



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 21, 2021

Mr. Dan DeBoer
Site Vice President
Florida Power & Light Company
6501 S. Ocean Drive
Jensen Beach, FL 34957

SUBJECT: ST. LUCIE PLANT, UNIT NOS. 1 AND 2 – SUPPLEMENTAL INFORMATION
NEEDED FOR ACCEPTANCE OF LICENSING AMENDMENT REQUEST
CONCERNING TECHNICAL SPECIFICATION CONVERSION TO
NUREG-1432, REVISION 5 (EPID L-2021-LLI-0000)

Dear Mr. DeBoer:

By letter dated September 15, 2021 (Agencywide Documents Access and Management System (ADAMS Accession No. ML21265A284), Florida Power and Light Company (FPL, the licensee) submitted a license amendment request for St. Lucie Plant, Unit Nos. 1 and 2 (St. Lucie). The proposed amendment would revise the current technical specifications to reflect adoption of NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 5. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements for the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that FPL supplement the application to address the information requested in Enclosure 1 by January 19, 2022. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its activities associated with the application. If the application is subsequently accepted for review, you will be advised of any

further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Bill Maher of your staff on December 16, 2021. Additionally, in Enclosure 2, the NRC staff has included a list of editorial issues. The items in Enclosure 2 included for your information only.

If you have any questions, please contact Nate Jordan at (301) 415-7410 or Natreon.Jordan@nrc.gov.

Sincerely,

/RA MMahoney for/

Natreon Jordan, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-335 and 50-389

Enclosure:

1. Supplemental Information Needed
2. Identified Editorial Issues

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED

CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS

FLORIDA POWER AND LIGHT COMPANY

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

NOTE: All page numbers are taken from the PDF file page count for the associated document in the Agencywide Documents Access and Management System (ADAMS).

ITS SECTION SPECIFIC *Unless otherwise noted, each list item applies to both St. Lucie units.*

Volume 5 – Section 3.0 (ADAMS Accession No. ML21265A290)

1. ITS Limiting Condition for Operation (LCO) 3.0.9 - page 61 – The STS Section 3.0 Bases contains a reviewer’s note that states: “Adoption of LCO 3.0.9 requires the licensee to make the following commitments:
 - [LICENSEE] commits to the guidance of NUMARC 93–01, Revision [4F], Section 11, which provides guidance and details on the assessment and management of risk during maintenance.
 - [LICENSEE] commits to the guidance of NEI 04–08, “Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF–427) Industry Implementation Guidance,” March 2006.”

These commitments do not appear in the application. The licensee is requested to provide additional information to support this change to adopt STS LCO 3.0.9.

Volume 6 – Section 3.1 (ADAMS Accession No. ML21265A291)

1. ITS 3.1.1 - pages 46 and 48 – Discussion of Changes (DOC) L03 discusses the removal of CTS 4.1.1.1.d (“The SHUTDOWN MARGIN shall be determined to be within the core operating limit report (COLR) limits: d. Prior to initial operation above 5% RATED THERMAL POWER after each fuel loading, by consideration of the factors of e. below, **with the control element assembly calculators (CEA) groups at the Power Dependent Insertion Limits** of Specification 3.1.3.6 [REGULATING CEA INSERTION LIMITS].”) and that ITS Surveillance Requirement (SR) 3.1.2.1 (“Verify overall core reactivity balance is within $\pm 1.0\%$ $\Delta k/k$ of predicted values. Prior to entering MODE 1 after fuel loading”) gives confidence that these predicted values are within limit. DOC L03 asserts:

“The purpose of CTS 4.1.1.1.d is to verify core design predictions by determining the SDM with the CEAs at the insertion limits. This change is acceptable because the deleted Surveillance Requirement is not necessary to verify the LCO [“3.1.1.1 The SHUTDOWN MARGIN shall be within the limits specified in the COLR.”] is within limit. The core design predictions, such as rod worth, boron worth, and critical boron concentration, are verified in a manner and at a Frequency necessary to give confidence that these

predicted values are within limit in accordance with ITS SR 3.1.2.1. ITS SR 3.1.2.1 has a conditional Frequency similar to that of CTS 4.1.1.1.d requiring performance prior to entering MODE 1 (> 5% [rated thermal power] RTP) after fuel loading. To ensure the SDM is within limits during reactor startup the critical boron concentration is verified during the startup physics test program. ... Therefore, the core design parameters upon which SDM relies are verified before exceeding 5% RATED THERMAL POWER after each fuel loading.”

