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AUTH. NAME    AUTHOR AFFILIATION  
SAGER, D.A.    Florida Power & Light Co.  
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SUBJECT: Application for amends to licenses DPR-67 & NPF-16 revising TS 3.5.3 to rectify discrepancy for each St Lucie Unit & to provide assurance that admin controls for HPSIP remain effective in lower operational modes,

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**FPL**

January 4, 1996

L-95-327  
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  
ECCS SUBSYSTEMS - SHUTDOWN

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 revisions rectify a discrepancy in Specification 3.5.3 for each St. Lucie unit, and provide assurance that administrative controls for High Pressure Safety Injection pumps remain effective in the lower operational modes. It is requested that the proposed amendments, if approved, be issued by April 1, 1996, prior to the next Unit 1 refueling outage.

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 and corresponding Bases 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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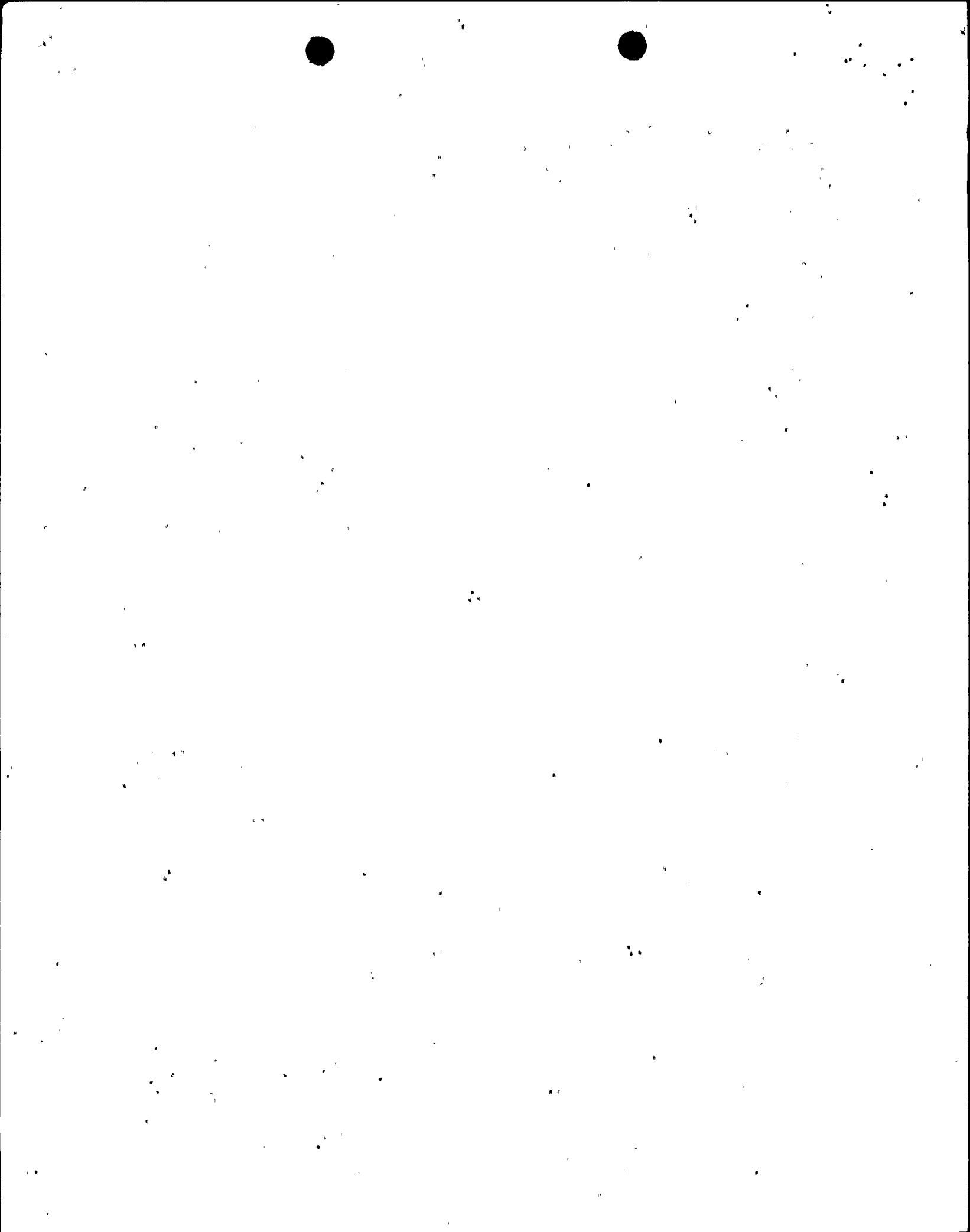
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DAS/RLD

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.

*D.A. Sager*  
D. A. Sager

STATE OF FLORIDA  
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before

me this 4<sup>th</sup> 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 4-18-98

Commission No. CC 359926



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



St. Lucie Unit 1 and 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) 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 amended to revise the Technical Specifications (TS) involving Emergency Core Cooling System (ECCS) subsystems during shutdown. The proposed amendments will change the APPLICABILITY statement for TS 3.5.3 to be consistent with the administrative controls on High Pressure Safety Injection (HPSI) pumps that were implemented to assure adequate Low Temperature Overpressure Protection (LTOP) at each St. Lucie unit. The changes consist of extending the stated APPLICABILITY to the lower operational modes and thereby assure that the technical requirements located within the LCO remain effective for the entire LTOP range.

