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 SAGER, D.A. Florida Power & Light Co.
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SUBJECT: Application for amends to licenses DPR-67 & NPF-16, incorporating encl administrative changes.

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October 27, 1994

L-94-198
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
Administrative Update

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 and NPF-16 for St. Lucie Unit 1 and Unit 2, respectively, by incorporating the attached administrative changes. The proposed amendments will improve consistency throughout the Technical Specifications and their related Bases by removing outdated material and blank pages, incorporating minor changes in text, making editorial corrections, and resolving other inconsistencies identified by the plant operations staff.

It is requested that the proposed amendments, if approved, be issued by May 31, 1995.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain copies of the appropriate 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,

D. A. Sager
Vice President
St. Lucie Plant

DAS/RLD

Attachments

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

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Page 2

cc: Stewart D. Ebnetter, 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
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Administrative Update

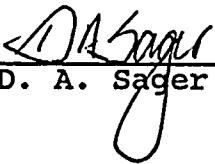
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STATE OF FLORIDA)
)
COUNTY OF ST. LUCIE) ss.

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

STATE OF FLORIDA
COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 27th day of October, 1994 by D.A. Sager, who is personally known to me and who did take an oath.



KAREN WEST
Name of Notary Public

My Commission expires 4-18-98
Commission No. CC359926

 KAREN WEST
MY COMMISSION # CC359926 EXPIRES
April 18, 1998
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WASHINGTON, D.C.



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

ATTACHMENT 1

EVALUATION OF PROPOSED TS CHANGES

.9411020149



EVALUATION OF PROPOSED TS CHANGES

Introduction

Florida Power and Light Company (FPL) requests that Appendix A of Facility Operating License DPR-67 for St. Lucie Unit 1 (PSL1) and NPF-16 for St. Lucie Unit 2 (PSL2) be revised to incorporate the administrative improvements described herein. The proposed changes will improve consistency throughout the Technical Specifications (TS) and their related Bases by removing outdated material and unnecessary blank pages, incorporating minor changes in text for purposes of clarification, making editorial corrections, and resolving other inconsistencies identified by the plant operations staff.

1. PSL1 Proposed TS Changes and Justifications

a. The following changes in text will improve consistency within the PSL1 TS by revising and/or deleting outdated material, providing proper references, and correcting spelling and/or nomenclature errors.

(1) On Page Ia: Add "TABLE 1.1 Frequency Notation ... 1-8" and "TABLE 1.2 Operational Modes ... 1-9." The location of these topics is not otherwise identified in the index.

(2) On Page III:

a) Under 3/4.1 REACTIVITY CONTROL SYSTEMS, revise "Shutdown Margin - $T_{axg} > 200$ °F" to read, "Shutdown Margin - $T_{avg} > 200$ °F" and thereby reflect the proper subscript for average temperature.

b) Under 3/4.1.2 BORATION SYSTEMS, revise the page reference for "Borated Water Sources - Operating" from "3/4 1-4" to read "3/4 1-18."

(3) On Page IV: Under 3/4.3 INSTRUMENTATION, delete "Fire Detection Instrumentation ... 3/4 3-37". This TS was deleted by Amendment 115.

- (4) On Page V, under 3/4.4.10 STRUCTURAL INTEGRITY:
- a) Revise "Safety Class 1 Components" to read, "ASME Code Class 1, 2, and 3 Components."
 - b) Delete "Safety Class 2 Components ... 3/4 4-37" and "Safety Class 3 Components ... 3/4 4-53."

These requirements were merged into one specification pursuant to Amendment 90.

- (5) On Page VI: Under 3/4.7 PLANT SYSTEMS, delete "Secondary Water Chemistry ... 3/4 7-10." This TS was deleted by Amendment 86.

- (6) On Page VII:

- a) Delete the entire section, "3/4.7.11 FIRE SUPPRESSION SYSTEMS" and the referenced pages.
- b) Delete "3/4.7.12 PENETRATION FIRE BARRIERS ... 3/4 7-45."

The specifications were deleted by Amendment 115.

- (7) On Page IX: For Bases Section 3/4.2.2, replace the words "TOTAL PLANAR RADIAL PEAKING FACTOR" with the word, "DELETED." This TS and its bases were deleted by Amendment 109.

- (8) On Page X: For Bases Section 3/4.5.4, revise "REFUELING WATER STORAGE TANK (RWST)" to read, "REFUELING WATER TANK (RWT)." The proposed wording reflects the proper nomenclature for PSL1 and is consistent with both the TS and the Bases Section for this system.

- (9) On Page XI:

- a) Delete "3/4.7.11 FIRE SUPPRESSION SYSTEMS...B 3/4 7-7."

- b) Delete "3/4.7.12 PENETRATION FIRE BARRIERS ... B 3/4 7-7."

The Bases sections were deleted by Amendment 115.