It is not clear that “**with the CEA groups at the [power dependent insertion limits] (PDILs)**” that a SDM determination in MODE 2 with the reactor critical is equivalent to a core reactivity balance verification in MODE 2 with the reactor critical.

Explain how ITS will ensure that the “startup physics test program” verifies the post refueling criticality prediction is satisfied, and appropriate actions are taken if it is not.

2. ITS 3.1.6 - pages 192, 197, 203, 208, and 211 – Regarding the ITS SR 3.1.6.1 (“Verify each regulating CEA group position is within its insertion limits. In accordance with the [Surveillance Frequency Control Program] SFCP”) Surveillance column note that permits 12 hours after entry into MODE 2 to verify the regulating rod group positions are within COLR limits. DOC L02 asserts adding this note is less restrictive because it is an allowance not included in corresponding Units 1 and 2 CTS SR 4.1.3.6 (“The position of each regulating CEA group shall be determined to be within the Power Dependent Insertion Limits in accordance with the Surveillance Frequency Control Program ...”). DOC L02 says the SFCP gives 12 hours as the Frequency of this Surveillance.

However, entry into MODE 2 is currently allowed without meeting the CTS 4.1.3.6 Surveillance, since CTS 3.1.3.6 Applicability says “MODE 2 with $k_{eff} \geq 1.0$ ”; even so, can the Surveillance be performed $\leq 5\%$ RTP, before entry into MODE 1?

If CTS SR 4.1.3.6 cannot be performed before being in MODE 2 with $k_{eff} \geq 1.0$ (before criticality is achieved), then entry into CTS 3.1.3.6 ACTION “a.” would be required and it allows 2 hours to verify rod insertion limits are met; that is, 2 hours to complete CTS SR 4.1.3.6.

If the licensee agrees with this reading of the CTS, the staff requests that the licensee revise DOC L02 to explain that the 12 hour delay after MODE 2 entry of ITS SR 3.1.6.1 is less restrictive because it is longer than the 2 hours permitted by CTS 3.1.3.6 ACTION a. Staff recognizes that CTS SR 4.0.4 allows entering LCO 3.1.3.6 Applicability with SR 4.1.3.6 not met as allowed by CTS LCO 3.0.4.b, which requires risk to be assessed and managed.

Volume 8 – Section 3.3 (ADAMS Accession No. ML21265A293)

1. On page 28/450 – The Unit 2 CTS 3.3.1.x markup indicates that a “proposed” note should be added to SR 3.3.1.8 (Unit 2). There is no note added in the ITS as shown on the markup of STS 3.3.1. The ITS SR 3.3.1.8 does include the Surveillance column note from the STS. It is not clear whether the licensee only wants the STS note or if there is another note that is intended to be added. No other STS notes are called out as being added. The discussion of a proposed note is not included for any other adoption of STS notes. DOC L05 adequately discusses the STS note that says, “Neutron detectors are excluded from

the CHANNEL CALIBRATION.” Please provide clarification for if only the STS note or another note should be added to ITS SR 3.3.1.8.