### Background

Technical Specification 3.5.3 provides the limiting conditions for operation (LCO) for ECCS subsystems during shutdown.

PSL1: The LTOP range is defined in Specification 1.16, and includes all RCS temperatures  $\leq 304$  °F (during heatup) or  $\leq 281$  °F (during cooldown), when the RCS has pressure boundary integrity. To provide assurance that assumptions used in the analysis for low temperature overpressure mitigation remain valid, certain restrictions on HPSI pump operability are established in LCO 3.5.3. Specification 3.5.3.b allows a maximum of only one HPSI pump to be OPERABLE prior to decreasing the Reactor Coolant System (RCS) temperature below 270 °F. Specification 3.5.3.c requires that all HPSI pumps be disabled prior to decreasing the RCS temperature below 236 °F.

PSL2: The LTOP range is defined in Specification 1.16, and includes all RCS temperatures  $\leq 247$  °F (during heatup) and  $\leq 230$  °F (during cooldown), when the RCS is not vented to containment by an opening of at least 3.58 square inches. Similar to PSL1, a restriction on HPSI pump operability is established in LCO 3.5.3 to assure that assumptions used in the analysis for low temperature





overpressure mitigation remain valid. A footnote (#) is appended to the LCO that requires one HPSI pump to be rendered inoperable prior to entering MODE 5.

PSL1 and PSL2 Proposed Technical Specification (TS) Changes

Copies of the applicable TS pages and corresponding Bases pages are contained in Attachments 3 and 4 to this submittal.

For PSL1, LCO 3.5.3: The APPLICABILITY statement is revised to read,

*MODES 3\* and 4.  
MODES 5 and 6 when the Pressurizer manway cover is  
in place and the reactor vessel head is on.*

For PSL2, LCO 3.5.3: The following statement is added to the APPLICABILITY statement,

*Footnote # shall remain applicable in MODES 5 and 6  
when the Pressurizer manway cover is in place and  
the reactor vessel head is on.*

The Bases section which discusses HPSI pump operability limitations in the LTOP range is also updated by adding a summary statement.

Bases for the Proposed Changes

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which operational MODES or other specified conditions) conformance to an LCO is required for safe operation of the facility.

In the case of Specification 3.5.3, conditions within the LCO provide restrictions on HPSI pump operability that were established as administrative controls to limit the potential for a low temperature overpressure transient, and preserve the validity of assumptions used in the low temperature overpressure analysis for each St. Lucie unit. However, the APPLICABILITY statement does not include the full range of operational modes and conditions that require these restrictions, e.g., the LTOP range includes MODES 5 and 6. This inconsistency creates an ambivalent specification in

that the APPLICABILITY statement is in conflict with the technical requirements within the LCO, as well as the LTOP safety analysis.

The proposed revision to the APPLICABILITY statement for Specification 3.5.3 clearly shows that conformance to the LCO is required for plant conditions that cover the entire LTOP range, including MODES 5 and 6 when the Pressurizer manway cover is in place and the reactor vessel head is on. LTOP events from the use of HPSI pumps when the Pressurizer manway cover or the reactor vessel head is removed are not credible. Thus, assurance is provided that the effectiveness of administrative controls established in the LCO to limit the number of OPERABLE HPSI pumps will not be diminished.

#### Conclusion

The proposed revision to Specification 3.5.3 for each St. Lucie unit rectifies an error in the APPLICABILITY statement. The ECCS subsystem limiting conditions for operation remain the same as previously approved. Therefore, FPL considers the proposed amendment to be an administrative change.



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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 amendment proposed for each St. Lucie Unit (1 and 2) rectifies an error in the Applicability statement for Technical Specification 3.5.3, which provides limiting conditions for operation (LCO) for the Emergency Core Cooling System (ECCS) subsystems during plant shutdown. The revision is administrative in nature and does not change the technical requirements within the LCO that are established to assure a minimum functional capability required of the ECCS systems to mitigate analyzed transients. Rather, the revision provides assurance that the effectiveness of certain administrative controls, established to restrict the number of operable HPSI pumps during shutdown, will not be diminished by a misinterpretation of the modes and conditions for which the LCO must apply.

This proposal does not create any accident initiators, nor does it change the availability or method of operation of equipment that is assumed to function in the success path(s) for mitigating accidents evaluated in the plant safety analyses. Therefore, operation of either facility in accordance with its 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 administrative change to the LCO 3.5.3 Applicability statement for each St. Lucie unit will not change the physical plant or the modes of plant operation defined in the Facility License. The revision does not involve the addition or modification of equipment, nor does it alter the design or operation of plant systems. Therefore, operation of either facility in accordance with its 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 involves an administrative change to LCO 3.5.3 for each St. Lucie unit, which applies to the ECCS subsystems during the plant shutdown modes. The revision rectifies a discrepancy in the Applicability statement, and thereby provides assurance that the effectiveness of administrative controls established within the LCO to limit the number of operable High Pressure Safety Injection pumps during the shutdown modes will not be diminished. The changes do 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 either facility in accordance with its 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 amendments involve no significant hazards consideration.