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SAGER, D.A. Florida Power & Light Co.
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SUBJECT: Application for amend to license NPF-16, modifying spec
3.6.6.1, Sheild Bldg ventilation sys to more effectively
address design functions performed by SBVS for Sheild bldg &
Fuel Handling Bldg. I
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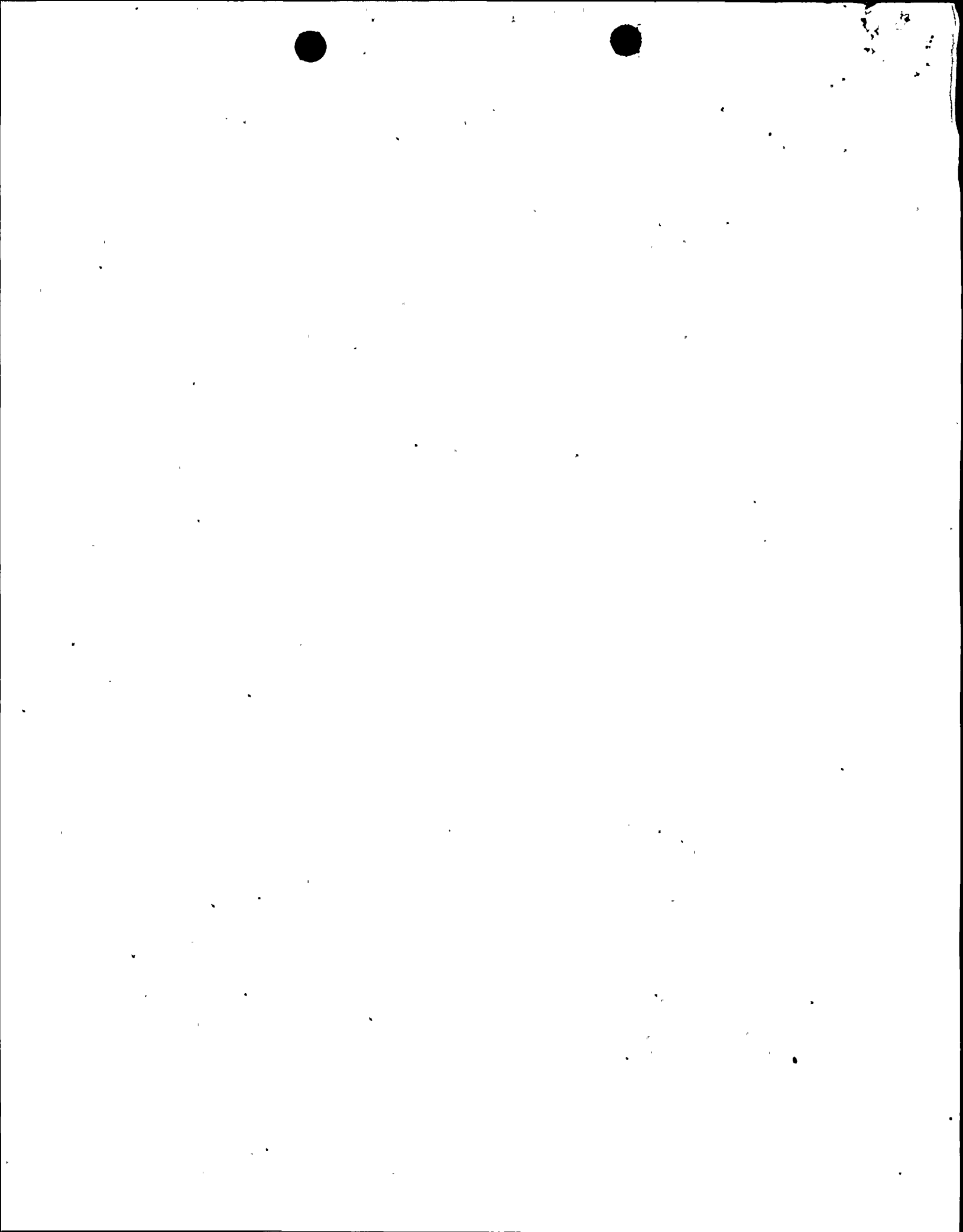
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FPL

