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10 CFR 50.55a

U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Subject: St. Lucie Unit 1
Docket No. 50-335
Renewed Operating License DPR-67
Snubber Program Plan Submittal

Pursuant to 10 CFR 50.55a (g)(4), Florida Power & Light Company (FPL) is updating its snubber program for the fifth 10-year inservice testing interval at the St Lucie Nuclear Plant, Unit 1 (PSL-1). The Code Edition and Addenda applicable to PSL-1 for the fifth inservice testing interval is the ASME OM Code 2004 Edition through 2006 Addenda. Paragraph 50.55a (b)(3)(v) requires ASME OM Code, Subsection ISTD, Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants, to be used for examination and testing of snubbers. The fifth 10-year interval for snubbers begins February 11, 2018.

Attachment 1 provides the PSL-1 Snubber Program Plan for the Fifth Ten Year Interval. FPL is providing this plan for information only in accordance with the requirement of the ASME OM Code, ISTA-3200 and is not requesting NRC approval of this plan. This plan does not include any new commitments.

If you should have any questions, please contact Mr. Ken Frehafer at (772) 467-7748.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael J. Snyder', is written over a light blue horizontal line.

Michael J. Snyder
Licensing Manager
St. Lucie Plant

Attachments:

1. St. Lucie Unit 1 Snubber Testing Program Plan Fifth 10-Year Interval

Attachment
MJS/KWF

cc: USNRC Regional Administrator, Region II
USNRC Senior Resident Inspector, St. Lucie Units 1 and 2

St. Lucie Plant Unit 1

Snubber Testing Program Plan Fifth 10-Year Interval Beginning February 11, 2018 Ending February 10, 2028

USNRC DOCKET NO. 50-335
RENEWED OPERATING LICENSE NO. DPR-67

Revision 0

**Florida Power & Light Company
St. Lucie Plant
6501 S. Ocean Drive
Jensen Beach, FL 34957**

Revision Log

Effective Date	Revision Description	Prepared: IST Snubber Coordinator	Date	Approved: Engineering Manager	Date
2/11/2018	Updated Snubber Program Plan for fifth 10-year interval	See EC 290451 Milestone 140		See EC 290451 Milestone 140	

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1.0 INTRODUCTION:

1.1 Purpose:

To provide the test plan for maintaining the operational readiness of those safety and quality related dynamic restraints (Snubbers) whose specific functions are required to ensure the integrity of the reactor coolant pressure boundary or any safety-related system as specified below.

1.2 Scope:

The program meets the requirements of the following subsections of the American Society of Mechanical Engineers (ASME) OM Code 2004 Edition with 2005 and 2006 Addenda.

- Subsection ISTA, “*General Requirements*”

ISTA contains the requirements directly applicable to inservice examination and testing including the Owner’s Responsibility and Records Requirements.

- Subsection ISTD, “*Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants*”

ISTD establishes requirements for preservice and inservice examination and testing, and the service life monitoring of Dynamic Restraints (*Snubbers*) in light-water reactor nuclear power plants.

The snubbers included are those classified as ASME Code Class 1, 2 or 3 and those required to support the systems and components that are required in shutting down a reactor to the safe shutdown condition, in maintaining the safe shutdown condition, or in mitigating the consequences of an accident, or to ensure the integrity of the reactor coolant pressure boundary.

1.3 Discussion:

In order to ensure the required operability of all safety related and quality related snubbers for the St. Lucie Plant during seismic or other events that may initiate dynamic loads, the examination, testing and service life monitoring of these snubbers shall be implemented and performed in accordance with the requirements of the station Snubber Testing Program Requirements.

The examination boundaries for the Snubber Program shall include the snubber assembly from pin to pin inclusive. Integral and nonintegral structural attachments for snubbers, when examined, shall be examined in accordance with the requirements of the ASME Code Section XI, Article IWF-2500(a), (b), (c) and (d), in accordance with the ISI program requirements.

The Snubber Program described in OSP-73.01 and ER-AA-119 adheres to the requirements of the ASME OM Code, Subsection ISTD, 2004 Edition with 2005 and 2006 Addenda, as required by 10CFR50.55a(b)(3)(v)(B).

