CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9709030299 DOC.DATE: 97/08/22 NOTARIZED: NO DOCKET #
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
AUTH.NAME AUTHOR AFFILIATION
STALL,J.A. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Application for amends to licenses DPR-67 & NPF-16,revising Specification 4.0.5,Surveillance Requirements for ISI & testing of ASME Code Class 1,2 & 3 components,to relocate IST Program requirements to Administrative Controls Section.

DISTRIBUTION CODE: A047D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 13+38
TITLE: OR Submittal: Inservice/Testing/Relief from ASME Code - GL-89-04

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD2-3 LA	1	1	PD2-3 PD	1	1
	WIENS,L.	1	1			
INTERNAL:	AGRS	1	1	AEOD/SPD/RAB	1	1
	FILE CENTER 01	1	1	NRR/DE/EMEB	1	1
	NUDOCS-ABSTRACT	1	1	OGC/HDS3	1	0
	RES/DET/EIB	1	1	RES/DET/EMMEB	1	1
EXTERNAL:	LITCO ANDERSON	1	1	NOAC	1	1
	NRC PDR	1	1			

CATEGORY 1 DOCUMENT

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 14 ENCL 13

Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420

FPL

AUG 2 2 1997

L-97-215
10 CFR 50.90
10 CFR 50.92

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

RE: St. Lucie Units 1 and 2
Docket No. 50-335 and 50-389
Proposed License Amendment
Pump and Valve Inservice Testing Program

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 Units 1 and 2.

The proposed amendment revises Specification 4.0.5, Surveillance Requirements for Inservice Inspection and Testing of ASME Code Class 1, 2, and 3 components, to relocate the Inservice Testing Program requirements from Specification 4.0.5 to the Administrative Controls Section 6.8, Procedures and Programs. The proposed amendment also provides conforming changes to several Surveillance Requirements to change the reference from Specification 4.0.5 to the Inservice Testing Program.

Attachments 1A and 1B describe and justify the proposed amendments to the Unit 1 and Unit 2 Technical Specifications. Attachment 2 is the *Determination of No Significant Hazards Consideration.* Attachments 3A and 3B are the marked up copies of the proposed Technical Specification pages for Unit 1 and Unit 2, respectively.

The proposed amendments have 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.

A047 1/1

Approval of this proposed license amendment is requested by February 1, 1998, to support implementation of the Unit 1 third interval ASME Code required Inservice Test (IST) Program and an upgrade to the Unit 2 second interval IST Program.

Please contact us if there are any questions about this submittal.

Very truly yours,

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

JAS/GRM

Attachments

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

STATE OF FLORIDA)
) ss.
COUNTY OF PALM BEACH)

R. S. Kundalkar being first duly sworn, deposes and says:

That he is Vice President, Engineering, 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.

R. S. Kundalkar

STATE OF FLORIDA

COUNTY OF Palm Beach

Sworn to and subscribed before me

this 22 day of August, 1997
by R. S. Kundalkar, who is personally known to me.

Judith Ann Creasman
Name of Notary Public - State of Florida

OFFICIAL NOTARY SEAL
JUDITH ANN CREASMAN
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. CC605634
MY COMMISSION EXP. DEC. 5,2000

(Print, type or stamp Commissioned Name of Notary Public)

ATTACHMENT 1A

DESCRIPTION OF AMENDMENT REQUEST-UNIT 1

Description and Purpose

Changes are proposed to revise St. Lucie Unit 1 Technical Specifications to implement an administrative improvement suggested by the NRC. Specifically, in NUREG-1482, *Guidelines for Inservice Testing At Nuclear Power Plants*, a suggestion was made to conform the requirements of the ASME Pump and Valve Testing Program with the appropriate standard Technical Specifications.

The proposed changes remove the requirements for inservice testing of pumps and valves from Specification 4.0.5 and replaces it with an equivalent administrative requirement in Section 6 of the Technical Specifications. The requirement for "specific written approval" of relief where Code requirements are impractical is eliminated in deference to the approval requirement stated in 10 CFR 50.55a.

Background

With the current version of the Technical Specifications, whenever it is determined that a specific Code requirement cannot be satisfied, regardless of its safety significance, compliance with the Technical Specifications requires that the NRC provide exigent written relief, otherwise it could be construed that the affected component(s) or systems are inoperable. The NRC has agreed that it is impractical to comply with this requirement and, in NUREG-1482, Section 6, the NRC recommended that all licensees revise their Technical Specifications accordingly. In light of the forthcoming upgrade of the St. Lucie Inservice Testing Program (due to be implemented on February 11,1998) and the anticipation of several requests for relief associated with that change, it is prudent and reasonable to effect this change to relieve schedule pressures for approval on both FPL and the NRC. The regulation allows up to a year for approval during which time the licensee can implement the alternate testing proposed by the relief requests provided that Code requirements are impractical and not simply optional.