(10) On Page XII:

- a) Under 3/4.11 RADIOACTIVE EFFLUENTS:

- i) Replace "LIQUID EFFLUENTS" with the word "DELETED."
ii) Replace "3/4.11.2 GASEOUS EFFLUENTS ... B 3/4 11.2" with "3/4.11.2.5 EXPLOSIVE GAS MIXTURE ... B 3/4 11-4."
iii) Replace "3/4.11.3 SOLID RADIOACTIVE WASTE" with "3/4.11.2.6 GAS STORAGE TANKS".
iv) Delete "3/4.11.4 TOTAL DOSE ... B 3/4 11-5."

- b) Delete the entire section 3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING.

The Bases sections were revised by Amendment 123.

- (11) On Pages XIII, XIV, and XV: Revise the page references as shown in Attachment 3 to this submittal. The topics do not appear on the pages presently indicated.

- (12) On Page 3/4 2-2: In the footnote #, revise "core" to read "incore" and the referenced Specification "4.2.1" to read "4.2.1.3".

The proposed changes will correct the footnote to reflect the proper system nomenclature and the appropriate reference specification. PSL1 has no TS number 4.2.1; and if the incore system is inoperable, linear heat rate would be monitored by the excore system per TS 4.2.1.3.

- (13) On Page 3/4 3-25, Surveillance Requirement 4.3.3.2.a.2: Revise the reference specification "4.2.1.3" to read "4.2.1.4."

The proposed change rectifies an improper reference. TS 4.2.1.4 is the proper reference for the incore monitoring system.



(14) On Page 3/4 3-44, TABLE 4.3-7: In item 6, revise "postition" to properly read "position."

b. The following reorganization of text will restore coherency to the tabular format of TS 3/4.3.3.10.

(1) On Page 3/4 3-51, TABLE 3.3-13: As shown in Attachment 3 to this submittal, incorporate all of the TABLE NOTATION text that is currently printed on Page 3/4 3-53 (Amendment 123).

TABLE 3.3-13 was fragmented as a result of deletions made pursuant to Amendment 123. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format.

(2) On Page 3/4 3-52: Delete the word "DELETED". On this page as shown in Attachment 3 to this submittal, incorporate all of the TABLE 4.3-9 text that is currently printed on page 3/4 3-54 (Amendment 123), and all of the associated TABLE NOTATION text that is currently printed on Page 3/4 3-56 (Amendment 123).

TABLE 4.3-9 was fragmented as a result of deletions made pursuant to Amendment 123. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format. Printing TABLE 4.3-9 in its entirety on page 3/4 3-52 will facilitate deletion of blank pages without interrupting the continuity of pagination, per item 1.d.(3) below.

c. The following changes in text will provide accountability for the applicable pages listed in section 1.d that FPL has selected for deletion from the technical specifications.

- (1) On Page 3/4 3-37: Replace the word "DELETED" with the text, "Pages 3/4 3-38 through 3/4 3-40 (Amendment No. 115) have been deleted from the Technical Specifications."
- (2) On Page 3/4 3-45: Replace the word "DELETED" with the text, "Pages 3/4 3-46 through 3/4 3-49 (Amendment No. 123) have been deleted from the Technical Specifications"
- (3) On Page 3/4 4-27: Replace the word "DELETED" with the text, "Pages 3/4 4-28 through 3/4 4-55 (Amendment No. 90), and Pages 3/4 4-56 through 3/4 4-57 (Amendment No. 80) have been deleted from the Technical Specifications."
- (4) On Page 3/4 7-10: Replace the words "THIS PAGE LEFT INTENTIONALLY BLANK" with the text, "Pages 3/4 7-11 through 3/4 7-12 (Amendment No. 86) have been deleted from the Technical Specifications."
- (5) On Page 3/4 11-1: Replace the word "DELETED" with the text, "Pages 3/4 11-2 through 3/4 11-13 (Amendment No. 123) have been deleted from the Technical Specifications."
- (6) On Page B 3/4 11-1: Add the words, "Pages B 3/4 11-2 through B 3/4 11-3 (Amendment No. 123) have been deleted from the Technical Specifications."

The text proposed in each of the above items will preserve the continuity of pagination. The pages that are referred to in the text are blank, and will be removed from the TS.

d. FPL proposes to delete the following blank pages from the PSL1 Technical Specifications.

- (1) Delete pages 3/4 3-38 through 3/4 3-40 (Amendment 115).
- (2) Delete pages 3/4 3-46 through 3/4 3-49 (Amendment 123).
- (3) *Delete pages 3/4 3-53 through 3/4 3-56 (Amendment 123).
The existing text on pages 3/4 3-54 and 3/4 3-56 will appear on page 3/4 3-52 per item 1.b.(2) above.
- (4) Delete pages 3/4 4-28 through 3/4 4-55 (Amendment 90) and pages 3/4 4-56 through 3/4 4-57 (Amendment 80).
- (5) Delete pages 3/4 7-11 through 3/4 7-12 (Amendment 86).
- (6) *Delete pages 3/4 7-32 through 3/4 7-39a (Amendment 83).
- (7) Delete pages 3/4 11-2 through 3/4 11-13 (Amendment 123).
- (8) *Delete pages 3/4 11-16 through 3/4 11-17 (Amendment 123).
- (9) *Delete pages 3/4 12-1 through 3/4 12-12 (Amendment 123).
- (10) Delete pages B 3/4 11-2 through B 3/4 11-3 (Amendment 123).
- (11) *Delete pages B 3/4 12-1 through B 3/4 12-2 (Amendment 123).