Florida Power & Light Company, P.O. Box 128, Fort Pierce, FL 34954-0128

August 16, 1995

L-95-215
10 CFR 50.90

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

Re: St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment
Shield Building Ventilation System

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating License NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. The revisions will modify Specification 3.6.6.1, Shield Building Ventilation System (SBVS), to more effectively address the design functions performed by the SBVS for both the Shield Building (secondary containment) and the Fuel Handling Building. Accounting for plant specific differences, the proposed changes are consistent with NUREG-1432, Standard Technical Specifications for Combustion Engineering Plants.

It is requested that the proposed amendment, if approved, be issued by May 1, 1996.

Attachment 1 is an evaluation of the proposed TS changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachment 3 contains a copy of the appropriate TS pages marked-up to show the proposed changes.

The proposed amendment has been reviewed by the St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board. In accordance with 10 CFR 50.91 (b)(1), a copy of the proposed amendment is 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: See next page

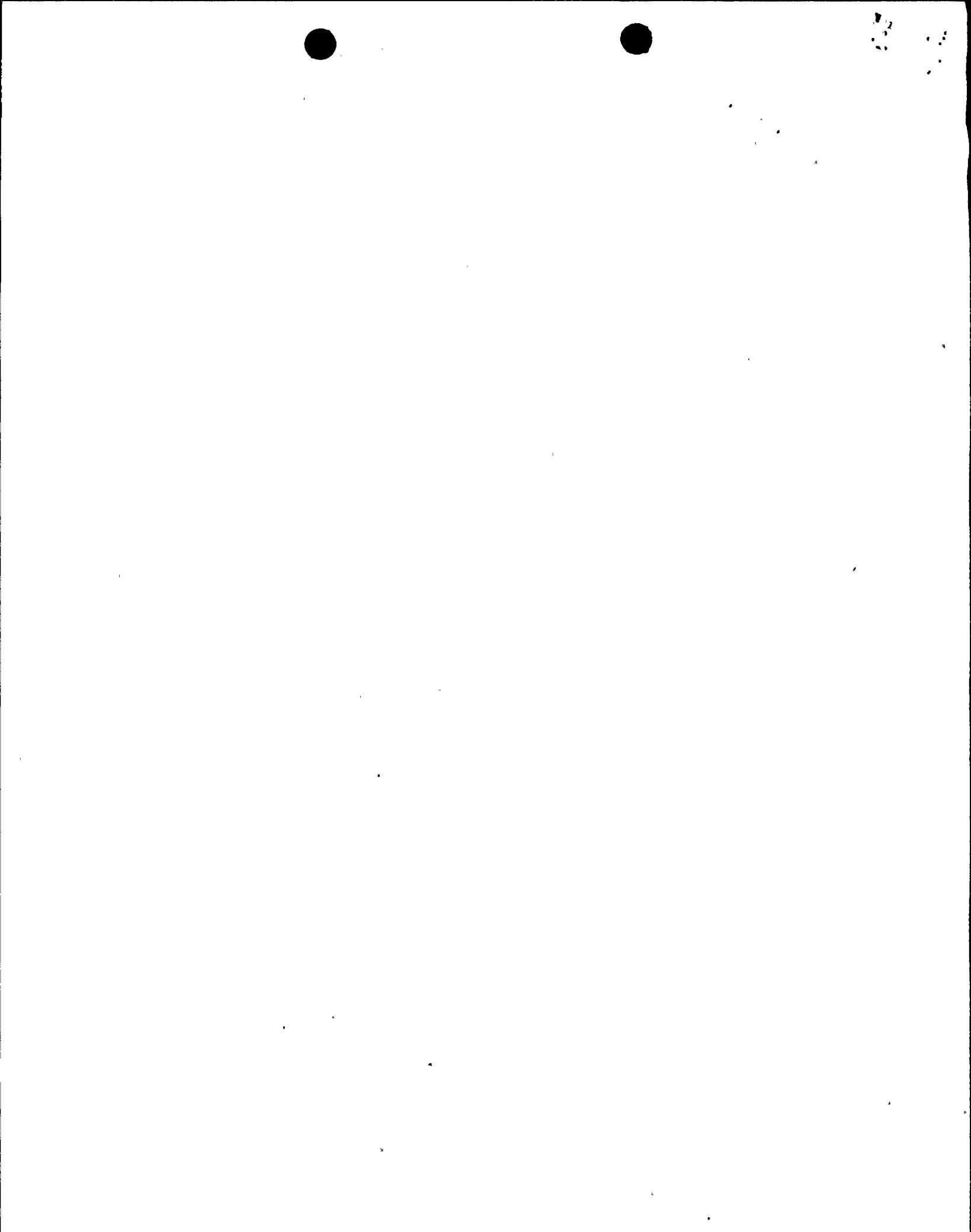
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cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC.
Senior Resident Inspector, USNRC, St. Lucie Plant.
Mr. W.A. Passetti, Florida Department of Health and
Rehabilitative Services.