Section 6 of NUREG-1482 gives specific instructions as to the format and wording of the proposed changes; however, it is apparent that this was based on an earlier version of the Standard Technical Specifications. The proposed change is consistent with the latest version of NUREG-1432, *Improved Standard Technical Specifications Combustion Engineering Plants*, Revision 1, and thus is not identical with the NUREG-1482, although the intent is the same.

Discussion and Description of Proposed Changes

The following changes in the Unit 1 Technical Specifications, shown in the attached marked up pages, are proposed:

1. TS 4.0.5.a: The reference to inservice testing of pumps and valves is stricken from this Specification.

   Justification: The applicable requirements for inservice testing of pumps and valves are relocated to Specification 6.8.4.i.

2. TS 4.0.5.b: The definition of surveillance intervals is related only to inservice testing of pumps and valves and, as such, is stricken from this Specification.

   Justification: The definition of surveillance intervals for inservice testing of pumps and valves is expanded and relocated to Specification 6.8.4.i.

3. TS 4.0.5.c: The applicability of surveillance interval extensions is related only to inservice testing of pumps and valves and, as such, is stricken from this Specification.

   Justification: The applicability of Specification 4.0.2 for surveillance interval extensions for inservice testing of pumps and valves is relocated to Specification 6.8.4.i.

4. TS 4.1.2.3: The reference for testing the charging or high pressure safety injection pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

5. TS 4.1.2.4: The reference for testing the charging pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

6. TS 4.1.2.5: The reference for testing the boric acid pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

7. TS 4.1.2.6: The reference for testing the boric acid pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

8. TS 4.4.2: The reference for testing the pressurizer code safety valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

9. TS 4.4.3: The reference for testing the pressurizer code safety valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

10. TS 4.5.2.f: The reference for testing the high pressure and low pressure safety injection pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

11. TS 4.6.2.1.b: The reference for testing the containment spray pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

12. TS 4.6.3.1.3: The reference for testing the power-operated or automatic containment isolation valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

13. TS 4.6.5.1: The reference for testing the containment vessel to annulus vacuum relief valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

14. TS 4.7.1.1: The reference for testing the main steam line code safety valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

15. TS 4.7.1.5: The reference for testing the main steam line isolation valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

16. TS 6.8.4.i: Added a new requirement to the administrative Specification defining the requirements for implementing the Inservice Testing Program for pumps and Valves. It also updates and clarifies Code requirements including reference to ASME/ANSI OM-Code, *Operation and Maintenance of Nuclear Power Plants*.

Justification: This requires implementation of a pump and valve Inservice Testing Program in compliance with 10 CFR 50.55a and clarifies the compliance requirements of the applicable sections of both the ASME Boiler and Pressure Vessel Code and ASME/ANSI OM-Code.

Summary

The proposed revision to the St. Lucie Unit 1 Technical Specifications, by adopting the recommendations of NUREG-1482 and NUREG-1432, will allow the licensee to fully comply with the prescribed requirements of 10 CFR 50.55a and the plant Technical Specifications without placing impractical administrative requirements on the plant staff or the NRC.

ATTACHMENT 1B

DESCRIPTION OF AMENDMENT REQUEST-UNIT 2

Description and Purpose

Changes are proposed to revise St. Lucie Unit 2 Technical Specifications to implement an administrative improvement suggested by the NRC. Specifically, in NUREG-1482, *Guidelines for Inservice Testing At Nuclear Power Plants*, a suggestion was made to conform the requirements of the ASME Pump and Valve Testing Program with the appropriate standard Technical Specifications.

The proposed changes remove the requirements for inservice testing of pumps and valves from Specification 4.0.5 and replaces it with an equivalent administrative requirement in Section 6 of the Technical Specifications. In so doing the requirement for "specific written approval" of relief where Code requirements are impractical is eliminated in deference to the approval requirement stated in 10 CFR 50.55a.

Background

With the current version of the Technical Specifications, whenever it is determined that a specific Code requirement cannot be satisfied, regardless of its safety significance, compliance with the Technical Specifications requires that the NRC provide exigent written relief, otherwise it could be construed that the affected component(s) or systems are inoperable. The NRC has agreed that it is impractical to comply with this requirement and, in NUREG-1482, Section 6 they recommended that all licensees revise their Technical Specifications accordingly. In light of the forthcoming upgrade of the St. Lucie Inservice Testing Program (due to be implemented on February 11,1998) and the anticipation of several requests for relief associated with that change, it is prudent and reasonable to effect this change to relieve schedule pressures for approval on both FPL and the NRC. The regulation allows up to a year for approval during which time the licensee can implement the alternate testing proposed by the relief requests provided that Code requirements are impractical and not simply optional.

