NRC FORM 195 (2-70)

U.S. NUCLEAR REGULATORY COMMISSION

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

DOCKET NUMBER: 50-335

FILE NUMBER:

TO: MR V STELLO

FROM: FLORIDA POWER & LIGHT CO
MIAMI, FLA
R E UHRIG

DATE OF DOCUMENT: 8-16-76

DATE RECEIVED: 8-19-76

X LETTER
X ORIGINAL
☐ COPY

X NOTORIZED
X UNCLASSIFIED

PROP

INPUT FORM

NUMBER OF COPIES RECEIVED: 3 SIGN 40 C.C.

DESCRIPTION

LTR NOTORIZED 8-16-76 TRANS THE FOLLOWING.....

ENCLOSURE

PROPOSED AMDT TO FACILITY OPERATING LICENSE CONCERNING THE AUTOMATIC ACTUATION OF A CONTAINMENT VACUUM RELIEF VALVE DUE TO VACUUM IN CONTAINMENT.....

ACKNOWLEDGED
DO NOT REMOVE

PLANT NAME: ST. LUCIE #1

FOR ACTION/INFORMATION

ENVIRO 8-19-76 RKB

SAFETY		ENVIRO
ASSIGNED AD:		ASSIGNED AD:
✓ BRANCH CHIEF: (6)	Ziemann	BRANCH CHIEF:
✓ PROJECT MANAGER: (1)	Silver	PROJECT MANAGER:
✓ LIC. ASST.: (17)	Diggs	LIC. ASST.:

INTERNAL DISTRIBUTION

✓ REG FILE	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
✓ NRC PDR	HEINEMAN	TEDESCO	ENVIRO ANALYSIS
✓ I & E (2)	SCHROEDER	BENAROYA	DENTON & MULLER
✓ OELD		LAINAS	
GOSSICK & STAFF	ENGINEERING	IPPOLITO	ENVIRO TECH.
MIPC	MACCARRY	KIRKWOOD	ERNST
CASE	KNIGHT		BALLARD
HANAUER	SIHWEIL	OPERATING REACTORS	SPANGLER
HARLESS	PAWLICKI	STELLO	
			SITE TECH.
PROJECT MANAGEMENT	REACTOR SAFETY	OPERATING TECH.	GAMMILL
BOYD	ROSS	✓ EISENHUT	STEPP
P. COLLINS	NOVAK	✓ SHAO	HULMAN
HOUSTON	ROSZTOCZY	✓ BAER	
PETERSON	CHECK	✓ BUTLER	SITE ANALYSIS
MELTZ		✓ GRIMES	VOLLMER
HELTEMES	AT & I		BUNCH
SKOVHOLT	SALTZMAN		✓ J. COLLINS
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION

✓ LPDR: FT. PIERCE, FLA.	NAT LAB:	BROOKHAVEN NAT LAB	CONTROL NUMBER
✓ TIC:	REG. VIE	ULRIKSON (ORNL)	8450
✓ NSIC:	LA PDR		
ASLB:	CONSULTANTS		
ACRS CYS/6 HOLDING/SENT To L.A. Diggs			

NRC FORM 195 (2-76)

DO NOT REMOVE
ACKNOWLEDGED

Regulatory File Cy

P.O. BOX 013100, MIAMI, FL 33101

FPL
FLORIDA POWER & LIGHT COMPANY

August 16, 1976
L-76-296

Director of Nuclear Reactor Regulation
Attention: Mr. Victor Stello, Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Stello:

Re: St. Lucie Unit 1
Docket No. 50-335
Proposed Amendment to
Facility Operating License DPR-67

In accordance with 10 CFR 50.30, Florida Power & Light Company submits herewith three (3) signed originals and forty (40) copies of a request to amend Appendix A of Facility Operating License DPR-67.

The proposed amendment is described below and shown on the attached Technical Specification page bearing the date of this letter in the lower right hand corner.

Page 3/4 9-4

Refueling Technical Specification 3.9.4.c is reworded to permit automatic actuation of a Containment Vacuum Relief Valve due to vacuum in containment.

The proposed amendment has been reviewed and the conclusion reached that it does not involve a significant hazards consideration, therefore, prenoticing pursuant to 10 CFR 2.105 should not be required. A written safety evaluation is attached.

