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SUBJECT: Application for amends to licenses DPR-67 & NPF-16, removing
obsolete license conditions & incorporating attached TS
revs.

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August 24, 1998

L-98-211
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
License Conditions Update and TS Clarification

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by removing obsolete license conditions and incorporating the attached Technical Specifications (TS) revisions. Proposed revisions to Surveillance Requirement 4.5.2 for each unit will clarify the component operations that must be verified in response to a containment sump recirculation actuation signal; and for St. Lucie Unit 1, the kitchen area exhaust duct isolation valves will be added to the list of equipment specified in TS 3.7.7.1 for an operable control room emergency ventilation system. In addition, items 2.C.19 and 2.I of facility operating license NPF-16 will be deleted, and items 2.B.5 and 2.F will be modified since the temporary conditions addressed by these articles have been satisfied.

Attachment 1 is an evaluation of the proposed amendments. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain copies of the affected Technical Specifications pages which are 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

Avail

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St. Lucie Unit 1 and Unit 2
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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

St. Lucie Unit 1 and Unit 2
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Page 3

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.



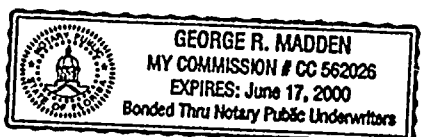
J. A. Stall

STATE OF FLORIDA
COUNTY OF St. Lucie

Sworn to and subscribed before me
this 24 day of August, 19 98
by J. A. Stall, who is personally known to me.



Signature of Notary Public-State of Florida



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

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
License Conditions Update and TS Clarification

ATTACHMENT 1 to FPL letter L-98-211

EVALUATION OF PROPOSED AMENDMENTS

EVALUATION OF PROPOSED AMENDMENTS

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: (a) for St. Lucie Unit 1, add the kitchen area exhaust duct isolation valves to the list of equipment identified in Technical Specification (TS) 3.7.7.1 for an operable control room emergency ventilation system; (b) for each St. Lucie unit, revise Surveillance Requirement 4.5.2 to clarify the component operations that must be verified in response to a containment sump recirculation actuation signal and; (c) for facility operating license NPF-16, delete Items 2.C.19 and 2.I, and modify items 2.B.5 and 2.F since the temporary conditions addressed by these articles have been satisfied. The proposed revisions are the result of issues identified in the St. Lucie plant corrective actions program and/or self-assessments that have been conducted to improve operating performance. FPL has determined that operation with the proposed amendments involves no significant hazards consideration.

2.0 Proposed Changes: Description and Bases/Justification

The affected Technical Specifications (TS) pages, marked-up to show the proposed changes, are contained in Attachment 3 (PSL1) and Attachment 4 (PSL2).

2.1 PSL1 Technical Specifications, 3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

PSL1 Technical Specification 3.7.7.1 establishes a Limiting Condition for Operation (LCO) for the Control Room Emergency Ventilation System (CREVS), and states:

"3.7.7.1 The control room emergency ventilation system shall be OPERABLE with:

- a. Two booster fans,
- b. Two isolation valves in each outside air intake duct,
- c. Two isolation valves in the toilet area air exhaust duct,
- d. One filter train, and
- e. At least two air conditioning units."

The CREVS assures control room habitability during post-accident conditions. In addition to the components described in the existing specification, two isolation valves located in the exhaust duct to the kitchen area adjacent to the control room are part of the control room boundary design and are required to close on receipt of a containment isolation signal to ensure operability of the CREVS. Absence of these valves from the listing shown in the specification was identified by the St. Lucie plant corrective actions program as a discrepancy that should be corrected to provide assurance that the LCO is consistent with design.

2.1.1 Description of the Change to PSL1 TS 3.7.7.1

On Page 3/4 7-20, edit items d. and e. as shown in Attachment 1 and add to the list of equipment shown in TS 3.7.7.1:

"f. Two isolation valves in the kitchen area exhaust duct."