Except as noted by *, continuity of pagination will be preserved by a note on the page immediately preceding each page group as proposed in section 1.c above.

* Pages denoted by a single asterisk are the last pages in the applicable TS section, and deletion of these pages will not interrupt the page numbering sequence.

- e. The following changes in text will rectify errors in the stated ranges for the PSL1 Radioactivity RCS Leakage Detection instruments listed in TABLE 3.3-6.

On Page 3/4 3-22, TABLE 3.3-6:

- (1) For item 2.a.i, Gaseous Activity RCS Leakage Detection, change the indicated MEASUREMENT RANGE from " $10^{-7} - 10^{-2}$ $\mu\text{Ci/cc}$ " to properly read, " $10 - 10^6$ cpm."
- (2) For item 2.a.ii, Particulate Activity RCS Leakage Detection, change the indicated MEASUREMENT RANGE from " $1 - 10^6$ cpm/hr" to properly read, " $10 - 10^6$ cpm."

The ratemeters for both of the above listed instruments have measurement ranges of $10 - 10^6$ cpm. The ranges currently listed in TABLE 3.3-6 for these instruments are the result of an inadvertent revision made pursuant to Amendment 59, which incorporated Radiological Effluent Technical Specifications for PSL1 modeled as close as practicable to those of PSL2. This proposed change will rectify that error by restoring the listed measurement ranges to their original values which are consistent with the PSL1 plant configuration.

- f. The following minor change in text will correct errors in the stated secondary system design pressure and the basis for operability of Main Steam Safety Valves found in Bases Section 3/4.7.1.

On Page B 3/4 7-1, under Section 3/4.7.1.1 SAFETY VALVES: In the first sentence, revise "...limited to within its design pressure of 1025 psig..." to read, "...limited to within 110% of its design pressure of 1000 psia..."

The PSL1 steam generator design pressure is 1000 psia. The plant safety analyses demonstrate that the existing lift setpoints for the safety valves satisfy the acceptance criteria by limiting steam generator pressure to less than 110% of design during the postulated worst case over-pressurization transient. The proposed change in text will more accurately reflect the Bases for TS 3/4.7.1.1.

- g. The following minor change in text will correct an error in the stated Bases for the PSL1 Thermal Margin/Low Pressure (TM/LP) trip setpoints.

On Page B 2-7, under Thermal Margin/Low Pressure: Delete "of 30 psia" from the second sentence of paragraph 3.

The bases presently state that an allowance of 30 psia is included in the TM/LP trip setpoint to compensate for the time delay associated with effective termination of the event that exhibits the most rapid decrease in margin to the DNBR limit. This pressure bias has been superseded and is incorrect, e.g., a value of 42 psia was established for this allowance as part of the core reload safety analyses for PSL1 Cycle 11.

Simply deleting the specific numerical value from the text will both rectify the existing error and preclude the need for an amendment to the Bases section each time this parameter is adjusted. Concurrently, the syntax of this sentence will be more consistent with the context of the third paragraph in that only the types of setpoint allowances are identified.

END OF PROPOSED TS CHANGES FOR PSL1

2. PSL2 Proposed TS Changes and Justifications

a. The following changes in text will improve consistency within the PSL2 TS by revising and/or deleting outdated material, providing proper references, and correcting spelling and/or nomenclature errors.

(1) On Page V: Under 3/4.3 INSTRUMENTATION, delete "FIRE DETECTION INSTRUMENTATION ... 3/4 3-44." This TS was deleted by Amendment 55.

(2) On Page VIII:

a) Delete the entire section "3/4.7.11 FIRE SUPPRESSION SYSTEMS" and the referenced pages.

b) Delete "3/4.7.12 FIRE RATED ASSEMBLIES ... 3/4 7-39."

The specifications were deleted by Amendment 55.

(3) On Page X:

a) Delete "3/4.11 RADIOACTIVE EFFLUENTS"

b) Delete "3/4.12 GASEOUS EFFLUENTS"

c) Add the appropriate SECTION number "3/4.11.2.5" preceding EXPLOSIVE GAS MIXTURE, and "3/4.11.2.6" preceding GAS STORAGE TANKS.

