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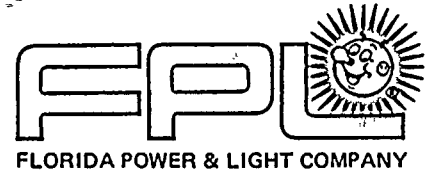
ACCESSION NBR:8405310309 DOC.DATE: 84/05/22 NOTARIZED: YES DOCKET #
 FACIL:50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH.NAME AUTHOR AFFILIATION
 WILLIAMS,J.W. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 EISENHUT,D.G. Division of Licensing

SUBJECT: Application for amend to License NPF-16, revising Tech Specs to extend subgroup test interval from 6 to 18 months.

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May 22, 1984

L-84-133

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit 2
Docket No. 50-389
Proposed License Amendment
Emergency Safety Features Actuation
System Instrumentation - Surveillance Requirements

In accordance with 10 CFR 50.90, Florida Power & Light Company submits herewith three signed originals and forty copies of a request to amend Appendix A of Facility Operating License NPF-16.

This Amendment is submitted to extend the subgroup test interval from six to 18 months. The Safety Evaluation accompanying this request demonstrates that the availability of a typical actuation channel (SIAS) is insensitive to the change in the test interval (0.03% change in availability). In addition, the evaluation of the changed test interval demonstrates only a change in the availability of the Auxiliary Feedwater Actuation System (AFAS) by 0.02%.

The proposed Amendment is described below and shown on the accompanying Technical Specification pages.

Pages 3/4 3-22 and 3/4 3-23

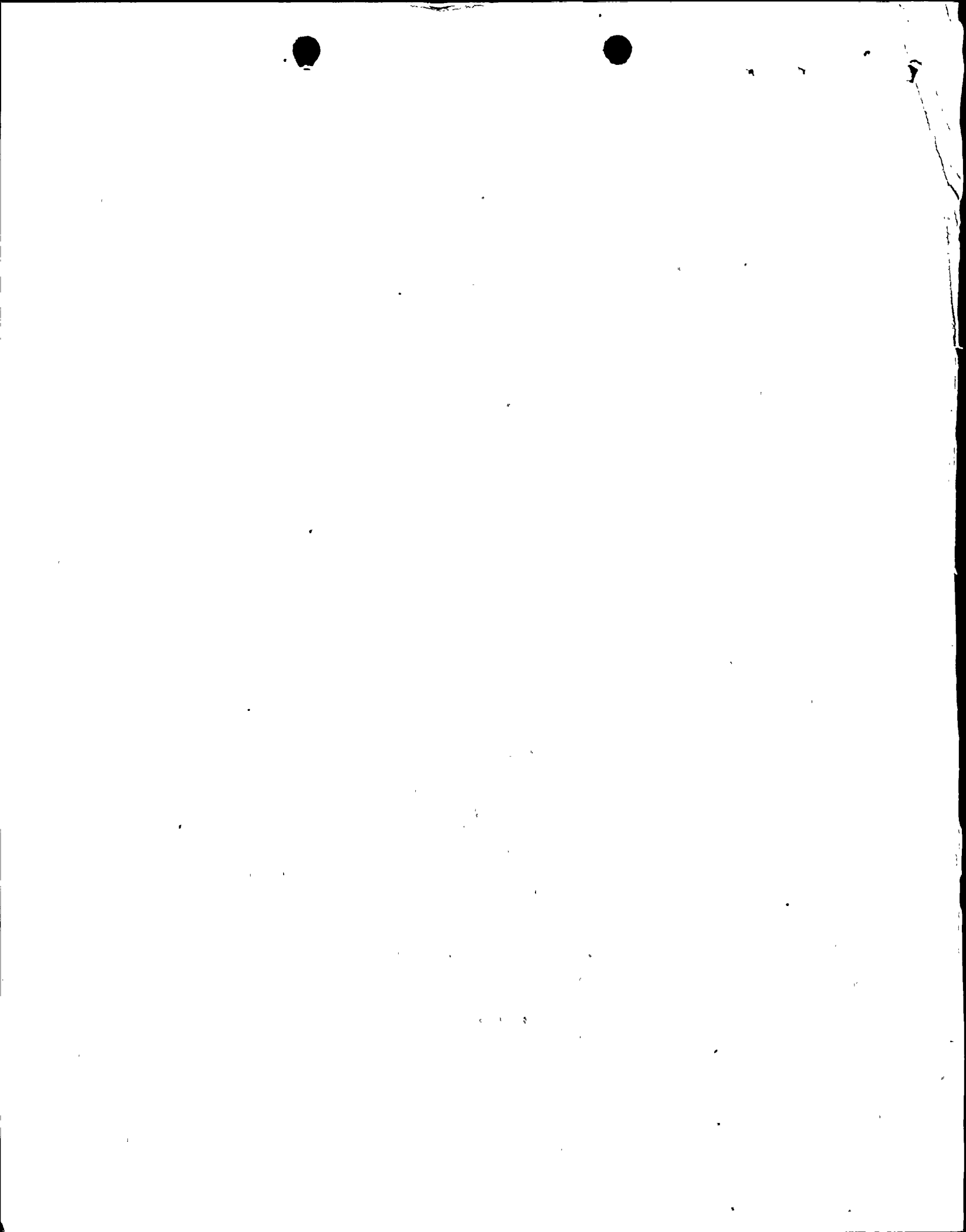
The surveillance requirements on subgroup relay testing have been changed from semi-annual to every refueling (eighteen months).