2.1.2 Bases/Justification for the Change to PSL1 TS 3.7.7.1

The control room emergency ventilation system functions to provide control room habitability for the purpose of mitigating radiation dose consequences to personnel during post-accident conditions, and TS 3.7.7.1 is consistent with Criterion 3 of 10 CFR 50.36. Two isolation valves in the kitchen area exhaust duct are designed to close on receipt of a containment isolation signal to ensure that the control room boundary is established per design and thereby assure, in part, control room emergency ventilation system operability. The proposed revision adds components, not previously described in the specification, using the general component identification consistent with the descriptive format of other equipment contained in the existing list. The proposed revision is an administrative change that clarifies the scope and makes the explicit terms of the requirement consistent with the intent of the limiting conditions for operation.

2.2 PSL1 and PSL2 Technical Specifications, EMERGENCY CORE COOLING SYSTEMS, Surveillance Requirement (SR) 4.5.2

St. Lucie Unit 1 SR 4.5.2.e.3 and Unit 2 SR 4.5.2.f.3 each require that a periodic surveillance be performed to demonstrate operability of the containment sump recirculation actuation feature associated with the Emergency Core Cooling

Systems (ECCS). The specification for each PSL unit states [PSL2 differences shown in brackets]:

"4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

e [f]. At least once per 18 months, during shutdown, by:

3. Verifying [that] on a Sump Recirculation Actuation Test Signal, the containment sump isolation valves open and the recirculation valve to the refueling water tank closed."

Functions performed by a containment sump recirculation actuation signal include the stopping of low pressure safety injection pumps, opening containment sump isolation valves, closing the outlet valves from the refueling water tank, and closing the safety injection system recirculation valves to the refueling water tank. Although all of the proper components are explicitly identified in plant surveillance procedures for testing this ECCS feature, the omission of key component descriptions and the use of improper syntax to describe multiple, like components in the specification were identified during a quality assurance audit as items that should be corrected to provide assurance that operation of all affected components is verified.

2.2.1 Description of Changes to PSL1 SR 4.5.2.e.3 and PSL2 SR 4.5.2.f.3

On Page 3/4 5-5, under specification e [f], revise item 3. to read as follows:

- "3. Verifying that upon receipt of an actual or simulated Sump Recirculation Actuation Signal: each low-pressure safety injection pump stops, each containment sump isolation valve opens, each refueling water tank outlet valve closes, and each safety injection system recirculation valve to the refueling water tank closes."

2.2.2 Bases/Justification for Changes to PSL1 SR 4.5.2.e.3 and PSL2 SR 4.5.2.f.3

The purpose of the surveillance requirement is to demonstrate operability of the ECCS containment sump recirculation actuation feature, during shutdown, at least once per 18 months. The periodicity or the intent of the surveillance is not being changed. The proposed revision adds components, not previously described in the

specification, that are designed to respond to a recirculation actuation signal, and the general component identification is consistent with the descriptive format of other surveillances specified for the St. Lucie plant ECCS subsystems. The proposed revision is an administrative change that clarifies the scope and makes the explicit terms of the requirement consistent with the intent of the surveillance.

2.3 PSL2 Facility Operating License (O/L) NPF-16, Items 2.C.19 and 2.B.5:

Amendment No. 30 (5/10/88) to the PSL2 O/L established additional license condition 2.C.19, which reads: *"Unit No. 1 spent fuel may be transferred from the Unit No.1 spent fuel pool to the Unit No. 2 spent fuel pool, as necessary, until completion of all activities related to the increase in capacity of the Unit No. 1 spent fuel pool to 1706 spent fuel assemblies. Spent fuel assemblies transferred from the Unit 1 spent fuel pool to the Unit 2 spent fuel pool may remain in the Unit 2 spent fuel pool or be transferred back to the Unit 1 spent fuel pool."* Amendment No. 30 also revised item 2.B.5 which currently states, *"Pursuant to the Act and 10 CFR Parts 30, 40, and 70, FP&L to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of St. Lucie, Units 1 and 2."*