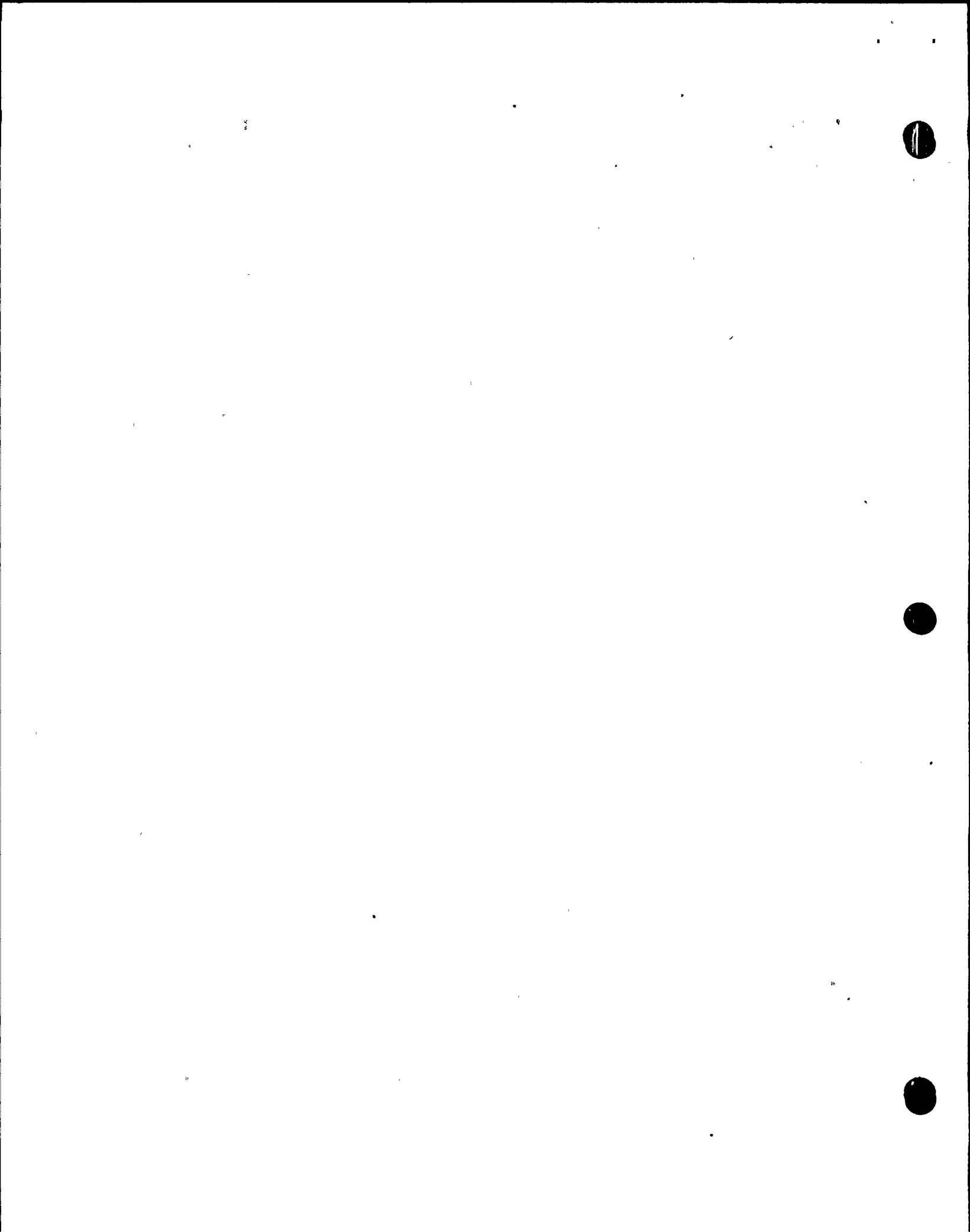
The revisions will make the Index consistent with TS changes implemented pursuant to Amendment 61.

(4) On Page XIV:

a) Delete "3/4.7.11 FIRE SUPPRESSION SYSTEMS...B 3/4 7-7"

b) Delete "3/4.7.12 FIRE RATED ASSEMBLIES...B 3/4 7-8"

The Bases sections were deleted pursuant to Amendment 55.



(5) On Page XVI:

- a) Under 3/4.11 RADIOACTIVE EFFLUENTS
- i) Delete "3/4.11.1 LIQUID EFFLUENTS...B 3/4 11-1."
 - ii) Replace "3/4.11.2 GASEOUS EFFLUENTS...B 3/4 11-2" with "3/4.11.2.5 EXPLOSIVE GAS MIXTURE ... B 3/4 11-4."
 - iii) Replace "3/4.11.3 SOLID RADIOACTIVE WASTE" with "3/4.11.2.6 GAS STORAGE TANKS."
 - iv) Delete "3/4.11.4 TOTAL DOSE ... B 3/4 11-5."
- b) Delete the entire section "3/4.12 RADIOACTIVE ENVIRONMENTAL MONITORING" and the referenced pages.

The Bases sections were changed pursuant to Amendment 61.

