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 SAGER, D.A. Florida Power & Light Co.
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SUBJECT: Application for amends to licenses DPR-67 & NPF-16. Amends would incorporate line-item TS improvements to TSs 3/4.8.1 & 4.8.1.2.2.

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April 3, 1995

L-95-087
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
Emergency Diesel Generators; Change to
Testing Requirements per GL 93-05 and 94-01

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 amendments will incorporate line-item TS improvements to Specifications 3/4.8.1 "Electrical Power Systems-A.C. Sources," and 4.8.1.2.2 "Electrical Power Systems-Shutdown." The proposed changes are consistent with recommendations for Emergency Diesel Generator (EDG) Surveillance Requirements in NUREG-1366, and regulatory guidance provided in Generic Letter (GL) 93-05 and GL 94-01. This proposal also contains FPL's commitment to implement a maintenance program for monitoring and maintaining EDG performance for both St. Lucie Units consistent with 10 CFR 50.65 and the guidance of Regulatory Guide 1.160.

It is requested that the proposed amendments, if approved, be issued by September 1, 1995, to allow implementation during the next scheduled refueling outage for St. Lucie Unit 2.

One of the changes proposed in this submittal involves re-specifying the surveillance for the EDG "hot-start" test, which is required by the existing TS to be performed within 5-minutes of a 24-hour test run. FPL has determined that this change alone more than satisfies the threshold for Cost Beneficial Licensing Actions (CBLA) as described in NRC Administrative Letter AL 95-02. The estimated cost savings expected to result from this burden reduction over the remaining plant life, excluding the cost of replacement power, is in excess of three-hundred thousand dollars.

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.

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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.

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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.



D. A. Sager

STATE OF FLORIDA
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 3rd day of APRIL, 19 95 by D.A. Sager, who is personally known to me and who did take an oath.



KAREN WEST
Name of Notary Public

My Commission expires 4-18-98
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 incorporate line-item TS improvements to Specifications 3/4.8.1, "Electrical Power Systems-A.C. Sources", and 4.8.1.2.2, "Electrical Power Systems-Shutdown." The proposed changes are consistent with guidance provided in GL 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," and the corresponding recommendations contained in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," December, 1992.

In addition, line-item improvements are proposed following the guidance in GL 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators." A commitment to implement a maintenance program for monitoring and maintaining Emergency Diesel Generator (EDG) performance for both PSL units within 90 days following issuance of the proposed amendments, consistent with the provisions of 10 CFR 50.65 "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" and the associated guidance of Regulatory Guide 1.160, is contained in the Basis for Item 8 shown on page 6 of this attachment.

Background

As part of the NRC Technical Specification Improvement Program, NUREG-1366 reported the findings and recommendations of a comprehensive examination of surveillance requirements in TS that require testing during power operation. Certain recommendations from this study were designed to remove testing requirements which may be counter-productive to safety in terms of equipment degradation and availability, and were incorporated into the improved standard technical specifications (STS) issued by the NRC in September 1992. For plants that have TS in a format that is different than the STS, GL 93-05 provides guidance to assist licensees in preparing license amendment requests to implement

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recommendations contained in NUREG-1366 as line-item TS improvements. The proposed TS changes should be consistent with the intent of the NUREG recommendations, the guidance of GL 93-05, and the format of the individual plant TS.

Section 10.1 of NUREG-1366 and GL 93-05 includes the recommended improvements to Specifications for the Emergency Diesel Generators (EDG). Specifically,

