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 SAGER,D.A.      Florida Power & Light Co.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Application for amends to licenses DPR-67 & NPF-16 re administrative & conforming update.

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May 17, 1995

L-95-140  
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  
Administrative and Conforming Update

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 changes which are administrative in nature. The proposed amendments will improve consistency between the Technical Specifications and the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992) by incorporating changes in text and resolving other inconsistencies identified by the NRC and plant operations staff.

It is requested that the proposed amendments, if approved, be issued by May 31, 1996.

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/GRM

Attachments



ADD 1

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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

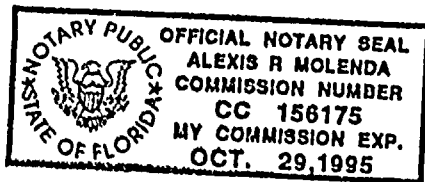
The foregoing instrument was acknowledged before

me this 17th day of May, 1995  
by D.A. Sager, who is personally known to me  
and who did take an oath.

*Alexis R. Molenda*  
Alexis R. Molenda  
Name of Notary Public

My Commission expires 10-29-95

Commission No. CC 156175



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ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES

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 the administrative improvements described herein. The proposed amendments will improve consistency between the Technical Specifications and the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992) by incorporating changes in text and resolving other inconsistencies identified by the NRC and plant operations staff.

Proposed TS Changes and Justifications

The following changes in text will improve consistency within the TS by updating, revising and/or deleting outdated material.

- (1) On Page 1-2: Under DEFINITIONS, "CORE ALTERATION," Section 1.9, Replace the current definition of core alteration with the definition from the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992) with minor clarifications. The new wording:

"CORE ALTERATION shall be the movement or manipulation of any fuel, sources, reactivity control components, lifting or lowering the upper guide structure (UGS), or other components affecting reactivity within the reactor vessel with the vessel head removed and fuel in the vessel. Shared (4 fingered) control element assemblies (CEAs) withdrawn into the UGS or evolutions performed with the UGS in place such as CEA latching/unlatching or verification of latching/unlatching are exceptions to the above and do not constitute a CORE ALTERATION. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position."

As such this is a conforming change to make the St. Lucie Technical Specification definition of Core Alteration consistent with the current NRC guidance in the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992). The changes included



incorporate specific exceptions to the core alteration definition that were previously reviewed and concurred with by the NRC in correspondence between D.G. Eisenhut and J.A. Olshinski, dated October 3, 1984 and November 7, 1984.

The NRC review and interpretation resulted from activities associated with the Spring 1984, Unit 1 refueling outage. During this outage individual control rods were mechanically latched and lifted for latch verification by weight measurement prior to installing the reactor vessel head. The rods were lifted with the upper guide structure (UGS) in place to ensure the magnetic jack was properly aligned and attached to the control element assembly (CEA). Alignment is verified by reaching a certain load on a crane cable mounted strain gauge. During this activity, the containment equipment hatch was open. The St. Lucie TS currently defines core alteration as the movement or manipulation of any component within the reactor vessel with the head removed and fuel in the vessel. The NRC reviewed the following interpretation of this definition and concurred with it as long as the work was clearly identified and controlled by adequate procedures.

The interpretation of this definition is that it refers to shuffling fuel or CEAs, or evolutions such as lifting/lowering the UGS, which could significantly affect reactivity or raise the possibility of damaging fuel. It must be noted that with refueling boron concentration and fuel in its final configuration, all CEAs could be withdrawn and k-effective would still be less than or equal to .95. With the UGS in place, fuel cannot be moved nor CEAs shuffled, and dropping of anything onto fuel is precluded by the UGS. Therefore, fuel assemblies cannot be damaged and components cannot be removed that would create a direct radiation hazard. Therefore, evolutions performed with the UGS in place, such as latching/unlatching CEAs or verification of mechanical latching/unlatching of CEAs do not constitute core alterations by the FPL interpretation of this definition.

The staff previously concluded this interpretation of the definition was based on sound engineering judgement. The NRC evaluation was based on: (1) the low probability for fuel damage; (2) the low potential for direct radiation hazard; and (3) the fact that this activity could not result in a significant reactivity change. The proposed change supports this interpretation and eliminates the need for an additional

clarification document. These clarifications were previously included in the plant "Conduct of Operations" Procedure.

- (2) On Page 6-1: Under RESPONSIBILITY, Section 6.1.2 is changed by replacing "President Nuclear Division" with "Site Vice President."

TS 6.1.2 requires the President-Nuclear Division to annually issue a management directive that emphasizes the primary management responsibility of the shift supervisor for safe operation of the plant under all conditions on his shift and that clearly establishes his command duties. This change assigns this responsibility to the St. Lucie Site Vice President which is consistent with the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992). The improved Standard TS (5.1.2) requires the annual directive to be signed by the highest level of corporate or site management. The St. Lucie Site Vice President is the highest level of site management. The TS for FPL's Turkey Point nuclear site requires the Turkey Point Site Vice President to sign this annual directive (Turkey Point TS amendments 137 and 132, dated August 28, 1990). This change provides for consistency between the St. Lucie and Turkey Point sites.

- (3) On Page 6-2: The proposed changes in text provide a conforming amendment which removes an apparent contradiction between St. Lucie TS 6.2.2.d, UNIT STAFF and 10 CFR 50.54(m)(2)(iv). The change replaces the existing TS wording with the wording from the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992). The new wording for Section 6.2.2.d is:

"Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS."

This item was identified as Unresolved Item (URI) 389/94-09-02, Adequacy of Single Operator on the Refueling Bridge During Core Alterations, in NRC inspection report 389/94-09 during the March, 1994, Unit 2 refueling outage. The current wording of TS 6.2.2.d. for Unit 1 was approved by Amendment 69 which was a large administrative amendment to make the administrative section 6 similar to the Unit 2 TS. The wording

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of the Unit 2 Section 6.2.2.d has been unchanged since original issue. Based on discussions between the NRC and FPL to resolve the above URI, FPL has changed the refueling procedures and committed to change TS 6.2.2.d to remove the apparent contradiction with the regulation. Since the proposed wording is consistent with the regulations and the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992) this change is considered to be a conforming amendment.

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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 amendments consist of administrative changes to the Technical Specifications (TS) for St. Lucie Units 1 and 2. The amendments will implement changes in text to improve consistency within the TS for each unit, the improved Combustion Engineering Standard Technical Specifications (NUREG-1432, dated September 1992), and the regulations. The proposed amendments do not involve changes to the configuration or method of operation of plant equipment that is used to mitigate the consequences of an accident, nor do the changes otherwise affect the initial conditions or conservatism assumed in any of the plant accident analyses. 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 administrative revisions will not change the physical plant or the modes of plant operation defined in the Facility License for each unit. The changes do not involve the addition or modification of equipment nor do they alter the design or operation of plant systems. Therefore, operation of the facility in accordance with the proposed amendments 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 administrative in nature and do not change the basis for any technical specification that is related to the establishment of, or the preservation of, a nuclear safety margin. Therefore, operation of the facility in accordance with the proposed amendments 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.