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SUBJECT: Application for amends to licenses DPR-67 & NPF-16, respectively,utilizing guidance of GL 89-01, "Implementation of Programmatic Controls for Radiological Effluent TSs" & NUREG 1301, "ODCM:SREC for PWRs."

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JAN 22 1993

L-92-329
10 CFR 50.90

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

Gentlemen:

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (Generic Letter 89-01)

In accordance with 10 CFR 50.90, Florida Power & Light Company (FPL) submits a request to amend Facility Operating Licenses DPR-67 and NPF-16 for St. Lucie Units 1 and 2, respectively.

These proposed license amendments have been developed utilizing the guidance of GL 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications" and NUREG 1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors." As such, the procedural details of the Radiological Effluent Technical Specifications (RETS) have been relocated to the Offsite Dose Calculation Manual (ODCM) or Process Control Program (PCP) as appropriate per the Administrative Controls section of the Technical Specifications. In addition, new programmatic controls for radioactive effluent and radiological environmental monitoring have been added to the Technical Specifications (TS).

The ODCM has been revised in accordance with the proposed changes to the Administrative Controls section of the TS so it may be implemented immediately upon issuance of the amendments. Wherever possible, the standard TS wording of NUREG 1301 was used in the controls section of the ODCM. Deviations from the NUREG 1301 wording are marked and explained in Enclosure 1. Current St. Lucie TS setpoints, LCOs, and surveillance requirements were not changed. The TS bases of NUREG 1301 were used in the ODCM in lieu of St. Lucie TS bases.

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Attachments 1 and 2 to this letter include the proposed St. Lucie Units 1 and 2 Technical Specification changes, respectively. Attachment 3 is a Safety Analysis in support of the proposed amendments. Attachment 4 is a "Determination of No Significant Hazards Consideration." Enclosure 1 is a copy of the revised ODCM and NUREG 1301 deviation document.

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), a copy 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,

D. A. Sager

D. A. Sager

Vice President
St Lucie Plant

DAS/JWH/kw

DAS/PSL #836-93

Attachments
Enclosure

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant
Mr. Jacob D. Nash, Florida Department of Health and Rehabilitative Services

St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (Generic Letter 89-01)
Page three

STATE OF FLORIDA)
) ss.
COUNTY OF ST. LUCIE)

D. A. Sager 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.

D A Sager
D. A. Sager

STATE OF FLORIDA

COUNTY OF St. Lucie

The foregoing instrument was acknowledged before me this 22nd day of January, 19 93 by D. A. Sager, who is personally known to me and who did take an oath.

Karen West
Karen West
Name of Notary Public

My Commission expires 4-18-94

Commission No. CC003229

KAREN WEST
Notary Public-State of Florida
My Commission Expires APR 18,1994
COMM # CC 003229

St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (Generic Letter 89-01)

