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SUBJECT: Documents licensee commitment to revise Operating Procedure (OP) 2-1600023,Rev 58, "Refueling Sequencing Guidelines,Step 8.17," subsequent to issuance of proposed license amend re SFP storage capacity & soluble boron credit.

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Florida Power & Light Company, 6351 S. Ocean Drive, Jensen Beach, FL 34957

January 28, 1999

L-99-007
10 CFR 50.90

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

Re: St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment: SFP Storage Capacity;
Soluble Boron Credit (TAC No. MA0666); Full Core Offload

Ref: (1) FPL Letter L-97-325, J. A. Stall to NRC (DCD): Proposed License Amendment, SFP Storage Capacity; Soluble Boron Credit; December 31, 1997.

(2) FPL Letter L-98-132, Rajiv S. Kundalkar to NRC (DCD): Proposed License Amendment: SFP Storage Capacity; Soluble Boron Credit (TAC No. MA0666), Response to Request for Additional Information; May 15, 1998.

(3) FPL Letter L-98-221, J.A. Stall to NRC (DCD): Proposed License Amendment: SFP Storage Capacity; Soluble Boron Credit (TAC No. MA0666); Summary of June 18 and July 24, 1998 Teleconferences; September 15, 1998.

(4) FPL Letter L-98-294, J.A. Stall to NRC (DCD): Proposed License Amendment: SFP Storage Capacity; Soluble Boron Credit (TAC No. MA0666); Supplement; November 25, 1998.

Florida Power and Light Company (FPL) requested an amendment to the St. Lucie Unit 2 operating license that would allow an increase in the capacity of the spent fuel pool (SFP), in part, by taking credit for a certain soluble boron concentration in the pool coolant (Reference 1). In References 2 and 3, FPL provided additional information to the NRC staff in connection with that amendment request. Reference 4 is a supplement to the original submittal and includes proposed revisions to Technical Specification 3/4.9.11. In a telephone conference held between the NRC staff (Gleaves, et al.) and FPL (Madden, et al.) on January 6, 1999, the Unit 2 spent fuel pool cooling system capabilities were discussed. As a result of the tele-conference, FPL is providing this letter to document our commitment to incorporate a procedural requirement which assures that, prior to commencing a full core off-load, an outage-specific engineering evaluation will be completed which demonstrates that the spent fuel pool coolant temperature will remain less than or equal to 150°F during the full core discharge while assuming a cooling capacity equivalent to a single train of the SFP cooling system.

Operating Procedure (OP) 2-1600023, Revision 58, *Refueling Sequencing Guidelines*, Step 8.17, provides prerequisites for performing a total core off-load. Each prerequisite must be met prior to removing the first fuel assembly from the reactor vessel. As discussed in Reference 3, the Total Core Offload step is annotated to reference the engineering safety evaluation that serves as the source document from which the prerequisites evolved, and thereby assures that the stated prerequisites are not changed without proper evaluation (as required by 10 CFR 50.59), review, and approval. Sub-steps 8.17.5 and 8.17.6 require two fuel pool cooling pumps to be in operation and specifies the maximum allowed fuel pool decay heat load, respectively. Sub-step 8.17.7 currently requires that the "Maximum Fuel Pool temperature with one Fuel Pool Cooling Pump in operation has been determined to not exceed 140°F during the Core Offload Evolution." An individual must initial each sub-step signifying that the stated requirement is met.

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Subsequent to issuance of the proposed license amendment and prior to the next St. Lucie Unit 2 refueling outage, FPL will revise OP 2-1600023. The revision will include a total core off-load prerequisite that requires an outage-specific engineering evaluation to have been completed which demonstrates that the maximum fuel pool temperature will not exceed 150°F during the core off-load evolution while assuming a cooling capacity equivalent to a single train of the SFP cooling system.

Please contact us if there are additional questions about this matter.

Very truly yours,

J. A. Stall
Vice President
St. Lucie Plant

JAS/RLD

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