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AUTH.NAME AUTHOR AFFILIATION
STALL,J.A. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amend to license DPR-67, requesting mod for selected cycle-specific reactor physics parameters to refer to COLR for limiting values.

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

FPL

December 9, 1996

L-96-298
10 CFR 50.90

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

Re: St. Lucie Unit 1
Docket No. 50-335
Proposed License Amendment
Core Operating Limits Report (COLR)

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating License DPR-67 for St. Lucie Unit 1 by incorporating the attached Technical Specifications (TS) revisions. The amendment will modify specifications for selected cycle-specific reactor physics parameters to refer to the St. Lucie Unit 1 Core Operating Limits Report (COLR) for limiting values. Minor administrative changes are also included. The proposed TS changes conform to the guidance provided in Generic Letter 88-16 and are consistent with the Standard Technical Specifications for Combustion Engineering Plants (NUREG-1432, Revision 1).

It is requested that the proposed amendment, if approved, be issued prior to completion of the current operating Cycle 14, which is scheduled to be completed in October, 1997.

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 affected TS pages marked-up to show the proposed changes. Enclosed is a copy of "St. Lucie Unit 1, Cycle 14 Core Operating Limits Report."

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,

J. A. Stall
Vice President
St. Lucie Plant

120083

JAS/RLD

Attachments

Enclosure: St. Lucie Unit 1, Cycle 14 Core Operating Limits Report, Revision 0.

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

STATE OF FLORIDA)
) ss.
COUNTY OF ST. LUCIE)

J. A. Stall 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.

J. A. Stall

STATE OF FLORIDA

COUNTY OF ST. LUCIE

Sworn to and subscribed before me

this 9 day of December, 1996

by J. A. Stall, who is personally known to me.

Karen West

Signature of Notary Public-State of Florida

KAREN WEST
MY COMMISSION # CC359926 EXPIRES
April 16, 1998
BONDED THRU TROY FAIN INSURANCE, INC.

KAREN WEST

Name of Notary Public (Print, Type, or Stamp)

St. Lucie Unit 1
Docket No. 50-335
Proposed License Amendment
Core Operating Limits Report (COLR)

ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES

EVALUATION OF PROPOSED TS CHANGES

Introduction

The proposed amendment to Facility Operating License DPR-67 for St. Lucie Unit 1 (PSL1) will modify specifications for selected cycle-specific reactor physics parameters to refer to the St. Lucie Unit 1 Core Operating Limits Report (COLR) for limiting values. Minor administrative changes are also included. The proposed Technical Specification (TS) changes conform to the guidance provided in Generic Letter 88-16 and are consistent with the Standard Technical Specifications for Combustion Engineering Plants (NUREG-1432, Revision 1).

Background

A number of TS address limits associated with reactor physics parameters that are subject to change as a function of reload core design. The methodology for determining such limits for cycle-specific parameters is typically documented in an NRC approved Topical Report or in a plant-specific submittal. As a consequence, the NRC review of proposed changes to these limits is primarily restricted to confirmation that the updated limits are calculated using an NRC approved methodology and are consistent with all applicable limits of the safety analyses. In order to eliminate the burden that is associated with the process for requesting, reviewing, and approving a license amendment to implement changes to cycle-specific parameter limits, Generic Letter (GL) 88-16 encouraged licensees to propose changes to their technical specifications (TS) that are consistent with the guidance provided in that letter.

Three separate actions to modify the plant's TS are discussed in GL 88-16: (1) adding a definition of a named formal report, e.g., COLR, that includes the values of cycle-specific parameter limits that have been established using an NRC approved methodology and are consistent with all applicable limits of the safety analyses, (2) the addition of an administrative reporting requirement to submit the formal report to the Commission for information, and (3) the modification of individual TS to note that cycle-specific parameters shall be maintained within the limits provided in the defined formal report. The NRC staff noted that it is essential to safety that the plant is operated within the bounds of cycle-specific parameter limits and that a requirement to maintain the plant within the appropriate bounds must be retained in the TS. However, the specific values of these limits may be modified by licensees, without affecting nuclear safety, provided that these changes are determined using an NRC approved methodology and are consistent with all applicable limits of the plant safety analyses that are addressed in the Final Safety Analysis Report (FSAR). The concept of a COLR and the provisions of GL 88-16 were incorporated into the improved Standard Technical Specifications for Combustion Engineering Plants (NUREG-1432).

