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 AUTH.NAME AUTHOR AFFILIATION
 SAGER, D.A. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-67 & NPF-16, relocating operability requirements for INCORE DETECTORS (TS 3/4.3.3.2) to updated FSAR & revising LHR surveillance 4.2.1.4 & special test exceptions surveillances.

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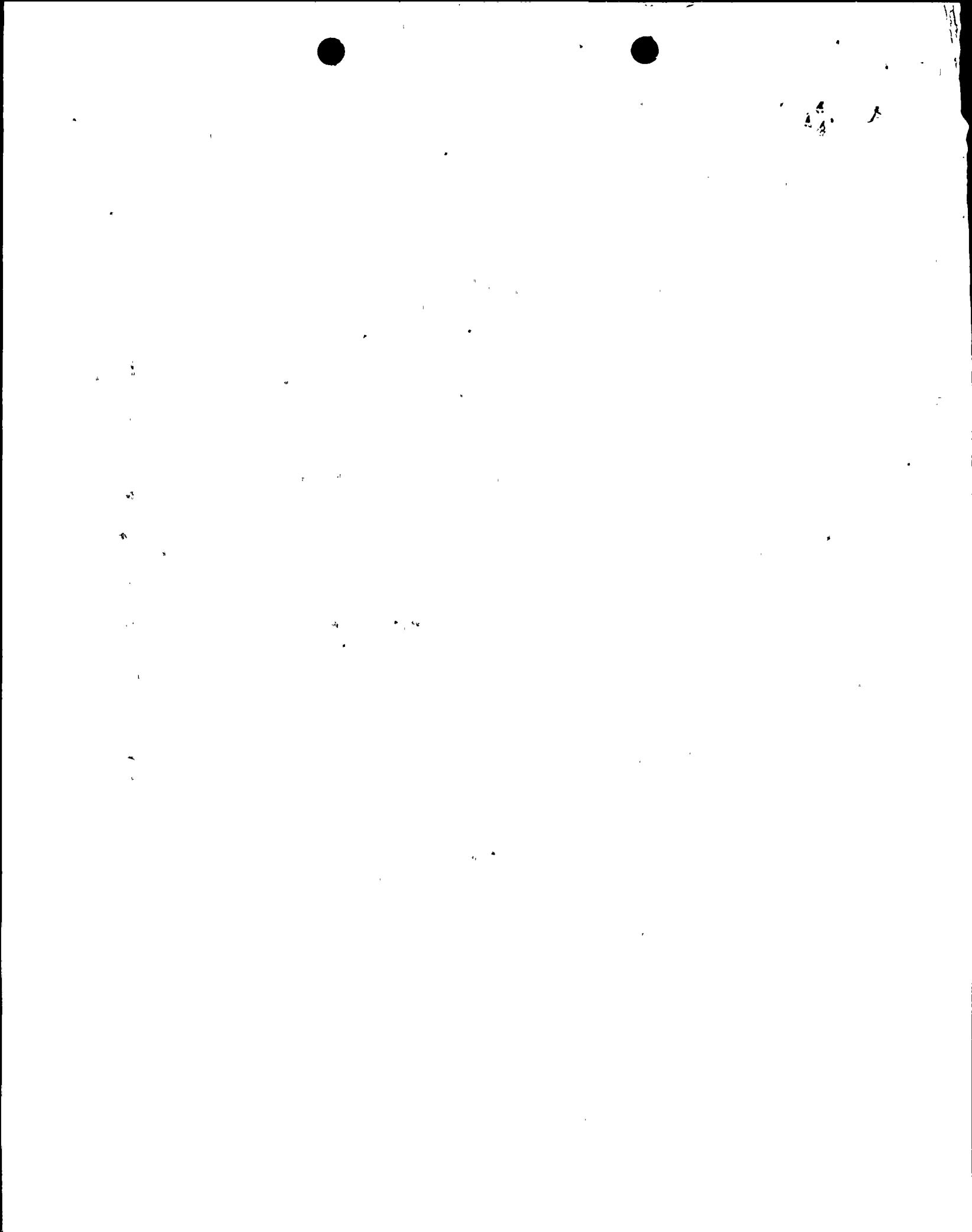
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January 20, 1995