2. On pages 63, 75, 199, and 161/450 – STS SR 3.3.1.7 requires the automatic bypass removal function to be tested within 92 days of startup. For Unit 1, CTS SR 4.3.1.1.2 requires the “logic for the bypasses” be demonstrated OPERABLE during at power functional tests. For Unit 2, CTS SR 4.3.1.2 requires the logic for the bypasses be demonstrated OPERABLE within 92 days of startup. The Frequency of corresponding ITS SR 3.3.1.7 is in accordance with the SFCP. ITS SR 3.3.1.7 requires a CHANNEL FUNCTIONAL TEST of each automatic bypass removal function. In the ITS 3.3.1 Bases for SR 3.3.1.,7 in the first paragraph, there is a discussion of why this SR is important to be done prior to startup. There is discussion about when the SR is completed that is consistent with the STS Bases for the Frequency of STS 3.3.1.7, but not consistent with the ITS Surveillance Frequency of “In accordance with the SFCP,” not 92 days prior to startup. Why is the SFCP an acceptable Frequency for this Surveillance when the 92 days prior to startup is described as applicable per a topical report and the CTS (at least for Unit 2) require the 92 days prior to startup Frequency? How does the licensee assure adequate reliability of the affected reactor trip Functions? The STS does not allow the SFCP for this SR, but the Unit 1 CTS does, and both units’ ITS propose to do so. The ITS 3.3.1 Bases discussion under SR 3.3.1.7 should be revised to reflect the adequacy of the Surveillance Frequency as it relates to the referenced topical report. The use of the SFCP must be justified, at least for Unit 2. Alternately, the plant could adopt the STS Frequency.
3. On pages 63/450 and 75/450 – CTS, footnote “a” from Table 3.3-1 states that the bypass for the Variable Power Level – High reactor trip Function is automatically removed based on wide range neutron flux power. The ITS and STS both refer to percent of RATED THERMAL POWER. The power level for bypass removal is consistent with CTS (1% for Unit 1 and 0.5% for Unit 2), but the STS has a much lower power level (1E-4%). Why is it acceptable to adopt the STS power measurement source, but maintain the power level from the CTS?
4. On page 78/450 – the thermal margin/low pressure (TM/LP) trip value was changed to include a minimum pressure allowable value. M06 only discusses Unit 1. Unit 2 has a similar, but different pressure value added as a minimum allowable. Should M06 include discussion of Unit 2? The notes in the U-2 ITS markup does not reference M06.
5. On pages 94/450 and 134/450 – In the addition to the first paragraph what is “key capture?” Please provide a description of the term.
6. On pages 96/450, 136/450, and other occurrences in the bases – The referenced page numbers are the first occurrences for each unit. Applies to both units. In many cases in the bases, information is deleted with no explanation or justification. These point to justification for deviation (JFD) 1 that is just a generic statement of adopting plant specific information. Examples include:
 - a. Anticipated operational occurrences (AOOs) and accidents that were listed as being mitigated by an RPS trip are deleted and there is no discussion of how these events are handled by RPS at St. Lucie. UFSAR review to determine which trip is applicable to which AOO or accident was fruitless. Provide what trips are credited for the mitigation of the deleted events or explain why those events do not require mitigation by the RPS.

- b. Descriptions of trip setpoint margins that are in the NUREG are deleted without any justification or any replacement by plant specific margin discussions. Provide margin discussions for St. Lucie equivalent to the NUREG discussion that are deleted or justify that the descriptions are not required.
7. On pages 96/450 and 136/450 Both Units - The Bases imply that even though the Power Rate of Change - High trip may be bypassed under some conditions, the indication is still required to be operable. How is this ensured by the TS?
8. On pages 96/450 and 136/450 Both Units - Under Item 1, Main Steam Line Break (MSLB), what is backup protection? Is this defined or explained somewhere?
9. On pages 98/450 and 138/450 Both Units - The excess load event is described differently for the steam generator (SG) low level and TM/LP trips. It is also inconsistent between units. It seems that all 4 should be the same. Is there a different event for inadvertent opening of a steam generator atmospheric dump valve (ADV) or main steam safety valve (MSSV)?
10. On pages 100/450 and 140/450, Both Units - At the bottom of the page it is stated that the TM/LP, SG delta P, and Rx coolant flow low trips are unbypassed automatically. Should the variable power level high trip be included here? It has the same footnote as the other trips in Table 3.3.1-1.
11. On pages 102/450 and 142/450, Both Units – The 4th paragraph under Item 1 changes 112% to 107%. The NUREG has the setpoint at 107% and the maximum possible value at 112%. The ITS has both set at 107%. This is inconsistent and does not allow for calibration errors, etc.
12. On pages 102/450 and 142/450 – Both Units - Why is the 5th paragraph deleted? What is the equivalent plant specific information? If not required, what is the basis?
13. On pages 102/450 and 142/450 – Both Units - Item 2, Power Rate of Change – High does not discuss the ability to bypass the trip as is included for other trips? Should this be added? Additionally, it is not discussed that the trip may be bypassed below 1E-4% RTP.
14. On pages 102/450 and 142/450, Both Units – Item 2, Power Rate of Change – High has the discussion regarding the modes of applicability deleted. There is not adequate justification for this. Even though the lower modes are discussed in a different TS this is the same as the NUREG. Should maintain consistency with the NUREG.
15. On pages 103-105/450 and 143-145/450 – both Units - Under items 3, 4, 6, 7, and 9 information regarding uncertainty and harsh environment is deleted and no plant specific information is added. No basis is provided. No plant specific information is provided.
16. On pages 105/450 and 145/450, Both Units – Under item 8 it is stated that the trip is automatically bypassed at less than 15% power. The TS require the trip to be automatically unbypassed above 15% power. This is an important function that should be described.
17. On pages 105/450 and 145/450, Both Units – Under item 9.b information regarding uncertainty is deleted and no plant specific information is added. No basis is provided.

