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SUBJECT: Application for amends to licenses DPR-67 & NPF-16 to incorporate attached TS revs.Proposed amend are administrative in nature & will modify explosive gas mixture surveillance requirement 4.11.2.5.1.

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FPL

June 3, 1998

L-98-125
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
Explosive Gas Mixture Monitoring Requirements

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating License DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. The proposed amendments are administrative in nature and will modify Explosive Gas Mixture Surveillance Requirement 4.11.2.5.1 to provide for the use of the laboratory gas partitioner to periodically analyze the concentration of oxygen in the on service waste gas decay tank in the event that continuous monitoring capability becomes inoperable. Use of the lab gas partitioner to analyze periodic samples is a previously approved conditional exception to the continuous monitoring requirement of Specification 4.11.2.5.1 which was inadvertently removed by subsequent license amendments. It is requested that the proposed amendments, if approved, be issued as expeditiously as practicable to ensure that compliance with the explicit terms of the requirement for continuous monitoring, as currently stated, would not result in unnecessarily bypassing an on service waste gas decay tank.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachment 3 contains copies of the affected technical specifications 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,

J. A. Stall
Vice President
St. Lucie Plant

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APP1



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JAS/RLD

Attachments

cc: 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)
) 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.



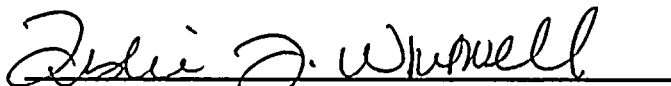
J. A. Stall

STATE OF FLORIDA
COUNTY OF St. Lucie

Sworn to and subscribed before me

this 3 day of June, 19 98

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



Signature of Notary Public - State of Florida



Julie D. Whitwell
MY COMMISSION # CC646183 EXPIRES
May 12, 2001
BONDED THRU TROY FAIR INSURANCE, INC.

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

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St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Explosive Gas Mixture Monitoring Requirements

ATTACHMENT 1 to FPL letter L-98-125

EVALUATION OF PROPOSED TS CHANGES

EVALUATION OF PROPOSED TS CHANGES

1.0 Introduction

The proposed amendments to Facility Operating Licenses DPR-67 for St. Lucie Unit 1 (PSL1) and NPF-16 for St. Lucie Unit 2 (PSL2) will modify the explosive gas mixture continuous monitoring requirement specified for the waste gas decay tanks in Surveillance Requirement 4.11.2.5.1 to identify a conditional exception to this requirement which had been previously approved and inadvertently removed by subsequent license amendments. The proposed change will allow limited operation of the waste gas decay tanks using the laboratory gas partitioner to periodically analyze the oxygen concentration of waste gases in the event that continuous monitoring capability becomes inoperable, and will ensure that compliance with the literal meaning of "continuously monitoring the waste gases," as currently stated in the surveillance, would not result in unnecessarily bypassing an on service decay tank. It is concluded in Attachment 2 that the proposed TS changes do not involve a significant hazards consideration.

2.0 Background

St. Lucie Technical Specification (TS) 3/4.11.2.5, *Explosive Gas Mixture*, provides limits and monitoring requirements for combinations of oxygen and hydrogen in the waste gas decay tanks for each PSL unit. The purpose of Specification 3/4.11.2.5 and associated instrumentation operability requirements (formerly TS 3/4.3.3.10) is to provide assurance that unacceptable mixtures of oxygen and hydrogen will be detected and mitigated during operations using the waste gas holdup system at each unit. The waste gas holdup system includes three tanks for the purpose of reducing the total radioactivity by allowing radioactive decay prior to release to the environment. One of the three decay tanks is normally aligned to receive waste gas from the processing system and serves as the "on service" waste gas decay tank. Dual gas analyzers are installed in the waste gas system to monitor the oxygen concentration of the typically hydrogen rich gases, and thereby ensure that unacceptable mixtures of oxygen and hydrogen can be detected.

Surveillance Requirement 4.11.2.5.1 currently requires that the concentration of oxygen shall be determined to be within the limits of Specification 3.11.2.5 by "continuously

monitoring" the waste gases in the on service waste gas decay tank. The oxygen monitor operability requirements, however, are contained in the Updated Final Safety Analysis Report (UFSAR) for each St. Lucie Unit and provide a conditional exception to the "continuously monitoring" criterion which, in the event that both of the installed oxygen monitors become inoperable, allows operation of the waste gas holdup system for up to 30 days provided that samples of oxygen are analyzed using the lab gas partitioner at least once per 24 hours (Ref: PSL1 UFSAR Section 13.8.1.4; PSL2 UFSAR Section 13.7.1.4).