Description of Proposed TS Changes

Modifications to individual specifications involve replacing the operating limit with a reference to the COLR, deleting applicable figures which are relocated to the COLR, and making editorial changes for the purpose of clarification. In the following descriptions, text being added is shown in bold italics and text being omitted is shown with strikeout.

Section 1.0 DEFINITIONS (pg. 1-2): Add the following definition:

CORE OPERATING LIMITS REPORT (COLR)

1.9a The COLR is the unit-specific document that provides cycle specific parameter limits for the current operating reload cycle. These cycle-specific parameter limits shall be determined for each reload cycle in accordance with Specification 6.9.1.11. Plant operation within these limits is addressed in individual Specifications.

TS 3.1.1.4 (pg. 3/4 1-5), MODERATOR TEMPERATURE COEFFICIENT:

Revise the LCO to read, "3.1.1.4 The moderator temperature coefficient (MTC) shall be *maintained within the limits specified in the COLR. The maximum positive limit shall be*:"

Delete item c, "~~c. Less negative than -28 pcm/°F at RATED THERMAL POWER~~."

TS 3/4.1.3.1 (pps. 3/4 1-21, 1-22, 1-23), FULL LENGTH CEA POSITION :

ACTION e: Change final line of this action to read, "... shown in *COLR* Figure 3.1-1a ."

ACTION f: Change this action to read, "With one full-length CEA misaligned from any other CEA in its group by 15 or more inches beyond the time constraints shown in *COLR* Figure 3.1-1a, ..."

ACTION f.2.a): Change this action to read, "Within 1 hour the remainder of the CEAs in the group with the inoperable CEA shall be aligned to within 7.5 inches of the inoperable CEA while maintaining the allowable CEA sequence and insertion limits shown on *COLR* Figure 3.1-2; ..."

SURVEILLANCE REQUIREMENT 4.1.3.1.4: Change the last line of this surveillance to read, "... Dependent Insertion Limit of *COLR* Figure 3.1-2:"

Delete Figure 3.1-1a, "Allowable Time to Realign CEA vs. Initial F_r^T "

TS 3.1.3.6 (pps. 3/4 1-28, 1-30), REGULATING CEA INSERTION LIMITS:

Change the LCO to read, " 3.1.3.6 The regulating CEA groups shall be limited to the withdrawal sequence and to the insertion limits ***specified in the COLR*** ~~shown in Figure 3.1-2~~ (regulating CEAs are considered to be fully withdrawn ~~in accordance with Figure 3.1-2~~ when withdrawn to at least 129.0 inches) ..."

ACTION a.2: Revise the last line of this action, "...position ~~using the above figure~~ ***and insertion limits specified in the COLR.*** "

ACTION b.1: Revise as follows, "The Short Term Steady State Insertion Limits ~~of Figure 3.1-2~~ are not exceeded, or "

Delete Figure 3.1-2, "CEA Insertion Limits vs. THERMAL POWER with 4 Reactor Coolant Pumps Operating"

TS 3/4.2.1 (pps. 3/4 2-1through 2-8), LINEAR HEAT RATE:

Change the LCO to read, "3.2.1 The linear heat rate shall not exceed the limits ~~shown on Figure 3.2-1~~ ***specified in the COLR.*** "

ACTION: Change the third line of the condition statement to read, "...the power dependent control limits of *COLR* Figure 3.2-2, ..."

SURVEILLANCE REQUIREMENT 4.2.1.3: Change to read, " The excore detector monitoring system may be used for monitoring the ~~core power distribution~~ ***linear heat rate*** by: "

4.2.1.3.b: Change the last line to read, "...*COLR* Figure 3.2-2."

4.2.1.3.c: Change the second line to read, "...limits of *COLR* Figure 3.2-2, ..."

4.2.1.3.c.2: Change the last line to read, " ...*COLR* Figure 3.2-3."

SURVEILLANCE REQUIREMENT 4.2.1.4: Change to read, " The incore detector monitoring system may be used for monitoring the ~~core power distribution~~ ***linear heat rate*** by verifying ..."

4.2.1.4.b: Change the last line to read, " *COLR* Figure 3.2-1."