18. On pages 107/450 and 147/450, Both Units – Under item Applicability, the paragraph at the top of the page on lower modes is deleted with no supporting justification. The NUREG retains this paragraph and refers to LCO 3.3.3. For St. Lucie the paragraph should refer to LCO 3.3.2. Consistency with the NUREG should be maintained where possible.
19. On pages 110/450 and 152/450, Both Units – Under Action G.1 why is Action F included? The trips in F are explicitly excluded in the TS.
20. On pages 112/450 and 154/450 – Both units - Under SR 3.3.1.1 why is the sentence regarding the CHANNEL CHECK supplementing less formal, but more frequent checks deleted? Are these more frequent checks not performed at St. Lucie?
21. On pages 115/450 and 157/450, and other SRs with similar notes – Both Units - Under SR 3.3.1.4 the discussion of the first note is not clear. The added e.g., statement is not clear. Also, “but conservative wrt to the allowable value” is not consistent with the note in the TS table. The treatment of the added e.g., statement is not consistent for SRs 3.3.1.5, 3.3.1.6, and 3.3.1.8. It seems like all of these should read similarly. Also see similar notes in the Background sections (pages 87 and 127).
22. Both Units – Adoption of TSTF-569 is made without discussing that the TSTF is applicable to the plant or stating that the licensee has verified that the traveler and SE are applicable. The LAR needs to justify adoption of the traveler to the plant.

Volume 9 – Section 3.4 (ADAMS Accession No. ML21265A294)

1. On page 5/677 – Please provide plant-specific justification for the proposed change in LCO 3.4.1 Action B Completion Time from 4 hours to 6 hours.
2. On page 83/677 “Justification for Deviation #5 states, “ISTS 3.4.3, Required Action B.2 is modified to delete the requirement to reduce RCS pressure < [500] pounds per square in gauge (psig). CTS 3.4.9.1 actions, in the condition when actions and associated completion times are not met, only require a reduction of RCS T_{avg} to less than 200°F (i.e., MODE 5). The ITS is consistent with the equivalent CTS requirement and licensing basis.” Please note, ITS 3.4.3, Required Action B.2 requires to be in MODE 5 with RCS pressure less than [500] psig. Please explain how the ITS Action is consistent with the equivalent CTS Action.”

Volume 10 – Section 3.5 (ADAMS Accession No. ML21265A295)

1. The application does not propose adopting STS 3.5.5, “TSP,” for PSL Unit 1, but does not include a Discussion for Deviation in a corresponding Attachment to Enclosure 2 Volume 10. This omission is inconsistent with the rest of the application.

Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A296)

1. On page 7/492 – PSL U1 CTS 3.6.1.2 markup is described in part by DOC A02. It appears that DOC A02 does not describe deleting the CTS 3.6.1.2 requirement to “restore the overall leakage rate ... prior to increasing the reactor coolant system temperature above 200F.” Provide justification for deleting this requirement.