In accordance with 10 CFR 50.92, we have determined that the proposed Technical Specification Amendment involves no significant hazards considerations in that it does not:

1) 10 CFR 50.92(c)(1)

Involve a significant increase in the probability or consequences of an accident previously evaluated since the safety evaluation demonstrates that the extension of the test interval does not reduce the availability of the actuation channel in any significant amount (0.03% change in availability for ESFAS and 0.02% change for AFAS). Therefore the operation and availability of the Emergency Safety Features Actuation System (ESFAS) Instrumentation remains the same as considered in all safety analyses.

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2) 10 CFR 50.92(c)(2)

Create the possibility of a new or different kind of accident from any accident previously evaluated since there are no design changes proposed in this Amendment, and since the operation and availability of the ESFAS remains unchanged.

2) 10 CFR 50.92(c)(3)

Involve a significant reduction in a margin of safety in that the availability of the ESFAS actuation channel is insensitive to the change in the test interval. The 0.03% and 0.02% change in availability of the channel does not involve any significant reduction in a margin of safety.

In addition, the proposed Amendment meets the following examples of Amendments that are considered not likely to involve significant hazards considerations as listed in the Federal Register (Vol. 48, No. 67):

Example iv: A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met.

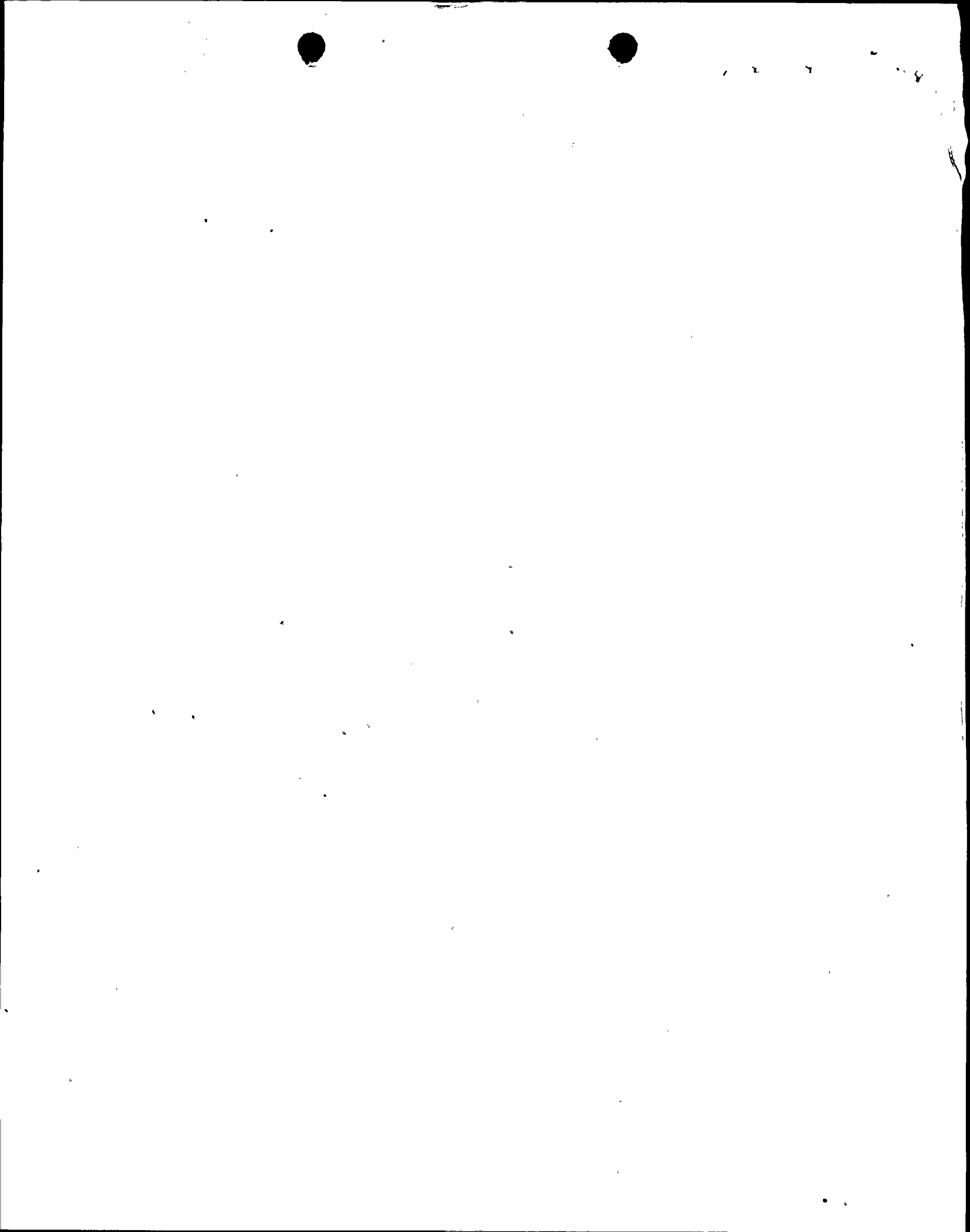