L-95-004
10 CFR 50.90

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

RE: St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Relocation of LCO for Incore Detectors
to the Updated Final Safety Analysis Report

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 and NPF-16 for St. Lucie Unit 1 and Unit 2, respectively, by incorporating the attached Technical Specifications (TS) revisions. The proposed amendments will relocate the operability requirements for the INCORE DETECTORS (TS 3/4.3.3.2) to the Updated Final Safety Analysis Report, and revise Linear Heat Rate surveillance 4.2.1.4, and Special Test Exceptions surveillances 4.10.2.2, 4.10.4.2 (Unit 2 only), and 4.10.5.2, accordingly.

The basis for this request is consistent with NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," and with the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" published in the Federal Register (58 FR 39132) dated July 22, 1993. It is requested that the proposed amendments, if approved, be issued by July 31, 1995.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain copies of the appropriate technical specifications pages marked up to show the proposed changes.

The proposed amendments have been reviewed by the St. Lucie Facility Review Group and the FPL Company Nuclear Review Board. In accordance with 10 CFR 50.91 (b) (1), copies of the proposed amendments are being forwarded to the State Designee for the State of Florida.

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

Very truly yours,

D. A. Sager
Vice President
St. Lucie Plant

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DAS/RLD

Attachments

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.

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STATE OF FLORIDA)
)
COUNTY OF ST. LUCIE) ss.

D. A. Sager being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant for the Nuclear Division of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

DA Sager
D. A. Sager

STATE OF FLORIDA
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 20th day of January, 1995 by D.A. Sager, who is personally known to me and who did take an oath.

Karen West
KAREN WEST
Name of Notary Public

My Commission expires 4-18-95
Commission No. CC 359926

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ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES

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EVALUATION OF PROPOSED TS CHANGES