2. On page 13/492 – PSL U1 CTS 3.6.1.2 markup is described in part by DOC A02. It appears that DOC A02 does not describe deleting the CTS 3.6.1.2 requirement to “restore the overall leakage rate ... prior to increasing the reactor coolant system temperature above 200F.” Provide justification for deleting this requirement.
3. On page 75/492 – PSL U2 B 3.6.2 markup to the Applicable Safety Analysis shows Pa as 43.43 psig. Based on CTS, it appears this Pa value is incorrect (see CTS 6.8.4.h for Containment Leakage Rate Testing Program; see also ITS 5.5.13.b).
4. On page 102/492 – PSL U2 CTS 3.6.1.7 markup contains a NOTE that was not fully adopted by the corresponding ITS 3.6.3 ACTION E.2 Notes (page 132). It appears that ITS 3.6.3 ACTION E.2 Note 2 was deleted (part of CTS NOTE) without justification. Provide justification for deleting ITS 3.6.3 ACTION E.2 Note 2.
5. On page 149/492 – PSL U1 B 3.6.3 markup deletes the Reviewers Note related to purge valves. The note explains that the options for purge valve leakage are based primarily on the design. The justification for purge valve leakage did not address the Reviewers Note.
6. On page 219/492 – PSL U1 B 3.6.3 Applicable Safety Analysis markup inserts temperature values without support. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated temperature information.
7. On page 224/492 – PSL U2 B 3.6.3 Applicable Safety Analysis markup inserts temperature values without support. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated temperature information.
8. On page 318/492 – PSL U2 SR 3.6.7.3. No basis for shield building flowrate and time limit values is provided in ITS SR 3.6.7.3. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated information.
9. On page 334/492 – PSL U2 B 3.6.7: SR Bases discussion for SR 3.6.7.3 provides a time limit value that differs from the actual SR. There should not be a difference between the actual SR and the SR Bases.
10. On page 354/492 – PSL U2 B 3.6.8 INSERT 1 adds American Society of Mechanical Engineers (ASME) Code information regarding “containment external pressure load” (1.05 psig) that is different from the ASME Code information provided in the PSL Unit 2 UFSAR (see page 3.8-10).
11. On page 433/492 – PSL U1 SR 3.6.10.5 adds flow rate (gpm) information that is different from CTS SR 4.6.2.2.d (the ITS has a different flow band as compared to the CTS).
12. On page 233/492 and 238/492 Unit 1 and Unit 2 – CTS 3.6.2.1 Action 1.a (one containment spray train inoperable), has a restore time of 72 hours or in accordance with the Risk Informed Completion Time. The CTS markup proposed to change the restore time to 7 days or in accordance with the Risk Informed Completion Time. A discussion for this change is provided in ITS 3.6.6 DOC L01. The associated ISTS Bases 3.6.6 markup (see ITS Section 3.6.6 pdf page 271 (U1) or 286 (U2)) for this condition (one containment spray train inoperable) has a reviewer’s note that states: “Utilization of the 7 day Completion Time for Required Action A.1 [one containment spray train inoperable] is dependent on the licensee adopting CE NPSD-1045-A (Ref. 6) and meeting the requirements of the Topical Report and the associated Safety Evaluation including the

following commitment: “[LICENSEE] has enhanced its Configuration Risk Management Program, as implemented under 10 CFR 50.65(a)(4), the Maintenance Rule, to include a Large Early Release Fraction assessment to support this application.” Otherwise, a 72 hour Completion Time applies.” Based on ITS 3.6.6 DOC L01, it appears that there was no consideration given to adoption of CE NPSD-1045-A and the associated Safety Evaluation and commitment. Provide an explanation for why there was no discussion of the proposed change consistent with the ISTS Bases 3.6.6 described above. In addition, describe how the limitations specified in the Topical Report and in the associated NRC safety evaluation, as well as the commitment, are met or are not applicable.

13. On page 385/492 – CTS SR 4.6.6.1.d.4 requires verifying that each system (shield building ventilation system) achieves a negative pressure greater than a specified value in the fuel storage building after actuation of a signal. The proposed ITS SR that appears to satisfy CTS SR 4.6.6.1.d.4 is ITS SR 3.6.9.5. However, ITS SR 3.6.9.5 does not require verifying that each shield building ventilation system can produce the negative pressure. Therefore, it appears that the ITS SR is less restrictive than the CTS SR and there is no justification provided. Please evaluate and provide the justification for this apparent less restrictive change.
14. On page 316/492 – CTS SR 4.6.6.1.c.4 requires that each system (shield building ventilation system) produces a negative pressure (greater than or equal to a specified value) in the annulus within a specified time after a start signal. The proposed ITS SR that appears to satisfy this CTS requirement is ITS SR 3.6.7.3. However, ITS SR 3.6.7.3 does not require to verify that each shield building ventilation system can produce the negative pressure and timing requirements. Therefore, it appears that the ITS SR is less restrictive than the CTS SR and there is no justification provided. Please evaluate and provide appropriate justification for this apparent less restrictive change.
15. On page 318/492 – CTS SR 4.6.6.1.d.3 requires that each system (shield building ventilation system) produces a negative pressure (greater than or equal to a specified value) in the annulus within a specified time after a start signal. The proposed ITS SR that appears to satisfy this CTS requirement is ITS SR 3.6.7.3. However, ITS SR 3.6.7.3 does not require to verify that each shield building ventilation system can produce the negative pressure and timing requirements. Therefore, it appears that the ITS SR is less restrictive than the CTS SR and there is no justification provided. Please evaluate and provide appropriate justification for this apparent less restrictive change.

Volume 12 – Section 3.7 (ADAMS Accession No. ML21265A297)

1. LCO 3/4.7.6 “Flood Protection” is proposed to be deleted from Unit 2 TS but is not discussed in Volume 12 of the application. Provide a discussion of changes for this item including a 10 CFR 50.36(c)(2)(ii) Criteria Evaluation.