Delete FIGURE 3.2-1, "ALLOWABLE PEAK LINEAR HEAT RATE VS. BURNUP,"

and replace with the statement, "*Pages 3/4 2-4 (Amendment 106), 3/4 2-5 (Amendment 63), and 3/4 2-6 through 3/4 2-8 (Amendment 109) have been deleted from the Technical Specifications. The next page is 3/4 2-9.* "

Delete FIGURE 3.2-2, "AXIAL SHAPE INDEX VS. MAXIMUM ALLOWABLE POWER LEVEL PER SPECIFICATION 4.2.1.3." Delete this page (3/4 2-4) from the TS.

Delete blank pages 3/4 2-5 through 3/4 2-7 from the TS.

Delete FIGURE 3.2-3, "Allowable Combinations of Thermal Power And F_r^T. " Delete this page (3/4 2-8) from the TS.

TS 3.2.3 (pg. 3/4 2-9), TOTAL INTEGRATED RADIAL PEAKING FACTOR - F_r^T:

Revise the LCO to read, "3.2.3 The calculated value of F_r^T shall be ~~limited to ≤ 1.70~~ *within the limits specified in the COLR.* "

ACTION: Revise the condition statement to read, "With F_r^T ~~> 1.70~~ *not within limits,* within 6 hours either: ... "

ACTION b: Revise to read, " Reduce THERMAL POWER to bring the combination of THERMAL POWER and F_r^T to within the limits of *COLR* Figure 3.2-3 and withdraw the full length CEAs to or beyond the Long Term Steady State Insertion Limits of Specification 3.1.3.6. The THERMAL POWER limit determined from *COLR* Figure 3.2-3 shall then be used to establish a revised upper THERMAL POWER level limit on *COLR* Figure 3.2-4 (truncate Figure 3.2-4 at the allowable fraction of RATED THERMAL POWER determined by *COLR* Figure 3.2-3) and subsequent operation shall be maintained within the reduced acceptable operation region of *COLR* Figure 3.2-4."

TS 3/4.2.5 (pg. 3/4 2-13, 2-14, 2-15), DNB PARAMETERS:

SURVEILLANCE REQUIREMENT 4.2.5.2: Modify this surveillance with an asterisk after the word "measurement" and add the following footnote,

> ****Not required to be performed until THERMAL POWER is ≥ 90% of RATED THERMAL POWER.***

TABLE 3.2-1: For the parameter AXIAL SHAPE INDEX, change the associated limit specified in the column labeled "Four Reactor Coolant Pumps Operating" to read, "*COLR* Figure 3.2-4"

Delete FIGURE 3.2-4, "AXIAL SHAPE INDEX Operating Limits With 4 Reactor Coolant Pumps Operating." Delete this page (3/4 2-15) from the TS.

TS 3/4.9.1 (pg. 3/4 9-1), REFUELING OPERATIONS BORON CONCENTRATION:

Revise the LCO as follows: "3.9.1 With the reactor vessel head unbolted or removed, the boron concentration of all filled portions of the Reactor Coolant System and the refueling cavity shall be maintained ***within the limit specified in the COLR.***" ~~uniform and sufficient to ensure that the more restrictive of the following reactivity conditions is met:~~

~~a. Either a K_{eff} of 0.95 or less, which includes a 1000 pcm conservative allowance for uncertainties, or~~

~~b. A boron concentration of ≥ 1720 ppm, which includes a 50 ppm conservative allowance for uncertainties.~~"

ACTION: Revise to read, "With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or positive reactivity changes and initiate and continue boration at ≥ 40 gpm of 1720 ppm boron or its equivalent ***to restore boron concentration to within limits.***" ~~until K_{eff} is reduced to ≤ 0.95 or the boron concentration is restored to ≥ 1720 ppm, whichever is the more restrictive. The provisions of Specification 3.0.3 are not applicable.~~

SURVEILLANCE REQUIREMENT 4.9.1.1: Revise the stem of this requirement to read, "~~The more restrictive of the above two reactivity conditions~~ ***The boron concentration limit*** shall be determined prior to: ..."

Bases pages B 3/4 1-1, B 3/4 1-4, B 3/4 2-1, and B 3/4 9-1 are revised to reflect the changes proposed above, as shown in Attachment 3 to this submittal.