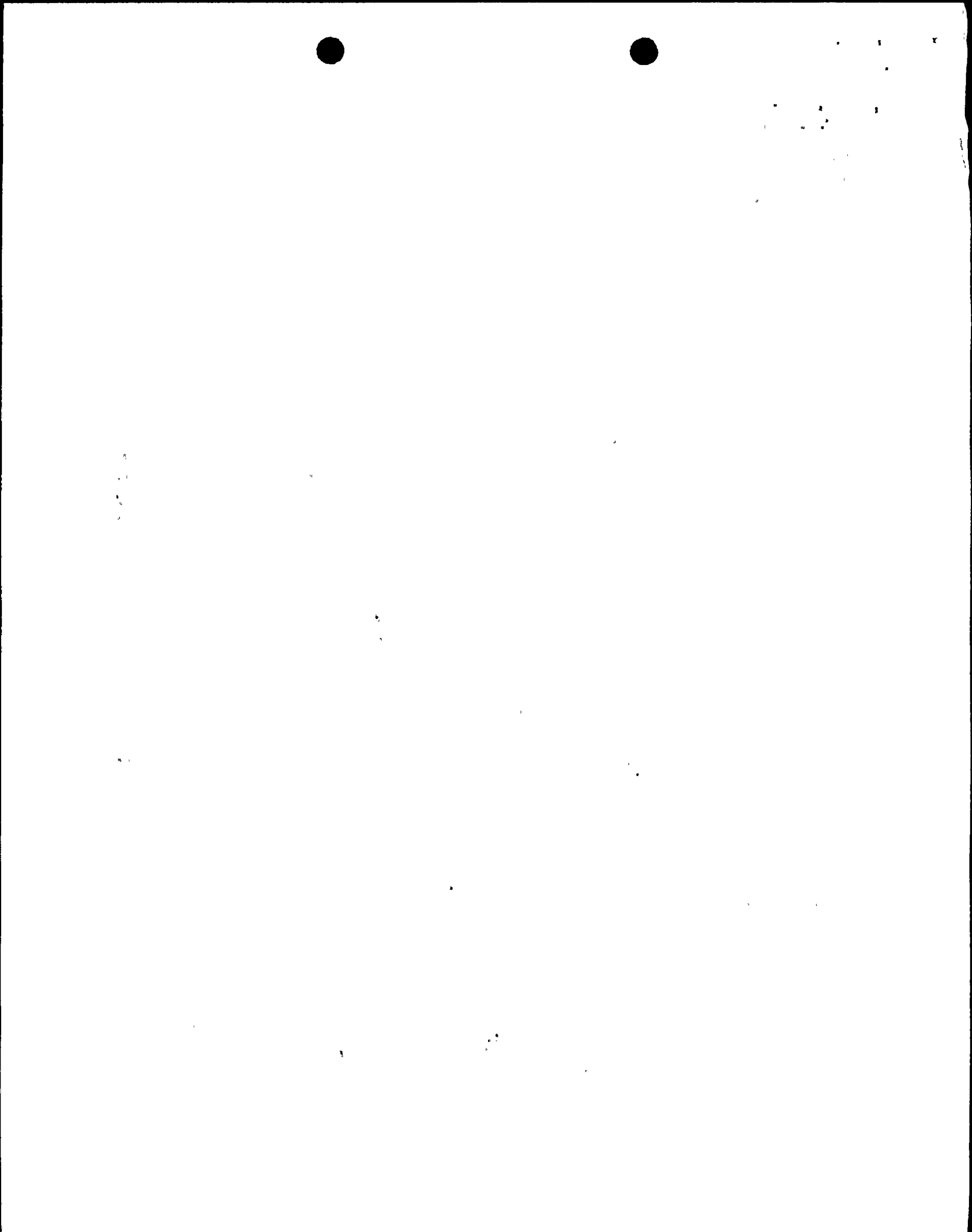
Introduction

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating License DPR-67 for St. Lucie Unit 1 (PSL1) and NPF-16 for St. Lucie Unit 2 (PSL2) be revised to remove the Limiting Conditions for Operation (LCO), Surveillance Requirements (SR), and associated Bases for INCORE DETECTORS from the Technical Specifications (TS). The applicable requirements of TS 3/4.3.3.2 will be relocated to the Updated Final Safety Analysis Report (UFSAR) for each unit. In addition, the uncertainty factors presently specified in Linear Heat Rate (LHR) SR 4.2.1.4.b that are associated with the incore detector Local Power Density alarm setpoints will likewise be relocated. Relocating these requirements to the UFSARs will allow FPL to administratively control changes to the incore monitoring instrumentation pursuant to 10 CFR 50.59, and without the need to process a license amendment.

The proposed amendments are consistent with the NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" that was published in the Federal Register (58 FR 39132) dated July 22, 1993. This proposal also conforms with NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," dated September, 1992, in that operability requirements for incore detectors are not included in the standard TS.

Background

St. Lucie Unit 1 TS 3.2.1, 3.2.3, and 3.2.4 provide limits on LHR, Total Integrated Radial Peaking Factor (F_r^T) and Azimuthal Power Tilt (T_q). St. Lucie Unit 2 TS 3.2.1, 3.2.2, 3.2.3, and 3.2.4 provide limits on LHR, Total Planar Radial Peaking Factor (F_{xy}^T), F_r^T , and T_q . These core power distribution limits reflect the assumptions made in the UFSAR safety analyses, and compliance with these limits is verified using the Incore Instrumentation (ICI) System specific to each PSL unit.