Volume 13 – Section 3.8 (ADAMS Accession No. ML21265A298)

1. On page 96 and 97/540 – Unit 1 Bases Insert 3 contains details related to power supply capabilities, which appear to describe alternative paths to create an operable offsite circuit. There does not appear to be an SR to test the alternative path to create an offsite circuit. Unit 2 Bases markup contains a similar Insert. Please provide discussions of the existing licensing basis relative to offsite sources and whether or not an evaluation was performed to determine if a SR is necessary to verify this path remains operable.

2. On page 98/540 – Unit 1 Bases Insert 4 contains statements related to a start up transformer's compliance with criterion for shared systems between units when aligned to ESF buses of both units. There does not appear to be a reference to Current Licensing Basis documentation to support the statements added to the Bases. Please provide a reference to Current Licensing Basis documentation to support the statements for Unit 1 and Unit 2 Bases.
3. On pages 42 and 43/540 – DOC L03 does not state that TSTF-422 was explicitly approved for CTS 3.8.1 Action f. More justification may need to be presented in DOC L03.
4. On page 209/540 – Unit 1 and 2 Bases Insert 1 contains details related to power supply capabilities, which appear to describe alternative paths to create an operable offsite circuit. There does not appear to be an SR to test the alternative path to create an offsite circuit. Unit 2 Bases markup contains a similar Insert. Please provide discussions of the existing licensing basis relative to offsite sources and whether or not an evaluation was performed to determine if a SR is necessary to verify this path remains operable. This Insert also exists in Bases for ITS 3.8.1.
5. On pages 243 and 252/540 – There is no explicit SR text in SR 3.8.3.1 to test and verify the capability to move oil between Unit 1 tanks or Unit 2 excess supply. Please provide more explanation regarding DFO licensing basis and why there is no explicit SR text to test and verify the capability to move oil between Unit1 tanks or Unit 2 excess supply. While the proposed ITS Bases for U1 SR 3.8.3.1 mentions implied requirements, the proper location for requirements is in the TS themselves, Bases should explain the reason for the test.
6. On page 432/540 – The reviewer's note mentions MODE 4 end states require commitments to follow guidance in NUMARC 93-01 and WCAP-16364-NP. Since U1 did not have an inverter spec previously, please confirm the commitments made during TSTF-422 adoption for Unit 2 will apply to Unit 1 with respect to inverters. The commitments are not mentioned in Enclosure 5.
7. On pages 490 and 499/540 – The final sentence of Insert 1 to the Bases states "...are not required to be entered, since LCO 3.0.6 allows this exception..." This is a partially inaccurate paraphrase of the LCO 3.0.6 exception to LCO 3.0.2. Insert 1 fails to acknowledge the other portion of LCO 3.0.6 which requires an evaluation in accordance with the Safety Function Determination Program. To prevent confusion between LCO requirements in TS and the reason for the requirements in TS Bases, this Insert should be deleted.
8. On pages 188, 189, 190, 191, and 198/540 – The markup of the Applicability statement of CTS 3.8.1.2, "[AC Sources –] Shutdown," for PSL Unit 1 shows addition of "During movement of irradiated fuel assemblies." For PSL Unit 2, the markup of the Applicability statement of CTS 3.8.1.2 shows addition of "During movement of recently irradiated fuel assemblies." The markups indicate that these changes for both units are addressed by DOC M01; however, this DOC does not address the use of the word "recently," which was introduced by TSTF-51.

The markup of the Applicability of STS 3.8.2, "AC Sources – Shutdown," for both units indicates that the bracketed word "recently" is not adopted in ITS 3.8.2 by lining it out, as

shown: “During movement of [recently] irradiated fuel assemblies.” The word “recently” is also included in brackets in STS 3.8.2 Required Actions A.2.1 and B.1 (which both state: “Suspend movement of [recently] irradiated fuel assemblies. Immediately”). The markup indicates that these differences for both units are addressed by Specification JFD 2. JFD 2 does not explicitly explain the omission of “recently.”

The related passages in the STS 3.8.2 Bases, which are also not being adopted, are called out in Issue 11, which should be treated as part of Issue 10.