Section 6.0, ADMINISTRATIVE CONTROLS (pg. 6.-19): Add new administrative control, "***6.9.1.11 CORE OPERATING LIMITS REPORT (COLR)***" as shown in Insert - B of Attachment 3 to this submittal.

Bases for the Proposed TS Changes

The present limits in the COLR (enclosed with this submittal) are unchanged from those existing in the current TS. However, the proposed amendment will allow Florida Power and Light Company (FPL) to make changes to these parameter limits, as appropriate for a specific reload core design, without the need for a license amendment to update the TS prior to implementation. As discussed in Generic Letter (GL) 88-16, such changes can be made, without affecting nuclear safety, provided such changes are developed using an NRC-approved methodology and the calculated parameter limits are consistent with all applicable plant safety analyses limits.

DEFINITION 1.9a is added to the St. Lucie Unit 1 Technical Specifications to formally define the Core Operating Limits Report (COLR). The COLR will provide cycle specific reactor physics parameter limits for each current operating reload cycle that are not otherwise retained in individual technical specifications. Accordingly, Limiting Conditions for Operation (LCO) 3.1.1.4, Moderator Temperature Coefficient; 3/4.1.3.1, Full Length CEA Position; 3.1.3.6, Regulating CEA Insertion Limits; 3/4.2.1, Linear Heat Rate; 3.2.3, Total Integrated Radial Peaking Factor; 3/4.2.5, DNB Parameters; and 3/4.9.1, Refueling Operations-Boron Concentration are modified to replace the specific values of cycle-specific parameter limits with the appropriate reference to the formally defined COLR. The affected specifications are also modified, as appropriate, to require that the plant be operated within the bounds of these calculated limits. These changes conform to the guidance in GL 88-16 and are consistent with NUREG-1432.

TS 6.9.1.11 is added to the administrative controls section:

> Part "a" requires the cycle specific parameter limits for the above listed LCOs to be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and to be documented in the COLR.
>
> Part "b" requires the analytical methods employed to determine the core operating limits to be those previously reviewed and approved by the NRC, and lists the documents that describe those methods used for St. Lucie Unit 1. The safety analysis methods of Siemens Power Corporation (SPC) and the nuclear design methods of Westinghouse Electric Corporation (W) are used, where appropriate, in defining the specified COLR parameter limits. The safety analyses for reload core designs are performed by SPC. However, the generation of physics input to the safety analyses is accomplished by either SPC using their codes, or by FPL using the W computer codes. FPL's training and competence in the application of the W nuclear design methods to perform core reload design analyses, and performance data demonstrating core physics model verification for St. Lucie Unit 1 are documented in NF-TR-95-01, "Nuclear Physics Methodology for Reload Design of Turkey Point & St. Lucie Nuclear Plants," Florida Power & Light Company, January

1995, previously submitted to the NRC under Docket Nos. 50-250 and 50-251 (FPL letter L-95-006, January 17, 1995). The topical report was approved as an acceptable reference in the COLR and associated TS for FPL's Turkey Point Plants (Letter from R.P. Croteau (NRC) to J.H. Goldberg (FPL), TURKEY POINT UNITS 3 AND 4 - ISSUANCE OF AMENDMENTS RE: IMPLEMENTATION OF FPL NUCLEAR PHYSICS METHODOLOGY (TAC NOS. M91393 AND M91394); June 9, 1995). Similarly, FPL desires that NF-TR-95-01 be docketed with the reference methodologies for the St. Lucie Unit 1 COLR, and includes this reference in proposed TS 6.9.1.11.b.2.

Part "c" requires that the core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SHUTDOWN MARGIN, transient analysis limits, and accident analysis limits) of the safety analyses are met.

Finally, Part "d" requires the COLR to be submitted, upon issuance, to the NRC for each reload cycle and for any mid-cycle revisions or supplements thereto.

The proposed administrative control TS 6.9.1.11 conforms to the guidance provided in GL 88-16 and is consistent with the corresponding specification of NUREG-1432.