(6) On Pages XVIII and XXI: Revise the page references as shown in Attachment 4 to this submittal. The topics do not appear on the pages presently indicated.

(7) On Page XXIII:

- a) For TABLE 3.3-2, replace "REACTOR PROTECTIVE INSTRUMENTATION RESPONSE TIMES ... 3/4 3-6" with the word "DELETED"
- b) For TABLE 3.3-5, replace "ENGINEERED SAFETY FEATURES RESPONSE TIMES ... 3/4 3-19" with the word "DELETED"

The tables were removed from the TS per Amendment 67.

(8) On Page XXIV:

- a) For TABLE 3.3-11, replace "FIRE DETECTION INSTRUMENTS ... 3/4 3-45" with the word "DELETED." This table was deleted by Amendment 55.
- b) For TABLE 3.3-12, replace "RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION ... 3/4 3-49" with the word "DELETED." This table was deleted by Amendment 61.

- c) For TABLE 4.3-8, replace "RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION...3/4 3-51" with the word "DELETED." This table was deleted by Amendment 61.
- d) For TABLE 3.3-13, replace "RADIOACTIVE GASEOUS EFFLUENT" with the words "EXPLOSIVE GAS." This table was revised by Amendment 61.
- e) For TABLE 4.3-9, replace "RADIOACTIVE GASEOUS EFFLUENT" with the words "EXPLOSIVE GAS," and revise the reference page "3/4 3-57" to read "3/4 3-55." The table content was revised by Amendment 61, and the reference page for TABLE 4.3-9 will change as proposed in section b.(2) below.

(9) On Page XXV:

- a) For TABLE 3.7-4, replace "FIRE HOSE STATIONS ... 3/4 7-36" with the word "DELETED." This table was deleted by Amendment 55.
- b) For TABLE 3.7-5, replace "YARD FIRE HYDRANTS AND ASSOCIATED HYDRANT HOSE HOUSES ... 3/4 7-38" with the word "DELETED." This table was deleted by Amendment 55.
- c) For each of the following tables, replace the title and associated reference page with the word "DELETED." The tables were deleted from the TS by Amendment 61.
 - i) TABLE 4.11-1, "RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM...3/4 11-2"
 - ii) TABLE 4.11-2, "RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM...3/4 11-8"
 - iii) TABLE 3.12-1, "RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM...3/4 12-3"
 - iv) TABLE 3.12-2, "REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES...3/4 12-7"
 - v) TABLE 4.12-1, "DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS...3/4 12-8"



- (10) On Page 3/4 3-30, Surveillance Requirement 4.3.3.2.a.2: Revise the reference Specification "4.2.1.3" to read, "4.2.1.4."

The proposed change rectifies an improper reference. TS 4.2.1.4 is the proper reference for the incore monitoring system.

- (11) On Page 3/4 3-43, TABLE 4.3-7: Renumber the Containment Sump Water Level (Narrow Range) instrument as item "15." The table lists item 16 twice.

b. The following reorganization of text will restore coherency to the tabular format of TS 3/4.3.3.10.

- (1) On Page 3/4 3-54, TABLE 3.3-13: As shown in Attachment 4 to this submittal, incorporate all of the TABLE NOTATION text that is currently printed on Page 3/4 3-56 (Amendment 61).

TABLE 3.3-13 was fragmented as a result of deletions made pursuant to Amendment 61. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format.

- (2) On Page 3/4 3-55: Delete the word "DELETED". On this page as shown in Attachment 4 to this submittal, incorporate all of the TABLE 4.3-9 text that is currently printed on page 3/4 3-57 (Amendment 61), and all of the associated TABLE NOTATION text that is currently printed on Page 3/4 3-59 (Amendment 61).

TABLE 4.3-9 was fragmented as a result of deletions made pursuant to Amendment 61. The proposed change is a simple relocation of existing text in order to combine these fragments on a single page and thereby restore the consistency of the TS format. Printing TABLE 4.3-9 in its entirety on page 3/4 3-55 will facilitate deletion of blank pages as described in item 2.d.(3) below.

c. The following changes in text will provide accountability for the applicable pages listed in section 2.d that FPL has selected for deletion from the technical specifications.

- (1) On Page 3/4 3-44: Replace the word "DELETED" with the text, "Pages 3/4 3-45 through 3/4 3-46 (Amendment 55) have been deleted from the Technical Specifications."
- (2) On Page 3/4 3-48: Replace the word "DELETED" with the text, "Pages 3/4 3-49 through 3/4 3-52 (Amendment 61) have been deleted from the Technical Specifications."
- (3) On Page 3/4 3-56: Delete the existing text, and add the statement, "Pages 3/4 3-57 through 3/4 3-59 (Amendment 61) have been deleted from the Technical Specifications." (The text presently printed on page 3/4 3-56 will be relocated to page 3/4 3-54 per 2.b.(1) above).
- (4) On Page 3/4 11-1: Replace the word "DELETED" with the text, "Pages 3/4 11-2 through 3/4 11-13 (Amendment 61) have been deleted from the Technical Specifications."
- (5) On Page B 3/4 11-1: Add the text, "Pages B 3/4 11-2 through B 3/4 11-3 (Amendment 61) have been deleted from the Technical Specifications."