At St. Lucie Unit 1, the ICI system consists of 45 neutron detector strings positioned in the center guide tube of selected fuel assemblies. Each string contains four self-powered, Rhodium neutron detectors positioned at fixed elevations along the active fuel height. At St. Lucie Unit 2, there are a total of 56 similar neutron detector strings in the ICI system.

The neutron flux indicated by the incore detector signals is processed by a unit specific, full core power distribution calculational system to develop measured values of the core peaking factors, and to determine incore detector alarm setpoints based on linear heat rate. The incore system is also used to recalibrate the Excore Neutron Flux Detector System pursuant to Specification 4.3.1.1.1 (PSL1) and 4.3.1.1 (PSL2). The ICI System is not used for automatic protective or control functions and the system, by itself, has no design safety function.

Specification 3/4.3.3.2 provides the minimum requirements for the number and distribution of incore detectors that must be used, and the surveillances that must be performed, when the ICI System is used for monitoring the core power distribution or recalibrating the excore detectors.

Description of Proposed TS Changes (PSL1 and PSL2)

- INDEX Page IV (PSL1) and Page V (PSL2) will be revised to delete "Incore Detectors" and the associated page reference.
- TS 4.2.1.4.b (LINEAR HEAT RATE) will be revised to remove the uncertainty factors associated with the determination of incore detector alarm setpoints. These uncertainties will be relocated to the UFSAR along with the ICI operability requirements.
- TS 3/4.3.3.2 (INCORE DETECTORS) will be deleted from the TS, and relocated to the UFSAR.
- TS 4.10.2.2, 4.10.4.2 (PSL2 only), and 4.10.5.2 (SPECIAL TEST EXCEPTIONS) will be revised to delete reference Specification 3.3.3.2 (Incore Detectors LCO), and where not presently indicated, include reference Specification 4.2.1.4 (LHR).

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•Bases Section 3/4.2.1 (LINEAR HEAT RATE) will be revised to delete the numerical values listed for the uncertainty allowances included in the incore detector alarm setpoints. Only the types of allowances will be described in the bases, the numerical values will be relocated to the UFSAR.

•Bases Section 3/4.3.2 (INCORE DETECTORS) will be replaced with the word "DELETED."

Bases for the Proposed Changes

The NRC's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (58 FR 39132) provides four criteria which delineate the constraints on design and operation of nuclear power plants that belong in the technical specifications. In addition, the policy encourages technical specification line-item improvements such as: "LCOs which do not meet any of the criteria may be proposed for removal from the technical specifications and relocated to other licensee-controlled documents, such as the FSAR." A review of the four criteria as they relate to the St. Lucie Unit 1 and 2 ICI Systems follows:

•Criterion 1: *Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

Discussion: The ICI system provides no function which would indicate a degradation in the reactor coolant system boundary.

•Criterion 2: *A process variable, design feature, or operating restriction that is an initial condition of a Design basis Accident or Transient analysis that either assumes the failure of, or presents a challenge to the integrity of a fission product barrier.*

Discussion: The ICI system is used to monitor certain core power distribution parameters, which are process variables as described above. The proposed change would not remove the limits for those parameters from the technical specifications. Rather, only the details associated with how the core power distribution is measured

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will be relocated to the UFSAR. The method of measuring a process variable does not satisfy Criterion 2.

•Criterion 3: *A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Discussion: The ICI system does not function to mitigate a Design Basis Accident or Transient.

•Criterion 4: *A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.*

Discussion: Operating experience with the St. Lucie units has not exposed the ICI System as significant to public health and safety. The system is not among the systems, structures, or components that are included in the probabilistic safety assessment for either unit. Moreover, the ICI system cannot be used to mitigate the consequences of any transient, nor does it otherwise perform a design safety function. Therefore, the existing TS requirements involving the ICI System are considered not significant to the protection of public health and safety.