The explosive gas monitoring instrumentation requirements were formerly in the facility technical specifications as TS 3/4.3.3.10 and were relocated to the UFSAR, without any changes to the approved requirements, consistent with Generic Letter (GL) 95-10 (Ref: License Amendment Nos. 147 and 86, PSL1 and PSL2 respectively: 8/20/96). TS 3/4.11.2.5 was not addressed by the relocation process, and Surveillance Requirement 4.11.2.5.1 specified that the waste gases in the on service waste gas decay tank shall be continuously monitored "with the oxygen monitor required OPERABLE by Table 3.3-13 of Specification 3.3.3.10."

As part of an administrative update to the St. Lucie TS, the reference to "with the oxygen monitor required OPERABLE by Table 3.3-13 of Specification 3.3.3.10" was removed from Surveillance Requirement 4.11.2.5.1 since the instrumentation TS no longer existed (Ref: License Amendment Nos. 152 and 89, PSL1 and PSL2 respectively: 9/22/97). However, a conditional modifier for the "continuously monitoring" criterion was not included with the administrative update to reflect the action that had been approved for implementation when both installed oxygen monitors become inoperable and which had been relocated to the UFSAR.

On November 21, 1997, NRC Information Notice (IN) 97-80, *Licensee Technical Specifications Interpretations*, was issued to alert licensees to problems identified with licensee TS interpretations. IN 97-80 states, in part, "Licensee TS interpretations can enhance the safe operation of the plant by helping the plant staff understand and correctly implement TS requirements. However, licensees must exercise caution to ensure that TS interpretations do not change the wording, the meaning, or the intent of TS requirements." Similarly, NRC Inspection Manual Part 9900, *Tech Guidance, Licensee TS Interpretations* (2/3/97) concludes, in part, "As stated earlier, the most important factor is that the TS interpretation does not conflict with TS wording or intent." ... "Reliance on a TS interpretation when an error is discovered in the TS is not acceptable. The NRC expects

licensees to comply with the explicit terms of TS or apply for a license amendment, pursuant to 10 CFR 50.90, to change the TS terms rather than relying on a TS interpretation or engineering analyses to justify a temporary departure from TS requirements. In the event that an error in TS is discovered, the licensee should restrict plant operations, as appropriate, until an amendment can be processed or other acceptable actions are taken.”

Compliance with the explicit terms of Surveillance Requirement 4.11.2.5.1, as presently stated, can not be achieved unless at least one oxygen monitor is continuously monitoring the waste gases, or unless the waste gas system is aligned to bypass the waste gas decay tanks.

3.0 Proposed Changes: Description and Bases/Justification

Attachment 3 contains copies of the affected TS pages marked-up to show the proposed changes.

3.1 Description of Changes to TS 4.11.2.5.1

(a) Add an asterisk to the word “continuously,” such that the Specification reads,

The concentration of oxygen in the waste gas decay tank shall be determined to be within the above limits by continuously* monitoring the waste gases in the on service waste gas decay tank.

(b) Add the following footnote,

*** When continuous monitoring capability is inoperable, waste gases shall be monitored in accordance with the actions specified for the Waste Gas Decay Tanks Explosive Gas Monitoring System in Chapter 13 of the Updated Final Safety Analysis Report.**

3.2 Basis/Justification for Proposed Changes

Compliance with the explicit terms, "continuously monitoring the waste gases," of Surveillance Requirement 4.11.2.5.1, as presently stated, cannot be achieved when the oxygen monitors installed to analyze the gases in the waste gas holdup system become inoperable. However, operation of the waste gas holdup system can continue if the system is aligned to bypass the waste gas decay tanks which would then make the surveillance not applicable.