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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.

D. A. Sager
D. A. Sager

STATE OF FLORIDA
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before

me this 16th day of August, 19 95

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. CC359926



KAREN WEST
MY COMMISSION # CC359926 EXPIRES
April 18, 1998
BONDED THRU TROY FAIR INSURANCE, INC.



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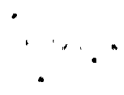
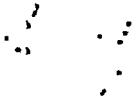
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St. Lucie Unit 2
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ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES



EVALUATION OF PROPOSED TS CHANGES

Introduction

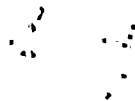
Florida Power and Light Company (FPL) proposes to revise the St. Lucie Unit 2 (PSL2) Technical Specifications (TS) for the Shield Building Ventilation System (SBVS). The changes will clarify the Applicability and the Actions required by TS 3.6.6.1, and explicitly account for the dual purpose of the SBVS to perform design functions for both the Shield Building (secondary containment) and the Fuel Handling Building. The proposed changes are consistent with the generic specifications of NUREG-1432, Standard Technical Specifications for Combustion Engineering Plants, as they apply to single systems that would perform the same two safety functions independently.

Background

The St. Lucie Unit 2 containment system consists of a free-standing steel primary containment, and a reinforced concrete shield building that encloses the primary containment. The SBVS, consisting of two independent, redundant, full-capacity fan and filter subsystems (trains), is designed to collect and filter radioactive airborne fission products that may leak from the primary containment to the annulus formed by these structures in the event of a Loss of Coolant Accident (LOCA). Upon receipt of a Containment Isolation Actuation Signal (CIAS), the SBVS will automatically actuate to perform the fission product removal function that is assumed for the postulated LOCA. The system must be OPERABLE, but is not operating during normal operation of the plant.

Each train of the SBVS is also connected, via normally closed motor-operated butterfly valves, to the corresponding exhaust duct for the Fuel Handling Building Ventilation System (FHBVS). Upon receipt of a high radiation signal from the spent fuel storage pool area, the normally operating FHBVS will automatically de-energize and appropriate isolation dampers will close, the FHBVS-to-SBVS cross-tie valves will open, and the SBVS will automatically actuate to evacuate and filter air from the spent fuel storage pool area. The SBVS thereby provides the fission product removal function that is assumed for the postulated fuel handling accident.

To limit offsite radiation exposures that could result from either a LOCA or a fuel handling accident, assuming single active failure criteria, Limiting Condition for Operation (LCO) 3.6.6.1 requires two independent SBVS to be OPERABLE during "MODES 1, 2, 3, 4, 5, and 6 with operations involving movement of irradiated fuel



within the spent fuel storage pool or crane operations with loads over the spent fuel storage pool with irradiated fuel in the spent fuel storage pool." The LCO provides an ACTION statement for the case of a single inoperable SBVS in MODES 1, 2, 3, and 4, and another ACTION statement for a single inoperable SBVS in MODES 5 and 6.

