

## **NRR-DMPSPEm Resource**

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**From:** Buckberg, Perry  
**Sent:** Thursday, February 01, 2018 2:51 PM  
**To:** Frehafer, Ken  
**Cc:** Kilby, Gary; Snyder, Mike; Mack, Jarrett (Jarrett.Mack@fpl.com)  
**Subject:** Request for Additional Information - St. Lucie RICT LAR I&C - (CACs MF5372/MF5373 EPID L-2014-LLA-0001)  
**Attachments:** St Lucie EICB RAI RICT January 2018.pdf

Ken,

By letter dated December 5, 2014, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14353A016), as supplemented by letters dated July 8, 2016, July 22, 2016 and February 25, 2017, Florida Power & Light (FPL), submitted a license amendment request (LAR) for St. Lucie Units 1 and 2. The LAR proposes changes to the Technical Specifications (TSs) for Units 1 and 2 that would permit the use of a Risk Informed Completion Time (RICT) for several TSs. The NRC staff finds that additional information is needed to complete our review of the proposed amendment.

The NRC staff's Final Request for Additional Information (RAI) related to I&C (EICB) is attached. A draft copy of this RAI was provided to you in January 16, 2018, and based on a clarification call held on January 29, 2018, an example diversity table was added to the RAI.

Consistent with our communications earlier today, the NRC requests that the responses to the attached final RAIs be issued within 45 days of this email.

Thanks,

**Perry Buckberg**

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**From:** Buckberg, Perry

**Created By:** Perry.Buckberg@nrc.gov

**Recipients:**

"Kilby, Gary" <Gary.Kilby@fpl.com>  
Tracking Status: None  
"Snyder, Mike" <Mike.Snyder@fpl.com>  
Tracking Status: None  
"Mack, Jarrett (Jarrett.Mack@fpl.com)" <Jarrett.Mack@fpl.com>  
Tracking Status: None  
"Frehafer, Ken" <Ken.Frehafer@fpl.com>  
Tracking Status: None

**Post Office:**

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St Lucie EICB RAI RICT January 2018.pdf		90049

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
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**REQUEST FOR ADDITIONAL INFORMATION**  
**ST LUCIE NUCLEAR PLANT, UNITS 1 AND 2**  
**DOCKET NOS. 50-335 AND 50-389**  
**LICENSE AMENDMENT REQUEST TO PERMIT THE USE OF**  
**RISK INFORMED COMPLETION TIMES**  
**CACs MF5372 & MF5373 - EPID L-2014-LLA-0001**

By letter dated December 5, 2014, as supplemented by letters dated July 8, 2016, July 22, 2016 and February 25, 2017, Florida Power and Light Company (FPL, the licensee) submitted a license amendment request (LAR) which proposed changes to the Technical Specifications (TSs) for the St. Lucie Nuclear Plant, Units 1 and 2. Specifically, the requested changes would permit the use of a Risk Informed Completion Time (RICT) for several Technical Specifications. The NRC staff finds that additional information is needed to complete our review of the proposed amendment.

**RAI-MF5372/73-EICB-08**

The LAR is a risk-informed request to modify St Lucie, Units 1 and 2 Technical Specification. Regulatory guidance on risk-informed changes to a licensing basis is provided in Regulatory Guide (RG) 1.174, Revision 2, "An Approach for Using Probabilistic Risk Assessment in Risk Informed Decisions on Plant Specific Changes to the Licensing Basis," May 2011 (ADAMS Accession No. ML100910006), and regulatory guidance on risk-informed changes to technical specifications is provided in Revision 1 of RG 1.177, "An Approach for Plant Specific, Risk Informed Decisionmaking: Technical Specifications," May 2011 (ADAMS Accession No. ML100910008). Both RGs describes an acceptable risk-informed approach for assessing the nature and impact of proposed permanent licensing basis changes by considering engineering issues and applying risk insights. Additionally, both RGs describe the regulatory positions and requirements with respect to the traditional engineering considerations of the defense-in-depth attributes.

The NRC staff is requesting additional information to determine the consistency with defense-in-depth of the proposed changes to TS Section 3/4.3, "Instrumentation," to ensure redundancy and diversity are maintained.

Please verify that there is at least one diverse means to mitigate each condition/accident for which each identified I&C function defined in TS 3/4.3 is designed to prevent. For example, provide a summary table of the diverse means that exist to initiate the safety function for each plant accident condition that each TS 3/4.3 function is currently designed to address.

## Diversity Example Table

FUNCTION	Safety Function	Plant Condition / Accident	Diverse Means
Steam Line flow - high Coincident with Steam Generator Pressure - low	Safety Injection	Steamline Break Inside Containment	1. Automatic SI: a. Pressurizer pressure (low) b. Containment pressure (high) c. Steamline pressure (low in one loop) d. Steamline flow (high) in two steamlines coincident with Tavg (low-low) e. Differential pressure between steamlines (high) 2. Manual Initiation
		Steamline Break Outside Containment	a. Pressurizer pressure (low) b. Steamline pressure (low in one loop) c. Differential pressure between steamlines (high) d. Steamline flow (high) in two steamlines coincident with Tavg (low-low)
	Steamline isolation	Steamline Break Inside Containment	a. Containment pressure (high-2) b. Steamline pressure (low) c. Steamline pressure (negative rate) d. Steamline flow (high) in two steamlines coincident with Tavg (low-low)