue of the two commitments.

Please provide: Discussion addressing the issue of the two commitments.

FPL response

FPL was silent on these commitments since they were not considered within the scope of our request for changes to Technical Specifications pursuant to 10 CFR 50.90. Upon NRC staff approval of our request, FPL intends to disposition these commitments via a safety evaluation in accordance 10 CFR 50.59. The evaluation will address the conditions of beach dunes and highway embankment and their effect on the conservatism of the erosion analysis. If a negative declaration under 50.59 is not the result of the evaluation, the commitments will be included in appropriate St. Lucie Plant procedures.



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