The text proposed in each of the above items will preserve the continuity of pagination. The pages that are referred to in the text will be removed from the TS.

d. FPL proposes to delete the following pages from the PSL2 Technical Specifications.

- (1) Delete pages 3/4 3-45 through 3/4 3-46 (Amendment 55).
- (2) Delete pages 3/4 3-49 through 3/4 3-52 (Amendment 61).
- (3) **Delete pages 3/4 3-57 through 3/4 3-59 (Amendment 61).
- (4) Delete pages 3/4 11-2 through 3/4 11-13 (Amendment 61).



- (5) *Delete pages 3/4 11-16 through 3/4 11-17 (Amendment 61).
- (6) *Delete pages 3/4 12-1 through 3/4 12-12 (Amendment 61).
- (7) *Delete page B 3/4 2-3 (Amendment 8).
- (8) Delete pages B 3/4 11-2 through B 3/4 11-3 (Amendment 61).
- (9) *Delete pages B 3/4 12-1 through B 3/4 12-2 (Amendment 61).
- (10) *Delete page 6-24 (Amendment 61).

Except as noted by *, continuity of pagination will be preserved by a note on the page immediately preceding each page group as proposed in section 2.c above.

* Pages denoted by a single asterisk are the last pages in the applicable TS section, and deletion of these pages will not interrupt the page numbering sequence.

** The existing text on Pages 3/4 3-57 and 3/4 3-59 will appear on page 3/4 3-55 per item 2.b.(2) above.

- e. The following changes in text will rectify errors in nomenclature relevant to the Auxiliary Feedwater Actuation System (AFAS); will correct errors of omission involving multiple functional units of the Reactor Protection System (RPS) and the Engineered Safeguards Actuation System (ESFAS) that would be affected by an inoperable process measurement circuit; and will improve consistency in PSL2 TS format.

- (1) On Page 3/4 3-4, TABLE 3.3-1, ACTION 2:
 - a) For Process Measurement Circuit 2, "Pressurizer Pressure - High:"
 - i) Delete the modifier " - High" from the process measurement circuit description.



The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

- ii) Add the functional unit "Pressurizer Pressure-Low (ESF)" to the Functional Unit Bypassed column.

The pressurizer pressure process measurement circuit provides data to both the RPS and the Safety Injection Actuation Signal (SIAS) of the ESFAS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 2. In addition, cross-referencing the two systems (RPS, ESF) for this parameter is consistent with the format of corresponding Table 3.3-3 for the ESFAS.

- b) For Process Measurement Circuit 3, "Containment Pressure - High," delete the modifier " - High" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

- c) For Process Measurement Circuit 4, "Steam Generator Pressure - Low:"

- i) Delete the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.



- ii) Delete functional unit "Steam Generator Δ P 1 and 2 (AFAS 1 and 2)" from the Functional Unit Bypassed column, and add functional unit "AFAS-1 and AFAS-2 (AFAS)."

The Steam Generator Δ P function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for PSL2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the PSL2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 2.

- iii) Add functional unit "Steam Generator Pressure-Low (ESF)" to the Functional Unit Bypassed column.

The steam generator pressure process measurement circuit provides data to both the RPS and the Main Steam Isolation Signal (MSIS) of the ESFAS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 2. In addition, cross-referencing the two systems (RPS, ESF) for this parameter is consistent with the format of corresponding Table 3.3-3 for the ESFAS.

- d) For Process Measurement Circuit 5, "Steam Generator Level:"
- i) Delete functional unit "Steam Generator Δ P (AFAS)" from the Functional Unit Bypassed column, and
- ii) Add functional unit "If SG-2A, then AFAS-1 (AFAS)", and
- iii) Add functional unit "If SG-2B, then AFAS-2 (AFAS)."

The Steam Generator Δ P function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system

designed for PSL2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the PSL2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 2.

The steam generator (SG) level process measurement circuits do not have cross-train functions within the AFAS. Thus, if the level measurement circuit for SG-2A is inoperable, only the corresponding AFAS-1 would be affected. Likewise, if the level measurement circuit for SG-2B is inoperable, only AFAS-2 would be affected. The proposed wording clarifies the required action and is consistent with the PSL2-AFAS configuration.

(2) On Page 3/4 3-15, TABLE 3.3-3, ACTION 13:

- a) For Process Measurement Circuit 1, "Containment Pressure - High," delete the modifier " - High" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

- b) For Process Measurement Circuit 2, "Steam Generator Pressure - Low:"

- i) Delete the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

- ii) Delete functional unit "Steam Generator Δ P 1 and 2 (AFAS)" from the Functional Unit Bypassed column, and add functional unit "AFAS-1 and AFAS-2 (AFAS)."