2.0 EXAMINATION, TESTING AND SERVICE LIFE MONITORING REQUIREMENTS:

- 2.1 Visual Examinations, Functional Testing, and Service Life requirements shall be performed to the extent specified within OSP-73.01, and ER-AA-119 and referenced Surveillance Test Procedures.
- 2.2 Snubbers are grouped into Defined Test Plan Groups (DTPGs) in accordance with ISTD-5252. Each DTPG will be tested using the 10% sample plan per ISTD-5300. Large equipment snubbers attached to the Steam Generators or Reactor Coolant Pumps will each comprise separate DTPG's.
- 2.3 The service life of all snubbers shall be monitored and snubbers evaluated, replaced, or reconditioned in accordance with OSP-73.01, ER-AA-119 and ISTD-6200 to ensure that the service life is not exceeded between surveillance inspections. The replacement or reconditioning of snubbers shall be documented and records retained in accordance with St. Lucie Plant procedures.

3.0 EXAMINATION and TESTING METHODS:

- 3.1 Visual examinations shall be performed by individuals qualified in accordance with St. Lucie Plant or vendor procedures. These examinations are conducted to ensure the mechanical and structural condition of the snubber support location and to observe conditions that could affect functional adequacy. Visual examinations and functional testing shall be performed to verify the requirements specified within OSP-73.01 and ER-AA-119 are met in accordance with Subsection ISTD.

4.0 EXAMINATION and TESTING FREQUENCY:

- 4.1 Visual Examinations and Functional Testing shall be performed at the frequency specified within OSP-73.01, ER-AA-119 and ISTD-4250 and ISTD-5240. Snubbers are categorized as inaccessible or accessible during reactor operation for visual examination and may be examined independently according to the schedule determined by Table ISTD 4252-1.
- 4.2 Code Case OMN-13, which allows the extension of the visual examination interval, has been implemented for snubber inspections scheduled during this interval. Code Case OMN-13 is approved for use in Regulatory Guide 1.192 (June 2003).
- 4.3 Post installation visual Examinations shall be performed whenever new snubbers are installed, reinstallation of existing or swapped snubbers that were functionally tested, or after repairs, replacements or modifications.
- 4.4 Functional testing requirements for new installations or spares shall be equal to or more stringent than that specified within OSP-73.01 and ER-AA-119.

5.0 EXAMINATION, TESTING AND SERVICE LIFE MONITORING EVALUATION:

- 5.1 Snubbers that do not appear to conform to the Visual Examination requirements of OSP-73.01 and ER-AA-119, shall be reported for evaluation and appropriate corrective action.
- 5.2 Snubbers that do not appear to conform to the visual examination acceptance requirements and are later confirmed as operable as a result of functional testing may be declared operable for the purpose of establishing the next visual inspection interval, providing that the unacceptable condition did not affect operational readiness for the snubber location.
- 5.3 Snubbers that do not meet the functional testing acceptance criteria in OSP-73.01 and ER-AA-119 shall be evaluated to determine the cause of the failure and appropriate corrective action shall be taken.
- 5.4 The service life of a snubber will be evaluated once each fuel cycle using manufacturer's input and contemporary information gained through consideration of the snubber service conditions and inservice functional test results. Service life monitoring program requirements are included in OSP-73.01 and ER-AA-119.

6.0 REPAIR, REPLACEMENT, AND MODIFICATION REQUIREMENTS:

- 6.1 Repairs, Replacements and Modifications performed on snubbers under this program shall conform, as applicable, to the requirements specified within the ASME Code, Section XI 2007 Edition through 2008 Addenda.

7.0 SCHEDULING:

- 7.1 Schedules for snubber Visual Examinations, Functional Testing, and Service Life Replacements will be established, tracked and maintained in accordance with OSP-73.01, ER-AA-119 and Subsection ISTD by the Snubber Engineer.
- 7.2 A controlled listing of snubbers included in this program is maintained and is controlled within the NAMS Equipment Data Base.
- 7.3 The Snubber Engineer shall identify and track expanded or additional testing and/or examinations as required by OSP-73.01, ER-AA-119 and Subsection ISTD.

8.0 REPORTS and RECORDS:

- 8.1 Reports and records for the Visual Examinations and Functional Testing shall be maintained for all snubbers included within the Snubber Program in accordance with QI-17-PSL-1, Quality Assurance Records.
- 8.2 Applicable records and reports, as required for Repair and Replacements, shall be maintained.
- 8.3 Records of the service life of all snubbers listed in this program, including the date at which the service life commences or expires, and associated installation and maintenance records shall also be maintained in accordance with QI-17-PSL-1 and ER-AA-119.