The PSL2 license condition resulted from the need to redesign the St. Lucie Unit 1 spent fuel pool. Following the Unit 1 refueling outage in 1987, there was no longer sufficient storage space in the PSL1 spent fuel pool to completely off-load the Unit 1 reactor core and additional spent fuel assemblies would be added to the PSL1 pool during the 1988 scheduled refueling outage compounding the problem. Re-racking the Unit 1 spent fuel pool to increase its storage capacity was authorized on March 11, 1988, and would take several months to complete. Therefore, Amendment No. 30 to the PSL2 O/L was issued to authorize the transfer of fuel between the St. Lucie units in the unexpected event that a full core off-loading of Unit 1 fuel was required or if the PSL1 spent fuel pool could not be re-racked to implement the approved redesign prior to the 1988 PSL1 refueling outage. The completion of re-racking of the PSL1 spent fuel pool would obviate the need to transfer Unit 1 fuel to the Unit 2 spent fuel pool.

2.3.1 Description of Changes to O/L NPF-16 Items 2.C.19 and 2.B.5

- a. Delete additional license condition 2.C.19, and
- b. Revise paragraph 2.B.5 to read:

"Pursuant to the Act and 10 CFR Parts 30, 40, and 70, FP&L to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of *the facility*."

2.3.2 Bases/Justification for the Changes to O/L NPF-16 Items 2.C.19 and 2.B.5

The additional license condition 2.C.19 was established by Amendment No. 30 (5/10/88) to the PSL2 O/L to allow, if necessary, the transfer of spent nuclear fuel from the St. Lucie Unit 1 spent fuel pool to the St. Lucie Unit 2 spent fuel pool, and further allow the PSL1 fuel to remain in the Unit 2 pool or transfer back to the Unit 1 pool. This provision was limited to the time required to complete all activities related to the increase in capacity of the Unit No.1 spent fuel pool to the present limit of 1706 spent fuel assemblies. Re-rack activities related to the redesign of the St. Lucie Unit 1 spent fuel pool were completed in the summer of 1988, and transfer of Unit 1 spent fuel to the Unit 2 spent fuel pool was not required. Therefore, the criteria for expiration have been achieved and license condition 2.C.19 of the PSL2 O/L is obsolete.

The proposed revision to paragraph 2.B.5 is an administrative change that simply restores the original syntax of that paragraph, i.e., restores the wording that existed prior to the temporary condition established by Amendment No. 30 to the PSL2 O/L.

2.4 PSL2 Facility Operating License (O/L) NPF-16, Paragraph 2.F

Paragraph 2.F of the PSL2 O/L states in part, "*The licensees shall report any violations of the requirements contained in Section 2, Items C.(1), C.(3) through C.(17), D. and E. of this license within 24 hours ...*" The special reporting criterion specified in this paragraph was established in the original issue of the operating license and items 2.C.4 through 2.C.17 were, in part, additional conditions that had to be satisfied prior to reaching designated milestones during the first cycle of unit operation and refueling.

2.4.1 Description of Changes to O/L NPF-16, Paragraph 2.F

Delete "through C.(17)" in the existing statement such that paragraph 2.F reads:

"The licensees shall report any violations of the requirements contained in Section 2, Items C.(1), C.(3), D. and E. of this license within 24 hours by telephone and confirm by telegram, mailgram or facsimile transmission to the NRC Regional Administrator, Region II, or his designee, no later than the first working day following the violation, with a written followup report within fourteen (14) days."

2.4.2 Bases/Justification for the Changes to O/L NPF-16, Paragraph 2.F

License conditions 2.C.4 through 2.C.9 and 2.C.12 through 2.C.17 were deleted from the facility O/L by Amendment No. 34 (9/13/88), and conditions 2.C.10 and 2.C.11 were deleted by Amendment No. 41 (5/17/89). Reference to these deleted license conditions no longer has meaning and is therefore obsolete.