ENCLOSURE 1

OFFSITE DOSE CALCULATION MANUAL

AND

DEVIATION DOCUMENT

FOR

ST. LUCIE UNITS 1 AND 2

9302010127

DEVIATION DOCUMENT FOR ST. LUCIE UNITS 1 AND 2 ODCM

This deviation document is provided to assist in the review process since the ODCM submittal attempts to use the standard TS wording of NUREG-1301 wherever possible. It explains the deviations from NUREG-1301 wording based on site specific design and instances where the current Plant Technical Specifications have additional or more restrictive requirements than those given in NUREG-1301. The St. Lucie ODCM submittal copy has margin notes keyed to these explanations.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
1	9	5	Naming CHANNEL FUNCTIONAL TEST as title instead of 1301's name of ANALOG CHANNEL OPERATIONAL TEST. The definition is identical. This is needed for human factors. This will keep us from having a Common Effluent & Accident Channel with two different names for a functional test.
2	9	5	CHANNEL CALIBRATION definition uses the current Plant TS wording, not 1301's. Our's is about equivalent & even includes CHANNEL FUNCTIONAL TEST. Same human factors concern as the item immediately above.
3	14 29 35 37	12 39 46 48	TABLE 1.1 FREQUENCY 4/M* is our current TS. We are not changing the frequency to that of NUREG 1301.
4	14	12	** - To clarify when P is required. Our current TS wording.
5	15	13	1301 TABLE 1.2 "OPERATIONAL MODES" is not in submittal. Effluents Monitors OPERABLE status are not affected by MODE changes. Therefore, the Table is not needed.
6	15	15	1301 3/4 CONTROLS & SURVEILLANCE REQUIREMENTS "APPLICABILITY" for 3.0.3, 3.0.4, 4.0.3, 4.0.4, and 4.0.2.b are not included in submittal. See item immediately above for same reasons. The Surveillance Frequency maximum allowable extension in all other STS is 25% per interval only and not 25% per 3 consecutive intervals.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
7	16 21 28 32 33 34 38 39 40 42 49 57 59	15 24 38 42 43 45 49 50 51 55 57 68 70	1301's Action: "The provisions of Controls 3.0.3 and 3.0.4 are not applicable" is NOT included in any Control Statement in the ODCM. See above two items for reasons.
8	17 19 22 25	18 21 25 32	The ODCM Inst. Table(s) only include those Monitors that are Design Base Applicable to St. Lucie. Refer to the same 1301 Table No. to see which exclusions were made for the Table of interest. Instruments same as our current plant TS.
9	17 18 22 23 24	18 20 28 29 31	MINIMUM CHANNELS OPERABLE in this Table is N.A. due to Design Base Applicability. By NOT having a 1301 instrument to measure Flow Rate, the ACTION requirement specified in the ODCM submittal is different than 1301's, and uniquely spells out what the plant must do to insure release conditions are controlled conservatively. The wording of this ACTION Statement in this Table is our current TS Wording.
10	18	20	1301 specifies 1.E-07 micro-Curie/ml detection limit. Current Plant TS is 2.0E-07.
11	20	23	1301 has Notes (1) thru (4) and the ODCM omits the 1301 Note (2), which is N.A. since all our liquid effluent monitors fall under NOTE 1's type.
12	20 27	23 37	1301 suggest purchasing calibration sources from vendors who participate in NIST cross check programs etc. We will keep the current Plant TS Note for this table which requires vendors who are traceable to NIST.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