The Steam Generator Δ P function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for PSL2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the PSL2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 13.

- iii) Add functional unit "Steam Generator Pressure-Low (RPS)" to the Functional Unit Bypassed column.

The steam generator pressure process measurement circuit provides data to both the Main Steam Isolation Signal (MSIS) of the ESFAS, and the RPS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 13. In addition, cross-referencing the two systems (ESF, RPS) for this parameter is consistent with the format of corresponding Table 3.3-1 for the RPS.

- c) For Process Measurement Circuit 3, "Steam Generator Level:"
- i) Delete "Steam Generator Level-Low (AFAS, RPS)" from the Functional Unit Bypassed column, and
 - ii) Add "Steam Generator Level-Low (RPS)", and
 - iii) Add "If SG-2A, then AFAS-1 (AFAS)", and
 - iv) Add "If SG-2B, then AFAS-2 (AFAS)."

The steam generator (SG) level process measurement circuits do not have cross-train functions within the AFAS. Thus, if the level measurement circuit for SG-2A is inoperable, only the corresponding

AFAS-1 would be affected. Likewise, if the level measurement circuit for SG-2B is inoperable, only AFAS-2 would be affected. The proposed wording clarifies the required action and is consistent with the PSL2-AFAS configuration.

(3) On Page 3/4 3-16, TABLE 3.3-3, ACTION 14:

- a) For Process Measurement Circuit 1, "Containment Pressure Circuit," delete the word "Circuit" from the description. The word is redundant, and is not consistent with the format of Table 3.3-1 (ACTION 2) or Table 3.3-3 (ACTION 13).
- b) For Process Measurement Circuit 2, "Steam Generator Pressure - Low:"
 - i) Delete the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units.

- ii) Delete functional unit "Steam Generator Δ P 1 and 2 (AFAS)" from the Functional Unit Bypassed column, and add functional unit "AFAS-1 and AFAS-2 (AFAS)."

The Steam Generator Δ P function is included in the AFAS to identify a faulted steam generator, but has no specific manual bypass feature in the system designed for PSL2. The proposed terminology is the proper nomenclature for the functional unit to be bypassed in the PSL2 AFAS, and is in agreement with the labelling on the bypass (pushbutton) switches. FPL has obtained concurrence from the vendor that the proposed change would be appropriate for the purpose of minimizing potential operator confusion when implementing ACTION 14.



- iii) Add functional unit "Steam Generator Pressure-Low (RPS)" to the Functional Unit Bypassed column.

The steam generator pressure process measurement circuit provides data to both the Main Steam Isolation Signal (MSIS) of the ESFAS, and the RPS. Omission of this functional unit from the list provides a potential for operator error when implementing ACTION 14. In addition, cross-referencing the two systems (ESF, RPS) for this parameter is consistent with the format of corresponding Table 3.3-1 for the RPS.

- c) For Process Measurement Circuit 3, "Steam Generator Level - Low:"

- i) Delete the modifier " - Low" from the process measurement circuit description.

The modifier is misleading in this context since measurement is not restricted to one direction, and inoperability of the process measurement circuit either high or low would affect the associated functional units. In addition, the description will be consistent with the same circuit listed in TABLE 3.3-3, ACTION 13.

- ii) Delete "Steam Generator Level-Low (RPS) (AFAS)" from the Functional Unit Bypassed column, and
iii) Add "Steam Generator Level-Low (RPS)", and
iv) Add "If SG-2A, then AFAS-1 (AFAS)", and
v) Add "If SG-2B, then AFAS-2 (AFAS)."

The steam generator (SG) level process measurement circuits do not have cross-train functions within the AFAS. Thus, if the level measurement circuit for SG-2A is inoperable, only the corresponding AFAS-1 would be affected. Likewise, if the level measurement circuit for SG-2B is inoperable, only AFAS-2 would be affected. The proposed wording clarifies the required action, and is consistent with the PSL2-AFAS configuration and the proposed wording for TABLE 3.3-3, ACTION 13.

- f. The following change in text will correct an error in the action statement for an inoperable process monitor in the PSL2 Fuel Handling Building Ventilation System (FHBVS), and will achieve consistency between the corresponding TS for PSL1 and PSL2.

On Page 3/4 3-27, TABLE 3.3-6, under ACTION STATEMENTS: revise ACTION 24 by replacing, "comply with the ACTION requirements of Specification 3.6.6.1," with the proper requirement, "suspend all operations involving movement of fuel within the spent fuel storage pool and crane operations with loads over the spent fuel storage pool."

Background: TS 3.3.3.1 requires the Gaseous Activity and the Particulate Activity Process Monitors for the Fuel Storage Pool Area Ventilation System (part of the FHBVS) to be OPERABLE "with irradiated fuel in the storage pool or whenever there is fuel movement within the pool or crane operation with loads over the storage pool." These monitors sample the air stream, which includes the normal exhaust from the storage pool area, as it exits the Fuel Handling Building (FHB) via the FHB vent. If either of the process monitors is inoperable, ACTION 24 of TABLE 3.3-6 must be implemented.

