

CATEGORY 1

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FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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STALL, J.A. Florida Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Requests approval, prior to implementation of change to plant C
REP. Attachment to ltr compares current threshold for unusual A
event declaration for RCS leakage to proposed & includes T
util justification for proposed change. E

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July 25, 1996

L-96-192
10 CFR §50.54(q)

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

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed Change to Emergency Plan Table 3-1: Classification of Emergencies

Pursuant to Title 10 Code of Federal Regulations (CFR) §50.54(q), Florida Power & Light Company (FPL) requests approval, prior to implementation, of a change to the St. Lucie Plant Radiological Emergency Plan.

The proposed change revises the declaration threshold for the Emergency Action Level of an Unusual Event involving reactor coolant system (RCS) leakage. The attachment to this letter compares the current threshold for an Unusual Event declaration for RCS leakage to that proposed and includes FPL's justification for the proposed change.

The proposed change was reviewed by the St. Lucie Plant Facility Review Group on July 11, 1996. On receipt of approval from the NRC of the proposed change, FPL will revise the St. Lucie Plant Emergency Plan and Emergency Plan Implementing Procedure No. 3100022E to implement the revised Unusual Event declaration threshold.

If you have any questions, please contact Mr. Ed Weinkam at 561-467-7162.

Sincerely,

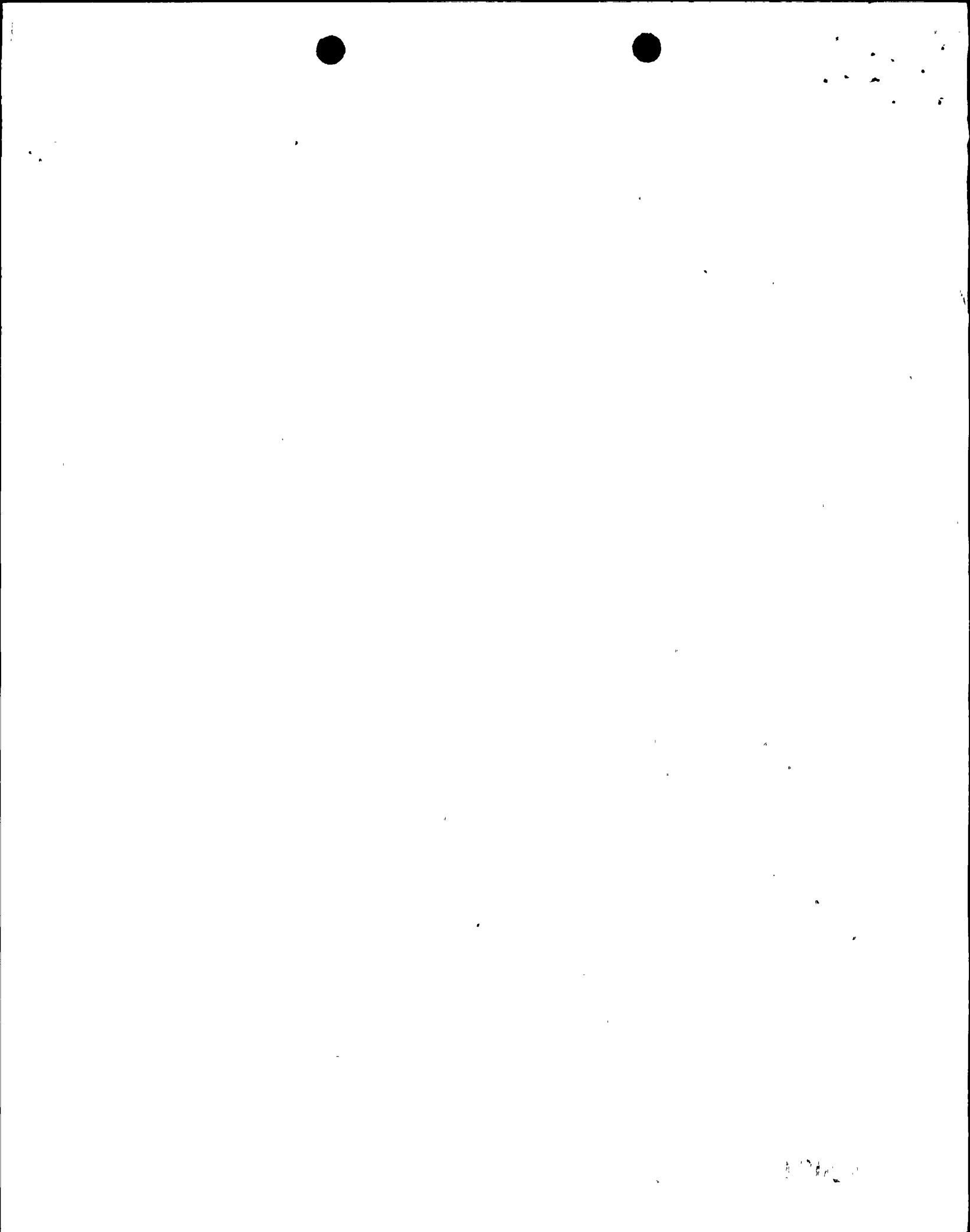
J. A. Stall
Vice President
St. Lucie Nuclear Plant