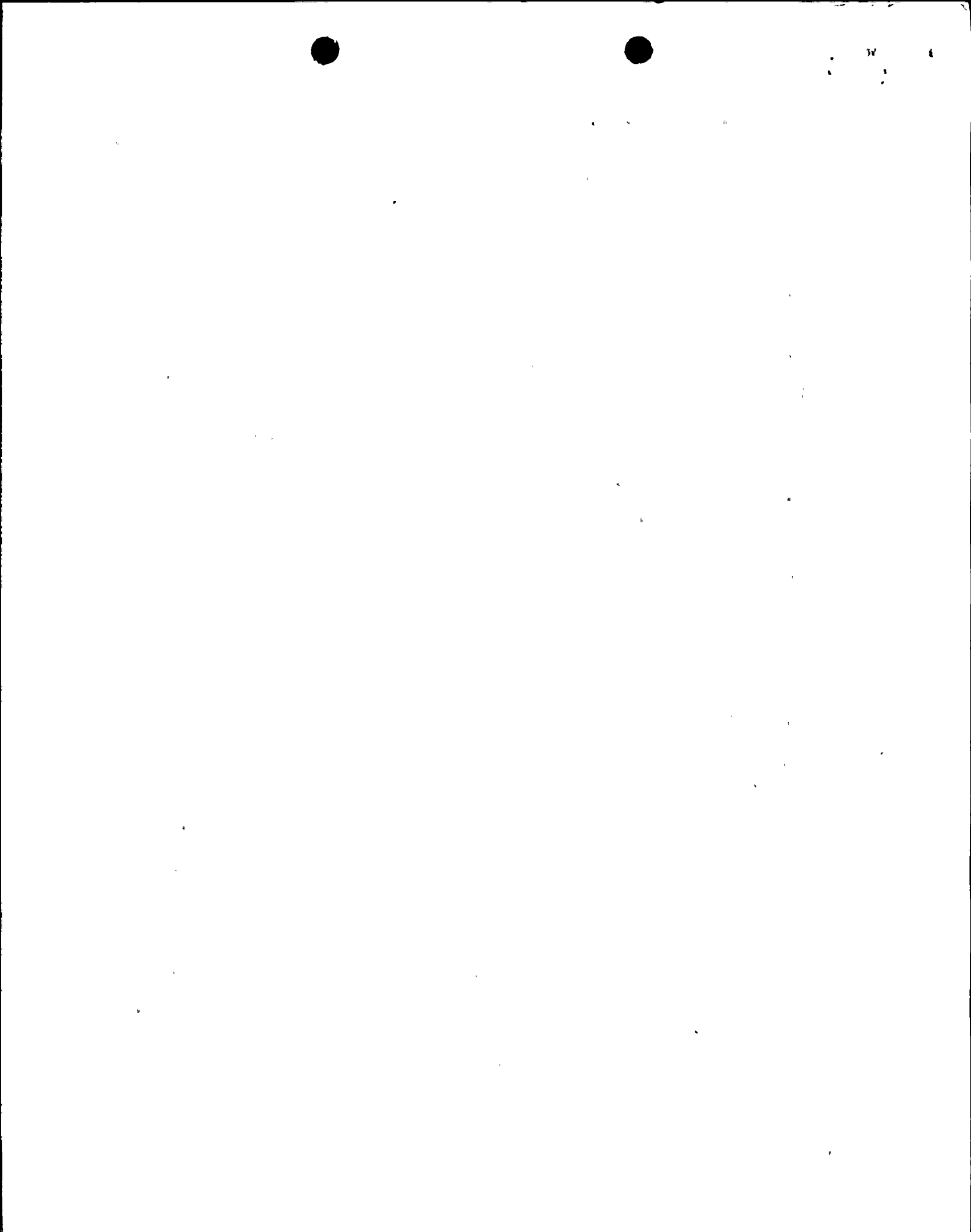
(1) When a EDG itself is inoperable (not including a support system or independently testable component), the other EDG(s) should be tested only once (not every 8 hours) and within 8 hours unless the absence of any potential common mode failure can be demonstrated.

(2) EDGs should be loaded in accordance with the vendor recommendations for all test purposes other than the refueling outage LOOP tests.

(3) The hot-start test following the 24-hour EDG test should be a simple EDG start test. If the hot-start test is not performed within 5 minutes following the 24-hour EDG test, it should not be necessary to repeat the 24-hour EDG test. The only requirement should be that the hot-start test is performed within 5 minutes of operating the diesel generator at its continuous rating for 2 hours or until operating temperatures have stabilized.

(4) Delete the requirement for alternate testing of EDGs and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG).