The proposed Amendment justifies the relief from the ESFAS subgroup relay testing interval previously approved in the Technical Specifications. The analysis demonstrates that the proposed changes resulted in virtually no change in the availability of the actuation channel. The analysis was performed using standard acceptable methodology as described in NUREG/CR-2300 (PRA Procedures Guides) and IEEE-STD 352-1975 (Guide for General Principles of Analysis of Nuclear Power Generating Station Protection Systems).

Example (vi): A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method.

The proposed Amendment would not result in reduction in the safety margin. The availability of the ESFAS channels are insensitive to the change in the test interval.

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.



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The proposed Amendment has been determined to be a Class III Amendment in accordance with 10 CFR 170.22, and a check for \$4,000.00 will follow shortly.

Very truly yours,



for J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/JEM/js

Attachment

cc: J. P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30303

Harold F. Reis, Esquire

Lyle Jerrett, Ph.D., Director
Office of Radiation Control
Dept. Health & Rehabilitative Services
1317 Winewood Boulevard
Tallahassee, FL 32301

PNS-LI-84-177

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

C. O. Woody, being first duly sworn, deposes and says:

That he is Vice President Nuclear Operations 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.

..... C. O. Woody
C. O. Woody

Subscribed and sworn to before me this

22 day of MAY, 1984.

.....
John J. McCallum

NOTARY PUBLIC, in and for the County of Dade, State of Florida.

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. FEB 14, 1988
BONDED THRU GENERAL INS. UND.

My commission expires: 2-14-88

OFFICE OF THE
SHERIFF
COUNTY OF
GREGG
MAY 10 1964