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L-2019-055
10 CFR 50.90

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Florida Power & Light Company
St. Lucie Units 1 and 2, Docket Nos. 50-335, 50-389
Turkey Point Units 3 and 4, Docket Nos. 50-250, 50-251

NextEra Energy Seabrook, LLC
Seabrook Station, Docket No. 50-443

Subject: Supplement to Application to Add Limiting Condition for Operation (LCO) 3.0.6 to the Technical Specifications

Reference:

Florida Power & Light Company letter L-2018-049, "Application to Add Limiting Condition for Operation (LCO) 3.0.6 to the Technical Specifications," May 29, 2018 (ADAMS Accession No. ML18151A472)

In the referenced letter, Florida Power & Light Company (FPL) submitted a request for an amendment to the technical specifications (TS) for St. Lucie Units 1 and 2, Turkey Point Units 3 and 4, and, on behalf of NextEra Energy Seabrook, LLC, for Seabrook Station. The proposed amendments would modify the TS to incorporate the provisions of Limiting Condition for Operation (LCO) 3.0.6 in the improved standard TS (ISTS), which provide the actions to be taken when the inoperability of a support system results in the inoperability of related supported systems. In addition, the proposed change adds a new Safety Function Determination Program to the administrative section of the TS to ensure that a loss of safety function is detected and appropriate actions are taken when using the provisions of LCO 3.0.6.

A review of the license amendment request identified inconsistencies between sections of the request regarding the wording of two proposed changes for St. Lucie, Turkey Point, and Seabrook, and an omission in a proposed change that reformats a TS action in the Turkey Point TS. As discussed in the enclosure, this supplement clarifies the proposed changes as discussed in a conference call with the NRC staff on February 28, 2019. In addition, amendments to the Turkey Point TS occurred subsequent to submittal of the request to adopt LCO 3.0.6. The attachment to the enclosure provides revised markups of the proposed changes to the Turkey Point TS, which supersede the corresponding markups in the referenced letter.

This letter contains no new or revised regulatory commitments.

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This supplement does not alter the conclusions in the referenced letter that the changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the changes.

If you should have any questions regarding this submittal, please contact Steve Catron, Fleet Licensing Manager, at 561-304-6206.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 25th, 2019

Sincerely,

William Parks
Director, Nuclear Licensing and Regulatory Compliance
Florida Power & Light Company

Enclosure

cc: NRC Project Manager - St. Lucie
NRC Project Manger – Turkey Point
NRC Project Manager – Seabrook
Regional Administrator - NRC Region 1
Regional Administrator - NRC Region 2
NRC Resident Inspector - St. Lucie
NRC Resident Inspector – Turkey Point
NRC Resident Inspector - Seabrook
Ms. Cindy Becker, Florida Department of Health
Director Homeland Security and Emergency Management (New Hampshire)
Mr. John Giarrusso, Jr., Nuclear Preparedness Manager (Massachusetts)

ENCLOSURE

Clarification of Proposed Changes to Technical Specification 3.8.1.1 for St. Lucie, Turkey Point, and Seabrook

The license amendment request to adopt LCO 3.0.6 (LAR) adds two new requirements to the actions in St. Lucie, Turkey Point, and Seabrook Technical Specification (TS) 3.8.1.1, "A.C. Sources - Operating." First, as discussed in section 2.0 of the LAR, "Detailed Description," the following requirement is added to action a, which addresses an inoperable offsite A.C. circuit:

> "Within 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s), declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable."

The second new requirement is added to action d (St. Lucie) and action e (Seabrook and Turkey Point) for two inoperable offsite A.C. circuits:

> "Within 12 hours from discovery of two offsite circuits inoperable with inoperability of redundant required feature(s), declare required feature(s) inoperable when its redundant required feature(s) is inoperable."

Section 3.0 of the LAR, "Technical Evaluation," also discusses these two new requirements. However, the wording of the proposed changes in section 3.0 as shown below is different from that in section 2.0.

> "Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable within 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)."

> "Declare required feature(s) inoperable when its redundant required feature(s) is inoperable within 12 hours from discovery of two offsite circuits inoperable concurrent with inoperability of redundant required feature(s)."

Although the wording of the actions is inconsistent between sections 2.0 and 3.0 of the LAR, the directions provided by the actions are the same. The preferred wording for the proposed changes is the wording included in section 2.0 of the LAR. The markups of TS 3.8.1.1 included in the LAR for Seabrook and St. Lucie contain the preferred wording. The attachment to this enclosure provides a revised markup of TS 3.8.1.1 for Turkey Point that incorporates the preferred wording.

Additional Revisions to the Proposed Changes for Turkey Point

The LAR revises TS 3.8.1.1, actions c and e, in part, by reformatting the actions from a paragraph to a list of discrete steps. However, the list of steps associated with action c omitted the requirement to perform surveillance requirement (SR) 4.8.1.1.1.a on the remaining startup transformer and associated circuits within one hour and at least once per eight hours thereafter. The revised markup of TS 3.8.1.1 in the attachment to this enclosure adds the requirement to perform SR 4.8.1.1.1.a to the list of steps in action c.