This constraint inadvertently evolved from previous license amendments issued during 1996 and 1997 (Nos. 152 and 147 for PSL1; Nos. 89 and 86 for PSL2) which relocated the explosive gas monitoring instrumentation operability requirements (formerly TS 3/4.3.3.10) to Chapter 13 of the UFSAR for each St. Lucie unit, and then deleted the reference to these operability requirements from Surveillance Requirement 4.11.2.5.1 as part of an administrative update to technical specifications. The UFSAR operability requirements for the *Waste Gas Decay Tanks Explosive Gas Monitoring System* contain an "ACTION 1" which applies in the event at least one oxygen monitor is not OPERABLE during waste gas holdup system operation. ACTION 1 provides for operation of the waste gas holdup system "to continue for up to 30 days provided samples of oxygen are analyzed by the lab gas partitioner at least once per 24 hours." There were no changes to the operability requirements or the subject ACTION statement for the explosive gas monitoring instrumentation during the relocation process, and the requirements in the UFSAR are the same as provided in former TS 3/4.3.3.10.

The proposed revision to Surveillance Requirement 4.11.2.5.1 is administrative in nature, and will make the literal meaning of this specification consistent with the intended, and previously approved, conditional exception to the continuous monitoring requirement in the event that both installed gas analyzers become inoperable. If the continuous monitoring capability becomes inoperable, compliance with the explicit terms of the surveillance requirement will be possible without unnecessarily bypassing the waste gas decay tanks. Operation of the waste gas system using an on service decay tank is the preferred alignment of the waste gas system to allow storage and additional radioactive decay prior to release of waste gases to the environment, and is consistent with ALARA objectives.



4.0 Environmental Consideration

The proposed license amendment changes requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes the surveillance requirements. The proposed amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendment involves no significant hazards consideration and meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and that, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendment.

5.0 Conclusion

An inconsistency between *Explosive Gas Mixture* TS 3/4.11.2.5 and the requirements for the *Waste Gas Decay Tanks Explosive Gas Monitoring System* contained in the UFSAR was inadvertently created by previous license amendments. Compliance with the explicit terms of Surveillance Requirement 4.11.2.5.1, as presently stated, prevents implementation of a previously approved action for a case where continuous monitoring capability for oxygen concentration in waste gases becomes inoperable, and would result in unnecessarily bypassing the Waste Gas Decay Tanks. The proposed amendments are administrative in nature, and are consistent with regulatory guidance involving TS interpretations.



St. Lucie Unit 1 and Unit 2
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Proposed License Amendments
Explosive Gas Mixture Monitoring Requirements

ATTACHMENT 2 to FPL Letter L-98-125

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of amendment request: The proposed amendments will modify Explosive Gas Mixture Surveillance Requirement 4.11.2.5.1 to provide for using the laboratory gas partitioner to periodically analyze the oxygen concentration of waste gases in the on service waste gas decay tank in the event that continuous monitoring capability becomes inoperable. The proposed changes are administrative in nature and will rectify an inconsistency between Specification 4.11.2.5.1 and the Updated Final Safety Analysis Report (UFSAR) that was inadvertently created by previous license amendments.

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 license amendments are administrative in nature and will rectify an inconsistency between Surveillance Requirement 4.11.2.5.1 and the UFSAR that was inadvertently created by previous license amendments. The revisions will reinstate a previously approved conditional exception to the explicit terms of the presently stated TS requirement to continuously monitor the waste gases in the on service Waste Gas Decay Tank, and allow limited system operation using the laboratory gas partitioner to periodically analyze gas samples in the event that continuous monitoring capability becomes inoperable. Limits for potentially explosive mixtures of waste gases have not been altered, and explosive gas monitoring instrumentation does not prevent or mitigate design basis accidents or transients which assume a failure of or a challenge to a fission product barrier. The proposed revisions do not involve any change to the plant accident analyses assumptions, and do not involve accident initiators. 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 license amendments are administrative in nature and rectify an inconsistency between Technical Specification 4.11.2.5.1 and the UFSAR that was inadvertently created by previous license amendments. The revisions will not change the physical plant or the modes of plant operation defined in the Facility Licenses. The changes do not involve the addition or modification of equipment nor do they alter the design 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 license amendments are administrative in nature and rectify an inconsistency between Surveillance Requirement 4.11.2.5.1 and the UFSAR that was inadvertently created by previous license amendments. The revisions will reinstate a previously approved conditional exception to the explicit terms of the presently stated TS requirement to continuously monitor the waste gases in the on service Waste Gas Decay Tank, and allow limited system operation using the laboratory gas partitioner to periodically analyze gas samples in the event that continuous monitoring capability becomes inoperable. Limits for potentially explosive mixtures of waste gases have not been altered, and explosive gas monitoring instrumentation does not prevent or mitigate design basis accidents or transients which assume a failure of or a challenge to a fission product barrier. The proposed 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.