Section 6 of NUREG-1482 gives specific instructions as to the format and wording of the proposed changes; however, it is apparent that this was based on an earlier version of the standard technical specifications. The proposed change is consistent with the latest version of NUREG-1432, *Improved Standard Technical Specifications Combustion Engineering Plants*, Revision 1, and thus is not identical with NUREG-1482, although the intent is the same.

Discussion and Description of Proposed Changes

The following changes in the Unit 2 Technical Specifications, shown in the attached marked up pages, are proposed:

1. TS 4.0.5.a: The reference to inservice testing of pumps and valves is stricken from this Specification.

   Justification: The applicable requirements for inservice testing of pumps and valves are relocated to Specification 6.8.4.i.

2. TS 4.0.5.b: The definition of surveillance intervals is related only to inservice testing of pumps and valves and, as such, is stricken from this Specification.

   Justification: The definition of surveillance intervals for inservice testing of pumps and valves is expanded and relocated to Specification 6.8.4.i.

3. TS 4.0.5.c: The applicability of surveillance interval extensions is related only to inservice testing of pumps and valves and, as such, is stricken from this Specification.

   Justification: The applicability of Specification 4.0.2 for surveillance interval extensions for inservice testing of pumps and valves is relocated to Specification 6.8.4.i.

4. TS 4.1.2.3: The reference for testing the charging or high pressure safety injection pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

5. TS 4.1.2.4.1: The reference for testing the charging pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

6. TS 4.1.2.5: The reference for testing the boric acid pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

7. TS 4.1.2.6: The reference for testing the boric acid pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

   Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

8. TS 4.4.2.1: The reference for testing the pressurizer code safety valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

9. TS 4.4.2.2: The reference for testing the pressurizer code safety valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

10. TS 4.4.9.3.1: The reference for testing the PORV's is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

11. TS 4.5.2.g: The reference for testing the high pressure and low pressure safety injection pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

12. TS 4.6.2.1.b: The reference for testing the containment spray pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

13. TS 4.6.2.2.b: The reference for testing the iodine removal pumps is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these pumps is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

14. TS 4.6.3.3: The reference for testing the power-operated or automatic containment isolation valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

15. TS 4.6.5: The reference for testing the containment vessel to annulus vacuum relief valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

16. TS 4.7.1.1: The reference for testing the main steam line code safety valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

17. TS 4.7.1.5: The reference for testing the main steam line isolation valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

18. TS 4.7.1.6.a: The reference for testing the main feedwater isolation valves is changed from "Specification 4.0.5" to "the Inservice Testing Program."

Justification: The inservice testing of these valves is no longer governed by Specification 4.0.5 but is defined by the Inservice Testing Program (Specification 6.8.4.i.).

19. TS 6.8.4.i: Added a new requirement to the administrative Specification defining the requirements for implementing the Inservice Testing Program for Pumps and Valves. It also updates and clarifies Code requirements including reference to ASME/ANSI OM-Code, *Operation and Maintenance of Nuclear Power Plants*.

Justification: This requires implementation of a pump and valve Inservice Testing Program in compliance with 10 CFR 50.55a and clarifies the compliance requirements of the applicable sections of both the ASME Boiler and Pressure Vessel Code and ASME/ANSI OM-Code.

Summary

The proposed revision to the St. Lucie Unit 2 Technical Specifications, by adopting the recommendations of NUREG-1482 and NUREG-1432, will allow the licensee to fully comply with the prescribed requirements of 10 CFR 50.55a and the plant Technical Specifications without placing impractical administrative requirements on the plant staff or the NRC.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Description of proposed license amendments

The proposed license amendments involve changes to the existing Technical Specifications of St. Lucie Units 1&2. These changes are consistent with guidance provided by Nuclear Regulatory Commission (NRC) NUREG-1482, Guidelines for Inservice Testing At Nuclear Power Plants. These changes are purely administrative and do not affect plant design, modes of operation, or the scope or intent of the pump and valve inservice testing program.

Introduction

The Nuclear Regulatory Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92c). A proposed amendment to an operating license for a facility 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 below for the proposed amendments.

Discussion

(1) **Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated. There are no changes to the testing and evaluation related to pumps and valves in the Inservice Testing Program. The only substantive change allows the implementation of alternate testing provisions where Code-requirements are impractical and the NRC has not formally provided written approval. Since impractical testing would not be performed in any event, the actual testing program is unaffected.

(2) **Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The use of the modified specifications cannot create the possibility of a new or different kind of accident from any previously evaluated since the proposed amendments will not change the physical plant or the modes of plant operation defined in the facility operating license. No new failure mode is introduced due to implementation of this administrative change since the proposed changes do not involve the addition or modification of equipment, nor do they alter the design or operation of affected plant systems, structures, or components.

(3) **Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.**

The operating limits and functional capabilities of the affected systems, structures, and components remain unchanged by the proposed amendments, therefore, these changes do not involve a significant reduction in the margin of safety.

Summary

Based on the above discussion, FPL has determined that the proposed amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (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 and therefore, the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.