ACTION 24 presently directs the operator to comply with the action requirements of TS 3.6.6.1, which apply to the Shield Building Ventilation System (SBVS). During operational MODES 1, 2, 3, and 4, the stated ACTION is, "With one SBVS inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours." For MODES 5 and 6 the stated ACTION is, "With one SBVS inoperable, restore the inoperable system to OPERABLE status within the next 7 days or suspend fuel movement within the spent fuel storage pool and crane operations over the spent fuel storage pool."

The SBVS is designed to collect and filter radioactive airborne fission products that may leak from the primary containment to the shield building annulus following the postulated LOCA. The system design also includes provisions

for exhaust filtration in the event of a fuel handling accident in the reactor containment or the FHB. The SBVS exhausts to the Plant Vent, and is typically isolated from the FHBVS during normal plant operation.

Should a fuel handling accident occur in the FHB, the fuel storage pool area "criticality and ventilation system isolation monitor," which is composed of safety-related Area Radiation Monitors, will alarm and automatically isolate the FHB, shut off the FHBVS, and start the SBVS. The contaminated air will then be processed through the SBVS prior to being discharged to the environment. The FHBVS Process Monitors are not related to this series of automatic functions.

Justification: The subject reference to TS 3.6.6.1 is an error that has no pertinent design or safety related basis, and provides the potential for inappropriate operator actions in response to an inoperable process monitor. The FHBVS Process Monitors do not sample the SBVS air stream, are not part of the SBVS actuation logic that is designed to mitigate a fuel handling accident, and the operating status of these monitors is not otherwise related to SBVS operability. Moreover, the action statements of TS 3.6.6.1 are mode dependent, and the action specified for Modes 1-4 considers SBVS equipment availability for LOCA mitigation. Accident mitigation is not a function of the subject process monitors.

The operability requirements for the FHBVS Process Monitors are mode independent and related only to normal storage pool activities with irradiated fuel in the pool. The revised action statement will properly require such fuel pool activities to be suspended in the event that even one of the monitors becomes inoperable during any mode of plant operation. The proposed change in text will make ACTION 24 consistent with NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors," which was used for guidance during development of the PSL2 TS; and, in addition, is in agreement with the corresponding TS for St. Lucie Unit 1.

- g. The following minor change in text will correct an error of contradiction stated in the bases for the Emergency Core Cooling Systems (ECCS) found in PSL2 Bases Section 3/4.5.

On Page B 3/4 5-2, under the heading "ECCS SUBSYSTEMS (Continued):" Revise the first sentence by replacing the phrase "With the RCS temperature below 325 °F" with, "In MODE 3 with RCS pressure less than 1750 psia and in MODE 4."

Limiting Condition for Operation (LCO) 3.5.3 requires at least one Emergency Core Cooling System (ECCS) subsystem to be OPERABLE in MODE 3 with pressurizer pressure less than 1750 psia, and in MODE 4. One operable ECCS subsystem is acceptable for these plant conditions without single failure consideration, based on the stable reactivity condition of the reactor and the limited core cooling requirements.

The present wording of the subject bases section implies, erroneously, that one subsystem is acceptable only when RCS temperature is below 325 °F. This is a contradiction since, by definition, the average RCS temperature for MODE 3 conditions is ≥ 325 °F. The proposed wording will rectify the error and more accurately reflect the bases for LCO 3.5.3.

3. Conclusion

The proposed changes will update the index and remove blank pages; and will implement minor changes in text to rectify reference, nomenclature, omission, spelling, and/or consistency-in-format errors. Changes in wording proposed for the Bases Sections simply rectify errors in stated parameters and/or errors of contradiction in order to more accurately reflect the actual bases for the associated LCOs. The changes are administrative in nature and will improve consistency within the TS for each unit.



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

ATTACHMENT 2

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION



DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Pursuant to 10CFR50.92, 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 consist of administrative changes to the Technical Specifications (TS) for St. Lucie Units 1 and 2. The amendments will update the index and remove blank pages; implement minor changes in text to rectify reference, nomenclature, spelling, and/or consistency-in-format errors; and otherwise improve consistency within the TS for each unit. The proposed amendments do not involve changes to the configuration or method of operation of plant equipment that is used to mitigate the consequences of an accident, nor do the changes otherwise affect the initial conditions or conservatisms assumed in any of the plant accident analyses. Therefore, operation of the facility in accordance with the proposed amendments 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 administrative revisions will not change the physical plant or the modes of plant operation defined in the Facility License for each unit. 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 the facility in accordance with the proposed amendments 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 amendments are administrative in nature and do not change the basis for any technical specification that is related to the establishment of, or the preservation of, a nuclear safety margin. Therefore, operation of the facility in accordance with the proposed amendments 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 amendment involves no significant hazards consideration.