SR 4.2.1.4.b. prescribes calculational and/or measurement uncertainty factors to be included in the setting of incore detector Local Power Density alarm setpoints, if the incore detectors are used for monitoring LHR. Numerical values for these factors are part of the specific methodology used to relate the incore detector signals to LHR for each PSL unit, and are associated with the ICI operability requirements. The preceding discussions of the ICI System relative to the four screening criteria are equally applicable to the uncertainty factors, and the LHR limits will not be altered by the proposed amendment. Therefore, FPL believes relocating these uncertainty factors to the UFSAR along with the ICI operability requirements is appropriate, and is consistent with the Policy Statement and NUREG-1432.

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SR 4.10.2.2, 4.10.4.2 (PSL2 only), and 4.10.5.2 (SPECIAL TEST EXCEPTIONS) will be revised to reflect the proposed deletion of LCO 3.3.3.2 from the TS. Where indicated in Attachments 3 and 4 of this submittal, the proper reference specification for monitoring LHR using the "Incore Detector Monitoring System," e.g., TS 4.2.1.4, will be added. These changes are only administrative in nature and do not alter the specified requirements.

Bases Section 3/4.2.1 (LINEAR HEAT RATE) will be revised to remove the numerical values shown for the uncertainty factors that are included in the setpoints for incore detector alarms. This is consistent with the proposed change to SR 4.2.1.4.b. The basis upon which the LCO for LHR is established is not altered by this proposal.

Conclusion

The LCO and related uncertainty factors for the ICI systems at PSL1 and PSL2 do not meet any of the criteria that have been established by the NRC for the purpose of defining constraints on design and operation of nuclear power plants that should be included and/or retained in the Technical Specifications. Removal of these items from the TS is therefore consistent with the NRC Final Policy Statement on TS Improvements as well as the Standard Technical Specifications for Combustion Engineering Plants (NUREG-1432).

The proposal is essentially administrative in nature and does not change the functional capability or required performance level of the ICI system. The UFSAR for each St. Lucie unit will incorporate the provisions of the removed Technical Specifications. Revisions which are made to the UFSAR are reported to the NRC in accordance with 10 CFR 50.71(e); and changes to the ICI system will be controlled pursuant to 10 CFR 50.59. In addition, plant procedures that are used to implement the operability and surveillance requirements of the incore system reflect the existing TS requirements, and changes to these procedures are governed by the administrative controls of TS Section 6.0.

For the reasons stated above, FPL believes that the proposed amendment is acceptable.

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ATTACHMENT 2

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 changes are administrative in nature in that the specifications for operation and surveillance of the Incore Instrumentation (ICI) System will be relocated from the Technical Specifications to the Updated Final Safety Analysis Report for St. Lucie Unit 1 and Unit 2. Changes to the system will be controlled by 10 CFR 50.59, and the safety analysis report is required to be updated pursuant to 10 CFR 50.71(e). Relocation of these requirements to the UFSAR is consistent with the NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" published in the Federal Register (58 FR 39132) dated July 22, 1993.

Incore instrumentation is not an accident initiator nor a part of the success path(s) which function to mitigate accidents evaluated in the plant safety analyses. The proposed technical specification change does not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do the changes alter any assumptions or conditions in any of the plant accident analyses. Therefore, 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.



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(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 to relocate the existing Technical Specification requirements for the Incore Instrumentation System to the Updated Final Safety Analysis Report will not change the physical plant or the modes of plant operation defined in the Facility License. The 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 proposed changes are administrative in nature in that operating and surveillance requirements for the Incore Instrumentation System will be relocated from the Technical Specifications to the Updated Final Safety Analysis Report for St. Lucie Unit 1 and Unit 2. The ICI system is not used to actuate safety-related equipment, provide interlocks, or otherwise perform automatic plant control functions. The system is used to monitor core power distribution parameters whose limits do involve a margin of safety; however, the ICI system itself makes no contribution to that margin of safety, and the power distribution limits will not be changed by the proposed amendment. 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 above discussion and the supporting Evaluation of Technical Specification changes, FPL has determined that the proposed license amendment involves no significant hazards consideration.