13	22 24 27	26 30 32	1301 APPLICABILITY is "*". By Design, PSL's Air Ejectors may be, and are normally aligned, to the Plant Vent(s) where the Plant Vent Monitor provides the required monitoring function at all times. The ODCM APPLICABILITY of "**" takes credit for this capability. See TABLE NOTATION for the actual statement.
14	22 25	26 33	1301 items b. thru e. N.A. to St. Lucie since air ejector is only a Noble Gas Monitor.
15	24	30	1301 has a Notation "**", but it does NOT apply on 1301's Table 3.3-13 list of Instrumentation.
16	24 27	30 32	1301 Notation "* - At all times" vs the ODCM submittal's "* - At all times while making releases via this pathway" to take credit for being able to administratively tag out some ventilation system fans, etc.
17	29	39	1301 has SAMPLING FREQUENCY as Continuous vs ODCM Daily. Design Base of St. Lucie does not provide for Continuous collection of a composite sample. 1301 has Note (6). <u>We use the current plant TS.</u>
18	29	39	1301 has SAMPLING FREQUENCY "M" Grab Sample vs ODCM Daily Grab Sample for dissolved and entrained gases <u>as per current plant TS</u>. 1301 has MINIMUM ANALYSIS FREQUENCY of "M" (for Monthly) vs ODCM 4/M from the composite <u>as per the current plant TS</u>.
19	32 33 38 39 40 42 48	42 43 49 50 51 55 56	1301 in the ACTION Statement "Control 6.9.2" vs ODCM "Plant TS 6.9.2" where TS 6.9.2 deals with Special Reports. We prefer TS to be the recognized document.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
20	32	42	1301 Drinking Water Analysis, etc. is not in the current plant TS or ODCM due to St. Lucie not being a fresh water site. Therefore, Footnote "*" was omitted from ODCM.
21	35	46	1301 "Type of Activity Analysis" specifies Principal Gamma Emitters. The ODCM says "Noble Gas P.G.E" as our current plant TS Note "e" for this table "exclusively" list certain Nuclide LLD's for gaseous samples. Our Design Bases is that the Plant Vent Particulate and Charcoal Continuous Sampling device is a common collection point for all Waste Gas Storage Tank and Containment Purge release pathways, hence we meet the NRC's requirement to perform all analysis required by 1301's Table 4.11-2.
22	35	46	1301's Note (3) is Note (6) in the ODCM. i.e., extra samples required within one hour of a > 15 % Reactor Power Change ...."as per current plant TS wording.
23	35	46	1301's Note (4) is not included in ODCM. It is 24 hour frequency Tritium Sample when the refueling canal is flooded. This is not in current Plant TS. Tritium Levels have not been observed above 1.E-06 uCi/cc for years under any Operational Mode. We sample 4/M at a sensitivity of 4.E-08 uCi/cc, well below the required LLD of 1.E-06 etc.
24	35	46	1301 "4. All Release Types as listed in 1, 2, and 3 above" vs ODCM's "in 3. above". This is explained by Deviation # [21], where Waste Gas Storage Tanks & Containment are covered by Plant Vent Continuous Collection.
25	35	46	1301's wording is confusing on this line, but the ODCM is using the current Plant TS wording under respective column topics. This is the continuous analyses for Noble Gases by a monitor etc.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
26	40	51	1301's 3.11.2.4. states "c. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC". ODCM uses "c. 0.3 mrem to any organ." as our current Plant TS is worded. "at or beyond the site boundary" is inclusive of all, including MEMBERS OF THE PUBLIC.
26a	40	51	The GASEOUS RADWASTE TREATMENT Control Statement 3.11.2.4 Surveillance Statement 4.11.2.4.1