GL 94-01 provides guidance for a TS line-item improvement that was developed in response to an NRC decision on SECY-93-044, "Resolution of Generic Safety Issue B-56, 'Diesel Generator Reliability'." The GL states that, "The NRC staff determined that a commitment to implement a maintenance program for monitoring and maintaining EDG performance in accordance with the provisions of the maintenance rule and consistent with the guidance of RG 1.160 would provide a basis for the staff to approve a licensee request to remove the accelerated testing and special reporting



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requirements for EDGs from their plant TS." Specifically, accelerated testing requirements for EDGs which are based on the number of failures in the last 20 and 100 valid tests would be deleted, and reference to the applicable test schedule would be deleted from TS 4.8.1.1.2. In addition, EDG special reporting requirements would be deleted from the plant TS since 10 CFR 50.72 and 50.73 address the regulatory requirements for licensees to notify NRC and report individual EDG failures.

Proposed TS Changes and Justification/Bases

Unless otherwise indicated, the following proposed changes apply to both PSL1 and PSL2. Marked-up TS pages are contained in Attachment 3 (PSL1) and Attachment 4 (PSL2).

1. TS 3.8.1.1, ACTION a. "With one offsite circuit of 3.8.1.1.a inoperable,..." : DELETE the following requirement to test EDGs: "If either EDG has not been successfully tested within the past 24 hours, demonstrate its OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 separately for each such EDG within 24 hours."

BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (4).

2. TS 3.8.1.1 ACTION b. "With one diesel generator of 3.8.1.1.b inoperable,..." : REVISE the following requirement to test the remaining OPERABLE EDG, "and if the EDG became inoperable due to any cause other than preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours*;" TO READ,

"and if the EDG became inoperable due to any cause other than *an inoperable support system, an independently testable component, or* preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*;"

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BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (1). FPL's proposed wording has the same meaning as the generic example for this specification provided in GL 93-05, and is consistent with the syntax used in the Bases for corresponding Actions B.3.1 and B.3.2 shown in the STS for Combustion Engineering Plants (NUREG-1432).

3. Page 3/4 8-1, Footnote "*" : REVISE the footnote, "This test is required to be completed regardless of when the inoperable EDG is restored to OPERABILITY." TO READ,

"If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY."

BASIS: The proposed wording revises the footnote to clarify that, if the cause for inoperability of the faulty EDG has not been conclusively demonstrated to preclude the potential for a common-cause failure, the test for the remaining EDG is required even in those situations where the inoperable EDG is restored to an OPERABLE-status before the action specified in 3.8.1.1.b has been completed. Assurance is thereby maintained that a potential common-cause failure has not rendered the remaining EDG inoperable. The proposed revision is consistent with NUREG-1366 and GL 93-05 Section 10.1, Recommendation (1).

4. TS 3.8.1.1 ACTION c. "With one offsite A.C. circuit and one diesel generator inoperable,..." : REVISE the following requirement to test the remaining OPERABLE EDG, "and if the EDG became inoperable due to any cause other than preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours*." TO READ,

"and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG."*

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BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (1). FPL's proposed wording has the same meaning as the generic example provided in GL 93-05, and is consistent with the syntax used in the Bases for corresponding Actions B.3.1 and B.3.2 shown in the STS for Combustion Engineering Plants (NUREG-1432).

5. Page 3/4 8-2, Footnote "*" : REVISE the footnote, "This test is required to be completed regardless of when the inoperable EDG is restored to OPERABILITY." TO READ,

"If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY."

BASIS: The proposed wording revises the footnote to clarify that, if the cause for inoperability of the faulty EDG has not been conclusively demonstrated to preclude the potential for a common-cause failure, the test for the remaining EDG is required even in those situations where the inoperable EDG is restored to an OPERABLE status before the action specified in 3.8.1.1.b has been completed. Assurance is thereby maintained that a potential common-cause failure has not rendered the remaining EDG inoperable. The proposed revision is consistent with NUREG-1366 and GL 93-05 Section 10.1, Recommendation (1).

6. TS 3.8.1.1. ACTION d. "With two of the required offsite A.C. circuits inoperable,..." : DELETE the following requirement to test the EDGs: "demonstrate the OPERABILITY of two diesel generators by sequentially performing Surveillance Requirement 4.8.1.1.2.a.4 on both diesels within 8 hours, unless the diesel generators are already operating;"

BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (4).

7. TS 3.8.1.1 ACTION f. "With one Unit ... startup transformer ... inoperable,..." : DELETE the following requirement to test the EDGs, "If either EDG has not been successfully tested within the past 24 hours, demonstrate its OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 separately for each such EDG within 24 hours."

BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (4).

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8. SR 4.8.1.1.2.a, REVISE the specified frequency, "In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:" TO READ,

"At least once per 31 days on a STAGGERED TEST BASIS by:"

BASIS: Implementing the provisions of the maintenance rule for EDGs and the associated support systems that impact EDG availability will assure EDG performance. FPL hereby commits to implement within 90 days following issuance of the license amendments a maintenance program for monitoring and maintaining EDG performance consistent with the provisions of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants;" and the associated guidance of Regulatory Guide 1.160 for PSL1 and PSL2.

As stated in GL 94-01, "...the staff has concluded that it is not necessary to await the effective date of the maintenance rule to remove the associated TS requirements nor is it necessary to relocate accelerated testing requirements to the maintenance program." The proposed TS change is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.2"

9. SR 4.8.1.1.2.a.4 (PSL2 only): In the first line, replace the word "form" with the proper word, "*from*".

BASIS: Editorial change, e.g., correction of a spelling error.

10. SR 4.8.1.1.2.a.5, REVISE the requirement to load the generator "in less than or equal to 60 seconds***," TO READ,

"in accordance with the manufacturer's recommendations,".

BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (2).

NOTE: For PSL2 only, and as shown in Attachment 4, the triple asterisk will be relocated from its present position as superscript to the word "loaded" to the position of superscript to the load value "3685 kw", to be consistent with the corresponding PSL1 TS.



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11. Page 3/4 8-4, Footnote "****", DELETE the first two sentences, "Generator loading in less than or equal to 60 seconds shall be performed at least once every 184 days; timing for this loading test shall start upon the closing of the diesel generator breaker. All other loading for the purpose of this surveillance test may be performed according to manufacturer's recommendations."

BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (2).

12. Page 3/4 8-7 (PSL2 ONLY), TS 4.8.1.1.2.e.7, DELETE the last sentence, "Within 5 minutes after completing this 24 hour test, perform Surveillance Requirement 4.8.1.1.2e.4.b."

BASIS: As reported in Section 10.1 of NUREG-1366, failure to restart when hot, or extended delay in restarting, is typically only experienced with small forced-air-cooled diesel engines which, upon being tripped undergo a temperature rise transient. The PSL2 diesel engines are water cooled, and are normally maintained at hot standby conditions (heated cooling water and lubricating oil) following shutdown. Significant temperature rise transients have not been experienced following shutdown of the PSL EDGs.

The following specific finding is also reported in NUREG-1366, "There is no safety reason for performing a startup of a diesel within 5 minutes of the 24-hour test run as is required by Technical Specifications." In addition to the GL 93-05 recommendations, NUREG-1366 also states (following discussion of another utility's similar amendment request), "The NRC staff, therefore recommends that other utilities be permitted to change their Technical Specifications to separate the 24-hour test and the hot startup test if they propose doing so."

Based on the preceding discussion, and recognizing that potential refueling outage "critical path" flexibility would be provided, FPL proposes to re-specify the hot restart test requirement as the following Specification 4.8.1.1.2.e.13.

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13. Page 3/4 8-7a (PSL2 ONLY):

(a) ADD new Specification 4.8.1.1.2.e.13, *"Performing Surveillance Requirement 4.8.1.1.2a.4 within 5 minutes of shutting down the diesel generator after it has operated within a load band of 3450 kW to 3685 kW[#] for at least 2 hours or until operating temperatures have stabilized."*

(b) ADD new footnote, *"# This band is meant as guidance to avoid routine overloading of the engine. Variations in load in excess of this band due to changing bus loads shall not invalidate this test."*

BASIS: NUREG-1366, GL 93-05 Section 10.1, Recommendation (3).

14. SR 4.8.1.1.3, Reports: DELETE the specified reporting requirement and REPLACE with the words *"(Not used)"*

BASIS: GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.3." 10 CFR 50.72 and 50.73 address the remaining regulatory requirements for licensees to notify NRC and report individual EDG failures.