The proposed change to reformat TS 3.8.1.1 actions c and e included a requirement for a four-hour NRC notification. However, Amendments 279 and 274 [Reference 1] eliminated the four-hour

notification requirements. As a result, the revised markup of TS 3.8.1.1 in the attachment to this enclosure incorporates this change.

Amendments 284 and 278 [Reference 2] modified actions a and b in TS 3.8.1.1 to permit use of risk informed completion times. The revised markup of TS 3.8.1.1 in the attachment to this enclosure incorporates this change.

The LAR proposed adding new administrative TS 6.7.4.n, "Safety Function Determination Program (SFDP)." However, Amendments 281 and 275 [Reference 4], Amendments 282 and 276 [Reference 3], and Reference 2 added administrative TS 6.7.4. n, o, and p, respectively. Therefore, the designation of the proposed new administrative TS for the Safety Function Determination Program is revised to TS 6.7.4. q. The revised markup of TS 6.7.4 in the attachment to this enclosure incorporates this change.

References

1. NRC letter "Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Issuance of Amendments Regarding the Elimination of Certain Technical Specifications Reporting Requirements (CAC Nos. MF9601 and MF9602; EPID L-2017-LLA-0213)," March 19, 2018 (ML 18019A078)
2. NRC letter "Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Issuance of Amendments Regarding Adoption of Risk-Informed Completion Times in Technical Specifications (CAC Nos. MF5455 and MF5456; EPID L-2014-LLA-0002)," December 3, 2018 (ML18270A429)
3. NRC letter "Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Issuance of Amendments Regarding Technical Specifications Pertaining to Explosive Gas Monitoring, Gas Decay Tanks, and Standby Feedwater System (CAC Nos. MG0143 and MG 0144; EPID L-2017-LLA-0272)," September 11, 2018 (ML18214A125)
4. NRC letter "Turkey Point Nuclear Generating Unit Nos. 3 and 4 - Issuance of Amendments Regarding Technical Specifications Pertaining to Inservice Testing Program and Inservice Inspection Program Requirements and Surveillance Frequency Control Program Applicability (CAC Nos. MF9907 and MF9908; EPID L-2017-LLA-0252)," June 12, 2018 (ML18130A466)

Attachment

Markup of the Turkey Point Technical Specifications

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

INSERT ACTION a

NOTE: LCO 3.0.4.b is not applicable to diesel generators.

a. ~~With one of two startup transformers or an associated circuit inoperable, demonstrate the OPERABILITY of the other startup transformer and its associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit is in MODE 1, reduce THERMAL POWER to ≤30% RATED THERMAL POWER within 24 hours, or restore the inoperable startup transformer and associated circuits to OPERABLE status within the next 48 hours or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. If THERMAL POWER is reduced to ≤30% RATED THERMAL POWER within 24 hours or if the inoperable startup transformer is associated with the opposite unit restore the startup transformer and its associated circuits to OPERABLE status within 30 days of the loss of OPERABILITY, or be in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. If the inoperable startup transformer is the associated startup transformer, and became inoperable while the unit was in MODE 2, 3, or 4, restore the startup transformer and its associated circuits to OPERABLE status within 24 hours or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours. This ACTION applies to both units simultaneously.~~

INSERT ACTION b

b. ~~With one of the required diesel generators inoperable, demonstrate the OPERABILITY of the above required startup transformers and their associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. Restore the inoperable diesel generator to OPERABLE status within 14 days** or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.~~

INSERT ACTION c

c. ~~With one startup transformer and one of the required diesel generators inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a on the remaining~~

** 72 hours if inoperability is associated with Action Statement 3.8.1.1.c.

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

~~startup transformer and associated circuits within one hour and at least once per 8 hours thereafter; and if the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, unless the diesel generators are already operating; restore one of the inoperable sources to OPERABLE status in accordance with Action Statements a and b, as appropriate. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. Restore the other A.C. power source (startup transformer or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 Action Statement a or b, as appropriate, with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable A.C. power source.~~

d. With one diesel generator inoperable, in addition to ACTION b. or c. above, verify that:

1. All required systems, subsystems, trains, components, and devices (except safety injection pumps) that depend on the remaining required OPERABLE diesel generators as a source of emergency power are also OPERABLE.

   If this condition is not satisfied within 2 hours, be in at least HOT STANDBY within the next 6 hours , and in COLD SHUTDOWN within the following 30 hours.

2. At least two Safety Injection pumps are OPERABLE and capable of being powered from their associated OPERABLE diesel generators.

   If this condition is not satisfied within 2 hours, be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours. This ACTION applies to both units simultaneously.

INSERT ACTION e

e. ~~With two of the above required startup transformers or their associated circuits inoperable; restore at least one of the inoperable startup transformers to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours* and in COLD~~

*If the opposite unit is shutdown first, this time can be extended to 42 hours.

INSERT ACTION a

a. With one of two startup transformers or an associated circuit inoperable:

1. Demonstrate the OPERABILITY of the other startup transformer and its associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter.