The Deviation briefly stated is:

There is an Editorial Difference, concerning the physical description for the location(s) of where the Limit(s) apply for the St. Lucie Site, between the Current Tech Spec and NUREG-1301.

What the Current Tech Spec states: Page 3/4 11-13

"..when the projected gaseous effluent air doses due to gaseous effluent releases from the site to UNRESTRICTED AREAS(see Figure 5.1-1), when averaged over 31 days, would exceed:"

What the ODCM Submittal states: Page 40

"..when the projected doses in 31 days due to gaseous effluent releases, from each unit, to areas at and beyond the SITE BOUNDARY(see Figure 5.1-1), would exceed:".

Explanations:

The ODCM wording is as per page [51] of NUREG-1301 "ODCM Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors". The Plant Staff feels that NUREG-1301's guidance in specifying "to areas at and beyond the SITE BOUNDARY(see Figure 5.1-1)" is correct for this St. Lucie Plant ODCM Control. To further support this position,

(continued)

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
			The GASEOUS RADWASTE TREATMENT Limits for operability are tied to LCOs 3.11.2.2 "DOSE - NOBLE GASES" and 3.11.2.3 "DOSE - IODINE -131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM" where each of the LCO's use "to areas at and beyond the SITE BOUNDARY", (see Figure 5.1-1)" as their controlling location for applicability. Logically, related LCOs should also have the same point of applicability.
			Conclusion:
			The Plant Staff feels that the wording differences between current TS and NUREG-1301 are editorial in nature and that the intent of the Tech Spec GASEOUS RADWASTE TREATMENT LCO is not diminished by using the wording of NUREG-1301 in the ODCM Submittal. Surveillance 4.11.2.4.1 was not discussed since it must follow the wording of the Control Statement.
27	48	56	1301 ACTION b. Our ODCM uses "With the confirmed* level..." This is our current TS wording.
28	50	58	1301 specifies 40 Monitoring Locations and the ODCM submittal states only 27 Locations. Seven of 16 Sectors are over water; Locations are based on 1, 5, and 10 mile Rings, each Sector over land, proximity to residences and accessibility. This is our current TS wording.
29	50	59	1301 specifies composite and the ODCM submittal states Grab Samples Weekly/Monthly. The effluent flow (Circ Water) by parameters of the Ocean are fairly constant, a grab sample would suffice. This is our current TS wording.
30	50	60	1301 Table 3.12-1 Item 3d is ODCM Item 3b. 1301 requires one location, ODCM uses two locations. This is our current TS wording. ODCM uses 1 for indicator and 1 for a control. Same situation for ODCM Table 3.12-1 Item 4a. for Crustacea and Fish.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
31	50	60	1301 Table 3.12-1 Item 4a: Milk Samples: ODCM does not address as no suitable milk animal within 5 km, no sizable milk animal herd from 5 to 8 km. Our current TS wording.
32	50	61	1301 Table 3.12-1 4b/ODCM 4a 1 & 2; 1301 specifies "Edible Portion", ODCM does not. Although for fish the edible portion is about 50% of the weight, the organs are excellent indicators of contamination. For the crustacea sampled the same logic is applied {organs as indicators}. Our current TS wording.
33	50	61	1301 Table 3.12-1 4c: Food Products irrigated by effluent affected waters; the current TS wording or ODCM do not address as St. Lucie Effluent is discharged to the Ocean which is not used for irrigation.
34	50	61	1301 Table 3.12-1 4c/ODCM 4b 1: 1301 specifies "3 kinds" of broad leaf vegetation (BLV), Current Plant TS and ODCM have no "kinds" specified. Other than decorative foliage, the area close to the plant (the island) is limited on the variety of BLV although the sampling program permits a variety of BLV to be sampled. Basically, mangrove is the only plant common to the plant area.
35	53	64	ODCM Table 3.12-2 "Reporting Levels for Radioactivity Concentrations in Environmental Samples" uses the current Plant Tech Spec Reporting Level Values. There are no differences in 1301 and the current Plant TS, its just how the limit is listed relative to Drinking Water being present or not. Using the current TS wording avoids giving the appearance that a limit has been changed in the ODCM submittal process. Drinking Water is not applicable to the St. Lucie Site.

Dev. [#]	St.L ODCM PAGE	NUREG 1301 PAGE	DESCRIPTION OF DEVIATION
36	54	65	ODCM Table 4.12-1 "Detection Capabilities.." uses current Plant TS LLDs prescribed for Tritium and I-131 and their respective footnotes "*" and "**". There are no differences in 1301 and the current Plant TS, its just how the limit is listed relative to Drinking Water being present or not. Using the current TS wording avoids giving the appearance that a limit has been changed in the ODCM submittal process.
37	57	68	1301's 3.12.2 includes wording for: "if elevated releases then ...etc. This was not included in ODCM since by Design Bases we do not have any elevated release points by definition.
38	57	68	1301 3/4.12.2 LAND USE CENSUS, the footnote of 1301 page 68 includes "of at least three kinds of vegetation." The ODCM does not specify three kinds, but uses current Plant TS. See Deviation 34 above for explanation.
39	59	70	ODCM in 3.12.3 has an "*" on "Commission" for the ODCM footnote, and 4.12.3 explains the description of the Interlaboratory Comparison Program not being included in the ODCM as long as the Environmental Protection Agency is the ILC Program of record. The EPA program is a well known NRC approved program and the requirement for a description of the EPA program should not be needed. We, the State of Florida (HRS), participate in the EPA ILC Program. The ODCM uses the current Plant TS wording.
40	65	75	ODCM in BASES for 3/4 11.2.1 DOSE RATE, does not include the NUREG 1301 sentence "Examples of calculations for such MEMBERS OF THE PUBLIC, with appropriate occupancy factors, shall be given in the ODCM" because current Plant TS Semiannual Report requires us to do actual visitor assessment for each annual reporting interval.