15. TABLE 4.8-1: REPLACE the content of TABLE 4.8-1 with the words, *"(Not used)"*

BASIS: GL 94-01, Enclosure 2, "Revisions to Table 4.8.1.1.2-1"

16. SR 4.8.1.2.2 Reports: DELETE this specification in its entirety.

BASIS: Deleting the entire section will not interrupt the TS numbering sequence, and removing the reporting requirement from the TS is consistent with GL 94-01, Enclosure 2, "Revisions to TS 4.8.1.1.3, 'Reports'." 10 CFR 50.72 and 50.73 address the remaining regulatory requirements for licensees to notify NRC and report individual EDG failures.

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17. Page B 3/4 8-1, 3/4.8 ELECTRICAL POWER SYSTEMS, BASES:

(a) ADD the following paragraph as indicated by "Insert -A" in Attachment 3 (PSL1) and Attachment 4 (PSL2):

"All EDG inoperabilities must be investigated for common-cause failures regardless of how long the EDG inoperability persists. When one diesel generator is inoperable, required ACTIONS 3.8.1.1.b and 3.8.1.1.c provide an allowance to avoid unnecessary testing of EDGs. If it can be determined that the cause of the inoperable EDG does not exist on the remaining OPERABLE EDG, then SR 4.8.1.1.2.a.4 does not have to be performed. Eight (8) hours is reasonable to confirm that the OPERABLE EDG is not affected by the same problem as the inoperable EDG. If it cannot otherwise be determined that the cause of the initial inoperable EDG does not exist on the remaining EDG, then satisfactory performance of SR 4.8.1.1.2.a.4 suffices to provide assurance of continued OPERABILITY of that EDG. If the cause of the initial inoperability exists on the remaining OPERABLE EDG, that EDG would also be declared inoperable upon discovery, and ACTION 3.8.1.1.e would be entered. Once the failure is repaired (on either EDG), the common-cause failure no longer exists."

(b) ADD the following to the last paragraph: "; as modified by Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993, and Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," dated May 31, 1994."

BASIS: The proposed additions are consistent with the existing Bases format, and will update the reasons for Specification 3/4.8 accounting for the changes requested in this submittal.

Conclusion

The proposed changes to the St. Lucie Unit 1 and Unit 2 Technical Specifications are consistent with the intent of the NUREG-1366 recommendations involving Emergency Diesel Generator Surveillance Requirements (PWR, BWR), the guidance of GL 93-05, the guidance of GL 94-01, and the existing format of the plant TS.

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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 license amendments proposed for St. Lucie Units 1 and 2 will incorporate line-item Technical Specification (TS) improvements for Emergency Diesel Generators (EDG) pursuant to guidance provided in Generic Letters (GL) 93-05 and 94-01. The EDGs are not accident initiators, the proposed TS changes do not involve any assumptions relative to accident initiators in the plant safety analyses, and therefore the proposed amendments will not impact the probability of occurrence for accidents previously analyzed.

The EDG line-item TS improvements associated with GL 93-05 are based on recommendations designed to remove unwarranted requirements for testing during power operation and other factors that are counter-productive to safety in terms of equipment degradation and availability. These recommendations resulted from a comprehensive study of industry-wide EDG surveillance requirements and subsequent findings reported by the NRC in NUREG-1366. The proposed amendments are consistent with the GL 93-05 guidance for implementing such recommendations.

Similarly, GL 94-01 provides guidance for a line-item TS improvement that will remove accelerated testing requirements from the TS provided that the licensee commits to a maintenance program for monitoring and maintaining EDG performance that includes the applicable provisions of the maintenance rule (10 CFR 50.65). Such a program will further assure EDG availability. Since the

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availability of EDGs is assumed in certain success paths for mitigating analyzed accidents, an improvement in EDG availability will enhance accident mitigation capabilities.

Therefore, operation of the facility in accordance with the proposed amendments 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 amendments incorporate line-item TS improvements to EDG surveillance testing requirements, and will not change the physical plant or the modes of plant operation defined in the Facility License. The changes do not involve the addition or modification of equipment, nor do they alter the design or methods of operation of plant systems. Plant configurations that are prohibited by TS will not be created by the amendments. 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 amendments are designed to improve EDG availability by eliminating unwarranted surveillance testing. The presently specified surveillance intervals are not changed. The proposed changes do not otherwise 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 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.