In addition to the revisions needed to implement the COLR, the following administrative changes are included:

TS 4.2.1.3 (Excore Detector Monitoring System) and 4.2.1.4 (Incore Detector Monitoring System): The phrase "core power distribution" is replaced with "linear heat rate" to more accurately reflect the parameter addressed by these surveillance requirements

TS 4.2.5.2 (DNB Parameters-Surveillance Requirements): This surveillance requires the Reactor Coolant System total flow rate to be determined by measurement at least once per 18 months and is applicable during operational Mode 1. The measurement is performed by calorimetric heat balance. A footnote is added to indicate that the surveillance is not required to be performed until thermal power is $\geq$ 90% of rated thermal power. The footnote is necessary to allow measurement of the flow rate at normal operating conditions in Mode 1 since the surveillance cannot be performed in Mode 2 or below, and will not yield accurate results if performed below 90% of rated thermal power. This provision is consistent with corresponding SR 3.4.1.4 of the Standard Technical Specifications for Combustion Engineering Plants (NUREG-1432, Revision 1).

TS 3.9.1 (Refueling Operations-Boron Concentration): The existing ACTION requirements include a statement that, "The provisions of Specification 3.0.3 are not applicable." Since TS 3.0.3 is not applicable in Mode 6 (the applicable mode for TS 3.9.1) by definition, the statement is redundant and is deleted.

Pages 3/4 2-5 through 3/4 2-8 will be deleted from the TS since these pages will be blank. A note is added to the preceding page, 3/4 2-4, which documents deletion of the affected pages and maintains continuity of pagination.

Page 3/4 2-15 is the last page of TS section 3/4.2 and can be deleted, as proposed, without interrupting the page sequence.

Conclusion

The proposed changes to the Technical Specifications conform to the guidelines of GL 88-16 to modify TS that have cycle-specific parameter limits. The values of these parameter limits are defined in the COLR. In addition to 10 CFR 50.59, changes to the COLR will be controlled in accordance with the proposed administrative controls in this submittal which require the use of NRC-approved methodologies and require that all applicable limits of the safety analyses are met. The COLR, including any mid-cycle revisions or supplements thereto, shall be provided to the NRC upon issuance, for each reload cycle.

Accounting for plant specific differences in format, the proposed TS changes are consistent with the Standard Technical Specifications for Combustion Engineering Plants. As discussed in Attachment 2 to this submittal, the proposed license amendment does not involve a significant hazards consideration.

St. Lucie Unit 1
Docket No. 50-335
Proposed License Amendment
Core Operating Limits Report (COLR)

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of amendment request: The proposed amendment to Facility Operating License DPR-67 for St. Lucie Unit 1 (PSL1) will modify specifications for selected cycle-specific reactor physics parameters to refer to the St. Lucie Unit 1 Core Operating Limits Report (COLR) for limiting values. Editorial changes are also included for purposes of clarification. The proposed Technical Specification (TS) changes conform to the guidance provided in Generic Letter 88-16 and are consistent with the Standard Technical Specifications for Combustion Engineering Plants (NUREG-1432, Revision 1).

Pursuant to 10 CFR 50.92, 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 amendment relocates the calculated values of selected cycle-specific reactor physics parameter limits from the TS to the COLR, and includes minor editorial changes which do not alter the intent of stated requirements. The amendment is administrative in nature and has no impact on any plant configuration or system performance relied upon to mitigate the consequences of an accident. Parameter limits specified in the COLR for this amendment are not changed from the values presently required by Technical Specifications. Future changes to the calculated values of such limits may only be made using NRC approved methodologies, must be consistent with all applicable safety analysis limits, and are controlled by the 10 CFR 50.59 process. Assumptions used for accident initiators and/or safety analysis acceptance criteria are not changed by this amendment. 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 relocates the calculated values of cycle specific reactor physics limiting parameters to the COLR and will not change the physical plant or the modes of operation defined in the facility license. The changes do not involve the addition of new equipment or the modification of existing

equipment, nor do they alter the design configuration of St. Lucie plant systems. 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 cycle specific parameter limits being relocated to the COLR by this amendment have not been changed from the values presently required by the TS, and a requirement to operate the plant within the bounds of the limits specified in the COLR is retained in the individual specifications. Future changes to the calculated values of these limits by the licensee may only be developed using NRC-approved methodologies, must remain consistent with all plant safety analysis limits addressed in the Final Safety Analysis Report (FSAR), and are further controlled by the 10 CFR 50.59 process. As discussed in Generic Letter 88-16, the administrative controls established for the values of cycle specific parameters using the guidance of that letter assure conformance with 10 CFR 50.36. Safety analysis acceptance criteria are not being altered by this amendment. 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.