Description and Analysis of Proposed Changes

Marked-up copies of the applicable TS pages are contained in Attachment 3 to this submittal.

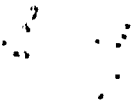
TS 3.6.6.1, Shield Building Ventilation System:

1. The existing single statement of APPLICABILITY is rewritten as two distinct statements to explicitly reflect the separate, but overlapping plant conditions that require an OPERABLE SBVS:

*"At all times during MODES 1, 2, 3, and 4.
During movement of irradiated fuel assemblies or during crane operations
with loads over irradiated fuel assemblies in the Spent Fuel Storage Pool
in MODES 1, 2, 3, 4, 5, and 6."*

Basis: The existing statement of applicability is a single run-on sentence that creates ambiguity, and could result in misinterpretation of the plant conditions that require the availability of an OPERABLE SBVS. The proposed change clearly relates that LCO 3.6.6.1 is applicable at all times during operational MODES 1, 2, 3, and 4, and thereby assures that SBVS operability assumptions used in the safety analyses to determine the site boundary radiation doses in the event of a LOCA remain valid. The second statement of applicability clearly relates that conditions in the Fuel Handling Building that would make a fuel handling accident a credible event are not mode-specific, and that LCO 3.6.6.1 is applicable whenever those conditions exist. Therefore, the proposed change also provides assurance that SBVS operability assumptions used in the fuel handling accident analysis to determine the radioactive effluent release to the environment remain valid.

The proposed change to LCO 3.6.6.1 APPLICABILITY, accounting for plant specific differences, is consistent with NUREG-1432, LCO 3.6.13, "Shield Building Exhaust Cleanup System (SBEACS)(Dual)" and LCO 3.7.14, "Fuel Building Air Cleanup System (FBACS)."



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2. The existing ACTION statements for an inoperable SBVS will be deleted and replaced with the following:

- "ACTION:
- a. *With the SBVS inoperable solely due to loss of the SBVS capability to provide design basis filtered air evacuation from the Spent Fuel Pool area, only ACTION-c is required. If the SBVS is inoperable for any other reason, concurrently implement ACTION-b and ACTION-c.*

 - b. *(1) With one SBVS inoperable in MODE 1, 2, 3, or 4, restore the inoperable system to OPERABLE status within 7 days; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.*

(2) With both SBVS inoperable in MODE 1, 2, 3, or 4, immediately enter LCO 3.0.3."

 - c. *(1) With one SBVS inoperable in any MODE, restore the inoperable system to OPERABLE status within 7 days; otherwise, suspend movement of irradiated fuel assemblies within the Spent Fuel Storage Pool and crane operations with loads over irradiated fuel in the Spent Fuel Storage Pool.*

(2) With both SBVS inoperable in any MODE, immediately suspend movement of irradiated fuel assemblies within the Spent Fuel Storage Pool and crane operations with loads over irradiated fuel in the Spent Fuel Storage Pool.

Basis: The SBVS has two separate and distinct nuclear safety functions: (1) to mitigate the effects of a LOCA by exhausting filtered air from the Shield Building, and (2) to mitigate the effects of a fuel handling accident by exhausting filtered air from the Fuel Handling Building. OPERABILITY is demonstrated, in part, by surveillances that require the SBVS to develop a specified "negative pressure" in the area to be exhausted.

The existing ACTIONS provided by LCO 3.6.6.1 are stated for the condition where one SBVS (train) is inoperable in either "MODES 1, 2, 3, and 4," or "MODES 5 and 6." The former ACTION requires a unit transition to COLD SHUTDOWN if the inoperable SBVS train is not restored to OPERABLE status within 7 days. This action is appropriate for a condition where the SBVS is unable to perform its design safety function for mitigating the effects of a LOCA. However, the specified action provides no compensatory measures for the probable concurrent condition where the SBVS can not perform its design safety function for mitigating a fuel handling accident. Moreover, should a condition develop in the Fuel Handling Building during MODES 1, 2, 3, or 4 that impacts only the SBVS capability to mitigate a fuel handling accident, such as opening the spent fuel cask shield door, the specified ACTION could result in an unwarranted unit shutdown and cooldown in addition to not requiring the proper compensatory measures until entering MODE 5.