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, USNRC Region II (2 copies)
Senior Resident Inspector, USNRC, St. Lucie Plant

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L-96-192
Attachment

**Proposed Change to St. Lucie Plant
Emergency Plan Table 3-1:
Classification of Emergencies**

Current Emergency Action Level

St. Lucie Plant Emergency Plan Table 3-1: Classification of Emergencies

EVENT/CLASS

1.A. ABNORMAL PRIMARY LEAK RATE, UNUSUAL EVENT

RCS leakage GREATER THAN allowed by Technical Specifications

1. RCS water inventory balance indicates:
 - a. greater than 1 gpm unidentified leakage.
 - OR
 - b. greater than 10 gpm identified leakage.

OR

2. Inspection reveals any RCS pressure boundary leakage.

OR

3. Indication of leaking RCS safety or relief valve which causes RCS pressure to drop below 1600 psia.

L-96-192
Attachment

**Proposed Change to St. Lucie Plant
Emergency Plan Table 3-1:
Classification of Emergencies**

Proposed Emergency Action Level

St. Lucie Plant Emergency Plan Table 3-1: Classification of Emergencies

EVENT/CLASS

1.A. ABNORMAL PRIMARY LEAK RATE, UNUSUAL EVENT

RCS Leakage

1. RCS leakage GREATER THAN 10 GPM as indicated by:
 - a. control room observation,
OR
 - b. inventory balance calculation,
OR
 - c. field observation
OR
 - d. Emergency Coordinator judgement.

OR

2. Indication of leaking RCS safety or relief valve which causes RCS pressure to drop below 1600 psia.

**Proposed Change to St. Lucie Plant
Emergency Plan Table 3-1:
Classification of Emergencies**

Justification for Proposed Change

Background

Current initiating conditions (threshold values) in the St. Lucie Emergency Action Levels for declaring an Unusual Event involving Abnormal Primary Leak Rate are 1 gallon per minute (gpm) for unidentified reactor coolant system (RCS) leakage and 10 gpm for identified RCS leakage. The proposed change would incorporate, in part, the threshold values for RCS leakage of the Nuclear Management and Resources Council (now the Nuclear Energy Institute {NEI}) document NUMARC/NESP-007 classification scheme currently approved as part of Regulatory Guide 1.101.

Discussion

As discussed in the NUMARC/NESP-007 technical bases, a 10 gpm threshold for unidentified or pressure boundary leakage was chosen since it is observable using normal control room indications. Lesser values of RCS unidentified or pressure boundary leakage must generally be confirmed through time-consuming surveillance tests (e.g., RCS mass inventory balance).

FPL has elected to establish a single threshold value for RCS leakage (i.e., either identified or unidentified) independent of location. This change in initiating conditions will allow for prompt classification based on control room observation eliminating the time consuming need for the control room operators to differentiate between identified and unidentified RCS leakage in their decision-making process for an emergency declaration.

Conclusion

FPL has concluded that the proposed change will improve overall emergency response capability. The 10 gpm threshold for RCS leakage is sufficiently low to provide early indication of an emergency condition and while consistently remaining within the licensing and technical assumptions for the progression of more significant emergency declarations.

The criteria for declaration of an Alert, Site Area Emergency, or General Emergency for RCS leakage will remain unchanged.