Note that the Applicability of Unit 1 CTS 3.9.4 and Unit 2 CTS 3.9.9, is the same as for STS 3.9.3, “Containment Penetrations,” and is “During movement of recently irradiated fuel within the containment.” And ITS 3.9.3 for both units maintains this Applicability as well as use of the phrase “recently irradiated fuel.” Since it appears that for this Specification, the CTS have previously adopted TSTF-51, with deviations, the licensee is requested to summarize in appropriate JFDs for all affected ITS Subsections the PSL implementation of deviations from TSTF-51, and where the post-shutdown irradiated fuel decay time value is located and how it is controlled to ensure the assumption of the UFSAR Fuel Handling Accident analysis is respected.

9. On pages 206, 207, 208, 210, 213, 214, 215, 217, and 220/540 – The markup of STS B 3.8.2 for ITS B 3.8.2 for both units shows by redline-strikeout the non-adoption of the bracketed word “recently” in the phrase “...during movement of [recently] irradiated fuel assemblies...” This marked up phrase is shown as indicated in the ‘Applicable Safety Analyses’ (ASA) and ‘Applicability’ Bases sections, initial paragraph; the ASA section also shows by redline-strikeout the non-adoption of the bracketed STS B 3.8.2 passage: “[involving handling recently irradiated fuel. Due to radioactive decay, AC electrical power is only required to mitigate fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)]”; the LCO Bases section markup first paragraph shows by redline-strikeout the non-adoption of the bracketed STS B 3.8.2 passage: “[involving handling recently irradiated fuel]”; the initial paragraph of the Applicability Bases section markup also shows by redline-strikeout the non-adoption of the bracketed STS B 3.8.2 passage: “[involving handling [recently] irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)]”; the markup of the Bases for STS 3.8.2 Required Actions A.1, A.2.1, and B.2, for both units, shows by redline-strikeout the non-adoption of the bracketed word “recently” in the phrase “...[recently] irradiated fuel...”

The STS 3.8.2 Bases markups indicate that these differences for both units are addressed by Bases JFD 2. JFD 2 does not explicitly explain the omission of “recently” and the above noted passages. Address this with related comment for ITS Specification 3.8.2.

EDITORIAL ITEMS IDENTIFIED

CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS

FLORIDA POWER AND LIGHT COMPANY

ST. LUCIE PLANT, UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

Volume 8 – Section 3.3 (ADAMS Accession No. ML21265A293)

1. On pages 68, 69,80, and 81/450, Both Units – The ITS say to insert figure 2.2-1, but there does not appear to be adequate space on the page. If another page is added the page numbering will be incorrect. Also figure 3.3.1-3 on ITS page 3.3.1-12 (taken from CTS figure 2.2-2) is labeled page 1 of 1, but it appears to be page 2 of 2. Figure 2.2-1 appears to be page 1 of 2.
2. On pages 88 and 128/450 and others, Affects Both Units – The bases refer to Variable Power Level – High Trip as the VPHT. Also, the term is written as Variable Power Level Trip – High. The TS Table 3.3.1-1 does not include the term “Trip.” The bases should be consistent with the TS and the acronym should be reflective of the name of the trip or be deleted. This issue shows up multiple times in the bases.
3. On pages 91 and 131/450 Both Units – The paragraph in the center of the page that describes the loss of load trip inputs is poorly worded and confusing. It does not describe where the pressure switches are connected to the turbine control system.
4. On pages 94 and 134/450 Both Units – In the addition to the bottom of the third paragraph – it appears that “manual enable” should be manually enabled.
5. On pages 96 and 136/450 Both Units – At the bottom of the page LCO 3.3.1.1 is referred to twice. I could not find LCO 3.3.1.1. LCO 3.3.1?
6. On page 100/450 – The name of the loss of load trip is not the same as the one listed in the TS table 3.3.1-1. Loss of Load (turbine hydraulic fluid pressure - low) is the TS name.
7. On page 100/450 – At the bottom of the page it is stated that the TM/LP, SG delta P, and Rx coolant flow low trips are unbypassed automatically at 1E-4%. Should this be 1% for U-1? 0.5% for Unit 2 appears to have been revised correctly on page 140.
8. On pages 101 and 141/450 Both Units – Under LCO, a change states that operation of a second channel bypassed is prevented. Is this prevented by design or by TS requirements? The original wording indicates that it is a design feature.
9. On pages 116 and 158/450 Both Units – Under SR 3.3.1.5 the change from tolerance to acceptance criteria band also requires “the” to be added for grammatical correctness.
10. On pages 118 and 160/450 Both Units – Under SR 3.3.1.5 the change from tolerance to acceptance criteria band also requires band to be plural for grammatical correctness.

