

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments- Revised

L-96-184

ATTACHMENT 1

REVISED TS CHANGE

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Mark-up of the definition for core alteration as originally submitted to the NRC.

1.9 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. Exceptions to the above include shared (4 fingered) control element assemblies (CEA) withdrawn into the ~~upper guide structure (UGS)~~ or evolutions performed with the UGS in place such as CEA latching/unlatching or verification of latching/unlatching which do not constitute a CORE ALTERATION. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

Revised definition of core alteration as requested by the NRC.

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 Exceptions to the above include shared (4 fingered) control element assemblies (CEA) withdrawn into the upper guide structure (UGS) or evolutions performed with the UGS in place such as CEA latching/unlatching or verification of latching/unlatching which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

Basis for change.

The revised definition for core alteration proposed by FPL (L-95-140) classified the lifting or lowering of the upper guide structure as a core alteration based on wording in the existing facility Technical Specifications. However, the Standard Technical Specifications for Combustion Engineering Plants (STS), NUREG 1432 - Revision 1, excludes the UGS from the core alteration generic definition. Although the proposed definition could be approved, the NRC requested FPL to consider eliminating the additional limitation to be more consistent with the STS.

The exceptions allowed for 4 fingered CEAs withdrawn into the UGS and the latching/unlatching or verification of CEA latching/unlatching are acceptable deviations allowed by the generic STS to account for plant specific design. These differences were incorporated into the definition to resolve site specific concerns raised by individual NRC inspectors during previous refueling outages and clarified through correspondence with the NRC.



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