Very truly yours,

Robert E. Uhrig

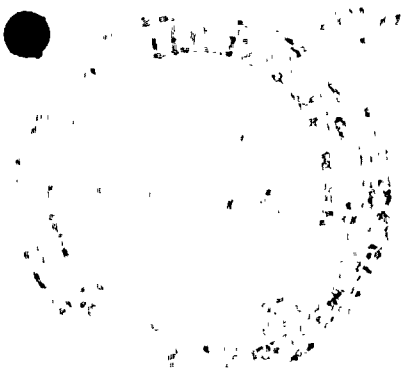
Robert E. Uhrig
Vice President

8450

REU/MAS/cpc

Attachments

cc: Mr. Norman C. Moseley
Jack R. Newman, Esquire



REFUELING OPERATIONS

CONTAINMENT PENETRATIONS

LIMITING CONDITION FOR OPERATION

3.9.4 The containment penetrations shall be in the following status:

a. The equipment door closed and held in place by a minimum of four bolts,

b. A minimum of one door in each airlock is closed, and

c. Each penetration providing direct access from the containment to the outside atmosphere, except as provided in Table 3.6-2 of Specification 3.6.3.1 and except for automatic actuation of the Containment Vacuum Relief Valves due to vacuum in containment, shall be either:

1. Closed by an isolation valve, blind flange, or manual valve, or

2. Be capable of being closed by an OPERABLE automatic containment isolation valve.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.4 Each of the above required containment penetrations shall be determined to be either in its closed/isolated condition or capable of being closed by an OPERABLE automatic containment isolation valve within 72 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment by:

a. Verifying the penetrations are in their closed/isolated condition, or

b. Testing the containment isolation valves per the applicable portions of Specifications 4.6.3.1.1 and 4.6.3.1.2.

SAFETY EVALUATION

Introduction

This Safety Evaluation supports a proposed revision to refueling Technical Specification 3.9.4 to permit automatic actuation of a containment vacuum relief valve due to vacuum in containment. The intent is to clarify the specification and ensure that actuation of vacuum relief valves for the purpose of satisfying their design function is not interpreted as affecting containment integrity.

Discussion

During initial core loading, a containment purge fan was started and containment pressure became sufficiently sub-atmospheric to cause a containment vacuum relief valve to open. This was in conflict with the wording of Technical Specification 3.9.4 which requires that, during refueling operations, there be no direct access from containment to the outside atmosphere which is incapable of automatic isolation.

The containment vacuum relief valves cannot be automatically closed or opened by operator action because they are not designed to receive a Containment Isolation Signal (CIS) and do not have a manual or hand operator. They do not receive a CIS because they are designed to protect the containment structure from excessive vacuum. The occurrence was reported to the NRC Region II Office of Inspection and Enforcement on April 5, 1976 as Reportable Occurrence 335-76-4.

Refueling Technical Specifications do not presently consider the unique function of the containment vacuum relief valves. Although containment integrity as defined by the current specifications would not exist when these valves are open, it is emphasized that in order to open them (either automatically or for testing purposes) a vacuum must be sensed by the control instruments. Under these circumstances, any leakage through the vacuum relief valves would be leakage into containment and would be due to the vacuum which caused these valves to open in the first place. It should also be noted that, as containment pressure rises, the vacuum relief valves automatically close before reaching atmospheric pressure. Therefore, actuation of these valves for the purpose of performing their design function (protection of the containment vessel from excessive vacuum) does not violate the concept of containment integrity, because any leakage would be from the outside atmosphere into containment.

SAFETY EVALUATION (Continued)

Conclusion

Based on these considerations, (1) the proposed change does not increase the probability or consequences of accidents or malfunctions of equipment important to safety and does not reduce the margin of safety as defined in the basis for any technical specification, therefore, the change does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

Robert E. Uhrig, being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this said 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.

Robert E. Uhrig

Robert E. Uhrig

Subscribed and sworn to before me this
16th day of August, 1976

Helen J. Carson

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

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES NOV. 30 1979
BONDED THRU GENERAL INS. UNDERWRITERS

My commission expires: _____