2.5 PSL2 Facility Operating License (O/L) NPF-16, Paragraph 2.I

Paragraph 2.I of the PSL2 O/L reads as follows: *"In accordance with the Commission's direction in its Statement of Policy, Licensing and Regulatory Policy and Procedures for Environmental Protection; Uranium Fuel Cycle Impacts, October 29, 1982, this license is subject to the final resolution of the pending litigation involving Table S-3. See, Natural Resources Defense Council v. NRC, No. 74-1586 (D.C. Cir. April 27 1982)."*

Table S-3 is a part of the Final Environmental Statement related to the operation of St. Lucie Plant, Unit No. 2 (NUREG-0842, April 1982). At the time the facility operating license was issued (4/6/83), pending litigation in response to a series of legal challenges concerning the NRC's adoption of a series of generic rules to evaluate the environmental effects of a nuclear power plant's fuel cycle was before the United States Supreme Court. At the heart of each rule is Table S-3, a numerical compilation of the estimated resources used and effluents released by fuel cycle activities supporting a year's operation of a typical light-water reactor. There were three versions of Table S-3 that contained similar numerical values, and the cases became known as the three versions (original, interim, and final) of the "Table S-3 Rule." If the rule(s) were upheld by the court, there would be no impact on the PSL2 O/L.



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2.5.1 Description of Changes to O/L NPF-16, Paragraph 2.I

Delete paragraph 2.I from the PSL2 O/L.

2.5.2 Bases/Justification for the Changes to O/L NPF-16, Paragraph 2.I

On June 6, 1983, the U.S. Supreme Court issued a unanimous decision upholding all three versions (original, interim, and final) of the S-3 rule (Baltimore Gas and Electric Co., et al. v. NRDC, 462 U.S. 87 (1983)). As published in Federal Register 49 FR 9352 on March 12, 1984, "Accordingly, the Commission is incorporating the text of the effective S-3 rule in revised {10 CFR} Part 51...." The PSL2 operating license contingency which was made subject to the final U.S. Supreme Court decision of the pending litigation involving Table S-3 has been satisfied. Therefore, Paragraph 2.I of O/L NPF-16 is obsolete.

3.0 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.

4.0 Conclusion

The proposed changes to the PSL1 and PSL2 Technical Specifications (Appendix A to each facility operating license) provide clarification to make the explicit terms of the affected specifications consistent with the intent of existing requirements. Other changes to the PSL2 operating license simply delete superseded license conditions and serve to update the list of effective articles. The proposed amendments are administrative in nature and do not alter plant operation.

St. Lucie Unit 1 and Unit 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
License Conditions Update and TS Clarification

ATTACHMENT 2 to FPL Letter L-98-211

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION



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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of amendment request: The proposed amendments will: (a) for St. Lucie Unit 1, add the kitchen area exhaust duct isolation valves to the list of equipment identified in Technical Specification (TS) 3.7.7.1 for an operable control room emergency ventilation system; (b) for each St. Lucie unit, revise Surveillance Requirement 4.5.2 to clarify the component operations that must be verified in response to a containment sump recirculation actuation signal and; (c) for facility operating license NPF-16, delete Items 2.C.19 and 2.I, and modify items 2.B.5 and 2.F since the temporary conditions addressed by these articles have been satisfied.

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 amendments do not involve accident initiators. The changes to the Unit 1 and Unit 2 Technical Specifications provide additions and clarification to component lists to ensure that explicit terms of the affected specifications are consistent with existing requirements. Other changes to the Unit 2 facility operating license simply delete superseded license conditions that have been previously satisfied and are therefore obsolete. The revisions do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do the changes alter any assumptions or conditions in the plant safety analyses. 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.



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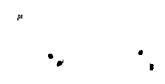
(2) Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendments are administrative in nature and will not change the physical plant or the modes of operation defined in the facility operating licenses. The changes do not involve the addition or modification of equipment nor do they alter the design or operation 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 changes proposed for the Unit 1 and Unit 2 Technical Specifications provide additions and clarification to component lists to ensure that explicit terms of the affected specifications are consistent with existing requirements. Other changes to the Unit 2 facility operating license simply delete superseded license conditions that have been previously satisfied and are therefore obsolete. The revisions do not alter the plant safety analyses or 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 unit 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.



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