2. ***Within 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s), declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.***

3. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit is in MODE 1:

   a) Reduce THERMAL POWER to ≤30% RATED THERMAL POWER within 24 hours, or

   b) Restore the inoperable startup transformer and associated circuits to OPERABLE status within the next 48 hours or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

4. If THERMAL POWER is reduced to ≤30% RATED THERMAL POWER within 24 hours or if the inoperable startup transformer is associated with the opposite unit, restore the startup transformer and its associated circuits to OPERABLE status within 30 days of the loss of OPERABILITY, or be in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours.

5. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit was in MODE 2, 3, or 4 restore the startup transformer and its associated circuits to OPERABLE status within 24 hours or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours. This ACTION applies to both units simultaneously.

INSERT ACTION b

b. With one of the required diesel generators inoperable:

1. Demonstrate the OPERABILITY of the above required startup transformers and their associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter.

2. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY.

3. Restore the inoperable diesel generator to OPERABLE status within 14 days** or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

INSERT ACTION c

---*NOTE*---

Enter applicable ACTIONS of LCO 3.8.3.1, "Onsite Power Distribution - Operating," when ACTION c is entered with no AC power source to any train.

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c. With one startup transformer and one of the required diesel generators inoperable:

1. Demonstrate the operability of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a on the remaining startup transformer and associated circuits within one hour and at least once per 8 hours thereafter.

2. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable diesel generator does not exist on the remaining required diesel generators, unless the diesel generators are already operating. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY.

3. Restore one of the inoperable sources to OPERABLE status in accordance with Action Statements a and b, as appropriate.

4. Restore the other A.C. power source (startup transformer or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 Action Statement a or b, as appropriate, with the time requirement of that Action Statement based on the time of initial loss of the remaining inoperable A.C. power source.

INSERT ACTION e

e. With two of the above required startup transformers or their associated circuits inoperable:

1. ***Within 12 hours from discovery of two offsite circuits inoperable concurrent with inoperability of redundant required feature(s), declare required feature(s) inoperable when its redundant required feature(s) is inoperable.***

2. Restore at least one of the inoperable startup transformers to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours* and in COLD SHUTDOWN within the following 30 hours. This ACTION applies to both units simultaneously.

3. With only one startup transformer and associated circuits restored, perform Surveillance Requirement 4.8.1.1.1a on the OPERABLE Startup transformer at least once per 8 hours, and restore the other startup transformer and its associated circuits to OPERABLE status or shutdown in accordance with the provisions of Action Statement 3.8.1.1a with time requirements of that Action Statement based on the time of initial loss of a startup transformer. This ACTION applies to both units simultaneously.

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

~~SHUTDOWN within the following 30 hours. This ACTION applies to both units simultaneously. With only one startup transformer and associated circuits restored, perform Surveillance Requirement 4.8.1.1.1a on the OPERABLE Startup transformer at least once per 8 hours, and restore the other startup transformer and its associated circuits to OPERABLE status or shutdown in accordance with the provisions of Action Statement 3.8.1.1a with time requirements of that Action Statement based on the time of initial loss of a startup transformer. This ACTION applies to both units simultaneously.~~

f. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two startup transformers and their associated circuits by performing the requirements of Specification 4.8.1.1.1a. within 1 hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore all required diesel generators to OPERABLE status within 14 days from time of initial loss or in accordance with the Risk Informed Completion Time Program, or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

g. Following the addition of the new fuel oil* to the Diesel Fuel Oil Storage Tanks, with one or more diesel generators with new fuel oil properties outside the required Diesel Fuel Oil Testing Program limits, restore the stored fuel oil properties to within the required limits within 30 days.

h. With one or more diesel generators with stored fuel oil total particulates outside the required Diesel Fuel Oil Testing Program limits, restore the fuel oil total particulates to within the required limits within 7 days.

* The properties of API Gravity, specific gravity or an absolute specific gravity; kinematic viscosity; clear and bright appearance; and flash point shall be confirmed to be within the Diesel Fuel Oil Testing Program limits, prior to the addition of the new fuel oil to the Diesel Fuel Oil Storage Tanks.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

p. Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09, "Risk-Informed Technical Specifications Initiative 4b: Risk-Managed Technical Specifications (RMTS) Guidelines," Revision 0-A, November 2006. The program shall include the following:

a. The RICT may not exceed 30 days;

b. A RICT may only be utilized in MODES 1 and 2;

c. When a RICT is being used, any plant configuration change within the scope of the Risk Informed Completion Time Program must be considered for the effect on the RICT.

1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.

2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.

d. Use of a RICT is not permitted for entry into a configuration which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE.

e. If the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:

1. Numerically accounting for the increased possibility of CCF in the RICT calculation, or

2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.

INSERT SFDP

6.8.5 DELETED

INSERT SFDP

q. Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.7, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system ACTIONs. This program implements the requirements of LCO 3.0.7. The SFDP shall contain the following:

a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected,

b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists,

c. Provisions to ensure that an inoperable supported system's completion time is not inappropriately extended as a result of multiple support system inoperabilities, and

d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, no concurrent loss of offsite power, or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

a. A required system redundant to the system(s) supported by the inoperable support system is also inoperable, or

b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable, or

c. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate ACTIONs of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate ACTIONs to enter are those of the support system.