The proposed ACTION-a distinguishes between the compensatory actions required for the condition where only the SBVS capability to perform the fuel handling accident safety function is affected, and the case where both the fuel handling accident and the LOCA safety functions are affected. Considering the narrative format and existing structure of the PSL2 Technical Specifications, this Action statement is necessary to provide clear direction to facility operators that concurrent entry into the two independently stated reference Actions (b and c) within this same LCO is permissible, and depending upon the scope of SBVS inoperability, may or may not be required.

The proposed ACTION-b does not change the previously approved compensatory measures or the action completion times stated for "MODES 1, 2, 3, and 4" in the existing PSL2 Specification, and assures availability of the LOCA mitigation safety function consistent with the plant safety analyses. This Action is also consistent with NUREG-1432, LCO 3.6.13, "Shield Building Exhaust Cleanup System (SBEACS)(Dual)"

The proposed ACTION-c is consistent with the previously approved compensatory measures stated for "MODES 5 and 6" in the existing PSL2 Specification, but clarifies that the compensatory measures are mode independent. The Action completion times are compatible with those stated in Action-b, and assure availability of the fuel handling accident safety function consistent with the plant safety analyses. Action-c, is also consistent with NUREG-1432, LCO 3.7.14, "Fuel Building Air Cleanup System (FBACS)."

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Conclusion

The proposed changes are consistent with the format and content of the current PSL2 Technical Specifications as well as the technical substance of the corresponding Specifications in NUREG-1432. By distinguishing between the conditions where (1) the cause of SBVS inoperability impacts the ability to provide both the LOCA and fuel handling accident mitigation safety functions, and (2) the cause of inoperability impacts only the fuel handling accident mitigation safety function, the proposed actions provide assurance that the proper compensatory measures will be taken in the event one or both SBVS trains become inoperable. The changes more clearly identify the conditions for LCO Applicability and implementation of the stated Actions, and do not prescribe operability requirements different from the existing TS 3.6.6.1. Therefore, FPL considers the proposed amendment to be administrative in nature.

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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 license amendment for St. Lucie Unit 2 will clarify the Applicability and the Actions required by Technical Specification (TS) 3.6.6.1, and explicitly account for the dual purpose of the Shield Building Ventilation System (SBVS) to perform design functions for both the Shield Building (secondary containment) and the Fuel Handling Building. The proposed amendment is administrative in nature.

The SBVS only operates when actuated by automatic control signals generated by systems detecting postulated accident conditions. The SBVS is not an accident initiator, the proposed TS changes do not involve any assumptions relative to accident initiators used in the plant safety analyses, and the amendment, therefore, will not impact the probability of occurrence for accidents previously analyzed. Relative to accident consequences, at least one train of the SBVS must operate to fulfill the design function of evacuating filtered air from the Shield Building during the postulated Loss of Coolant Accident; and likewise assumed in the analysis for the Fuel Handling Building during a fuel handling accident. The proposed changes simply remove elements of ambiguity from TS 3.6.6.1; do not reduce the existing operability requirements for the system; and provide further assurance that proper compensatory measures will be taken in the event one or both SBVS trains become inoperable.

Therefore, operation of the facility in accordance with the proposed amendment will 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 is administrative in nature 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 this amendment. 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 amendment will not change the SBVS operability requirements nor otherwise alter the basis for any technical specification that is related to the establishment of, or the maintenance of, a nuclear safety margin. The proposed changes are administrative in nature, and are designed to provide assurance that the SBVS capability to perform design functions assumed available in the safety analyses will remain available during the various plant operating modes. 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 discussion presented above and on the supporting Evaluation of Proposed TS Changes, FPL has concluded that this proposed license amendment involves no significant hazards consideration.

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ATTACHMENT 3

ST. LUCIE UNIT 2 MARKED-UP TECHNICAL SPECIFICATION PAGES

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Insert - A