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 AUTH.NAME AUTHOR AFFILIATION
 SAGER,D.A. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amends to licenses DPR-67 & NPF-16, deleting refs to automatic tester for containment personnel air lock from TS 4.6.1.3.

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February 22, 1995

L-95-040
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
Containment Air Lock Automatic Tester

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 changes are administrative in nature in that reference to an "automatic" containment air lock tester will be deleted from TS 4.6.1.3. It is requested that the proposed amendments, if approved, be issued by September 1, 1995, prior to the next scheduled refueling outage for St. Lucie Unit 2.

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

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.

ADD 1

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Containment Air Lock Automatic Tester

L-95-040
Page 2

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.

D.A. Sager
D. A. Sager

STATE OF FLORIDA
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 22nd day of February, 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 4-18-98
Commission No. CC 359926



SECRET
NOV 19 1954
U.S. DEPARTMENT OF THE ARMY
WASHINGTON, D.C.

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Containment Air Lock Automatic Tester

ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES

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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 delete references to the automatic tester for the containment personnel air lock. FPL has discontinued using the automatic leakage measurement systems and has no plans to use them in the future. The systems are not safety related and are scheduled for removal in accordance with approved plant procedures.

PSL1 and PSL2 Proposed Technical Specification (TS) Changes

TS 3/4.6.1.3 provides operability and surveillance requirements (SR) for the containment air locks and, in part, requires that seal leakage be determined by precision flow measurement when the volume between the door seals is pressurized to the specified pressure. Specifically, SR 4.6.1.3.a.1 states (PSL2 value in parenthesis):

"For the personnel air lock, greater than or equal to P_1 , 39.6 (41.8) psig for at least 15 minutes if not tested with the automatic tester."

For SR 4.6.1.3.a.1: Delete the words, "if not tested with the automatic tester"

Background

Approved plant procedures are used to perform air lock testing and include specific instructions for the use of a portable local leak rate (LLRT) cart, or the automatic leak rate tester, to check the integrity of the seals for personnel air lock inner and outer doors. Either test method is capable of demonstrating operability pursuant to SR 4.6.1.3.a.1.

Each PSL unit has an automatic tester that is designed as a dedicated system to automatically initiate a test sequence upon door closure, or by manual switch actuation. The system function is to pressurize the intra-seal volume to a preset pressure and

monitor the air flow necessary to maintain that pressure. All timing functions and calibration values for measuring leakage are user programmable. Leak test "trouble" alarms are actuated in the control room to annunciate a test failure and/or failure of the system to operate properly.

The same model automatic tester is installed at each PSL unit. The tester is not safety related, is not used to maintain air lock integrity, and the tubing installed to pressurize the intra-seal volume does not penetrate the containment atmosphere boundary.

Bases for the Proposed Changes

Persistent difficulties have been experienced with operation of the automatic testing systems for the containment personnel air locks for both St. Lucie Units 1 and 2. These operational difficulties include initiation of distracting "nuisance alarms" in the control rooms and, as a result, the systems are no longer used. FPL has no plans to use the automatic testers in the future, and has scheduled them for removal using approved plant configuration control procedures.

TS 3/4.6.1.3 specifies Limiting Conditions for Operation (LCO) for the Containment Air Locks. Surveillance testing of air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during the intervals between leakage tests. The required test intervals, test pressure, and leakage acceptance criteria are not being changed by the proposed license amendment. The containment personnel air lock automatic leak rate tester is only one method of verifying seal leakage. Automatic testing is not required to demonstrate operability of the air locks, or otherwise required to comply with the specifications of the LCO.

Conclusion

The proposed TS revision does not alter the operability requirements for the containment air locks; rather, only the reference to an automatic tester (which is not required for compliance with the test criteria) will be deleted. Therefore, FPL considers the proposed change to be administrative in nature.

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Containment Air Lock Automatic Tester

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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 amendment is administrative in nature in that the revision will eliminate the wording associated with optional use of the personnel airlock automatic leakage tester. The requirement for testing the personnel airlock at a pressure greater than or equal to P_1 for at least 15 minutes remains unchanged. The acceptance criteria of personnel airlock seal leakage less than $0.01 L_1$ is also unchanged. The automatic leakage tester 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 proposal does not involve any changes to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor does it alter any assumptions or conditions in the plant safety 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.

(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 remove the reference to the personnel airlock automatic tester from the technical specifications will not introduce any new failure modes or system interactions, nor will it

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Containment Air Lock Automatic Tester

L-95-040
Attachment 2
Page 2 of 2

require the installation of any new or modified equipment. The requirement to leak test the personnel air locks will not be changed. Thus, 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 amendment is administrative in nature in that it eliminates the reference to the personnel airlock automatic leakage tester but does not alter the surveillance and acceptance criteria for such testing. Seal leakage testing is performed in accordance with an approved plant procedure which allows use of either an automatic tester or a portable testing cart. The automatic leakage tester is not used to actuate safety related equipment, provide interlocks, or perform plant control functions. The conditions evaluated in the plant accident and transient analyses do not involve this tester. The proposed change does not alter the basis for any technical specification that is related to the establishment of, or the maintenance of, a nuclear safety margin. Therefore, operation of the facility in accordance with the proposed amendment does 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.