11. On pages 118 and 160/450 Both Units – Under SR 3.3.1.6 the text describing why the loss of load sensors cannot be tested during operation is deleted. What is the plant specific reason that these sensors cannot be tested? This text should be added or justification for deletion provided.
12. On pages 118 and 160/450 Both Units – Under SR 3.3.1.6 the text describing the requirements for the (Wide Range Logarithmic Neutron Flux Monitor) Power Rate of Change – High trip is deleted with no justification or explanation. Plant specific information should be provided here.
13. On page 40/450 – DOC A08 states that ITS Action G requires the plant to be in MODE 3 in 16 hours and MODE 4 in 12 hours if Condition G is entered. There is no requirement be in MODE 4 in the ITS.
14. On pages 63/450 and 75/450 (applies to both units) – The CTS notes in the left column lists Function 10 as corresponding to ITS SR 3.3.1.9, but that SR is not listed in ITS Table 3.3.1-1 for Function 10 (reactor trip on loss of load). Also, CTS SRs 4.3.1.3 and 4.3.1.1.3 require response time testing for all reactor trip Functions except neutron detectors. Does SR 3.3.1.9 apply to this trip?
15. On pages 112/450 and 154/450 – Both Units - throughout section - Under SR 3.3.1.2 in the description of the second Note, the word “daily” remains. In some places “daily” is deleted. In others it is left. This discrepancy should be resolved. It appears that daily should probably be deleted throughout for these cases unless the SFCP frequency is and will remain a daily check. This issue is throughout this section.

Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A296)

1. On page 356/492 – PSL U2 SR Bases information associated with SR 3.6.8.1 cites a reference but the reference number was deleted (redline strike through) and not replaced; it appears it should have been updated with the appropriate reference number.
2. On page 367/492 – PSL U2 CTS 3.6.6.1 ACTION b(1) markup refers in part to ITS 3.6.9 ACTION D. It appears that it should refer to ACTION C.
3. On page 367/492 – PSL U2 CTS SR 4.6.6.1.b markup is missing a reference to the ITS Section number (it simply states “See ITS”).
4. On page 11/492 – PSL U2 CTS 4.6.1.1.a markup refers to ITS SR 3.6.3.2 in the left margin. This appears to be in error given that CTS 4.6.1.1.a is associated with containment isolation whereas ITS SR 3.6.3.2 is associated with 8 inch purge valves. It is also inconsistent with ITS 3.6.3 markup (page 101) associated with CTS 4.6.1.1a. Please evaluate and make appropriate change.
5. On page 45/492 – DOC A05 is associated with adding “... SR 3.6.2.1 Notes 1.” It appears that it should be add Notes 1 “and 2.” See pdf page 59 for SR 3.6.2.1, which shows both Note1 and Note 2 being added.

6. On page 257 – PSL U1 ITS SR 3.6.6.10 cites (in the left margin) CTS 4.6.2.1.d. This appears to be incorrect (should be CTS 4.6.2.1.e.?). Please evaluate and make necessary corrections.
7. On pages 302 and 306/492 – In the left margin of CTS SR 4.6.6.2, there is a pointer to “LCO 3.6.7 NOTE.” Staff is unable to locate “LCO 3.6.7 NOTE.” The same issue is present for U2 (CTS SR 4.6.6.2). Please explain.

Volume 13 – Section 3.8 (ADAMS Accession No. ML21265A298)

1. On pages 9 and 54/540 – Proposed Action F appears to be a BSI, it would allow an indefinite time to be in MODE 3 and that does not appear to be the CTS requirement dictated by CTS 3.8.1 Action f, or NUREG-1432 Action G.
2. On page 33/540 – DOC M05 does not explain the proposed non-adoption of NOTE 2 for SR 3.8.1.13 from NUREG-1432. Please provide a complete explanation of the justification for non-adoption of NOTE 2 for SR 3.8.1.13 from NUREG-1432

Volume 16 – Section 5.5 (ADAMS Accession No. ML21265A301)

1. In the markup of the CTS, the licensee indicates on page 5 of 296 that its CTS 6.1 is ITS 5.2, when in fact it is ITS 5.1. Please correct.
2. On page 17 of 296, licensee indicates that language added per ITS for CTS 6.2.1.d. The language added based on the ITS is missing the term “organizational.” However, it is included in the ITS markup. Please correct.
3. In the Insert 6 for the ITS on page 180 of 296 for St. Lucie 2, licensee indicates “less than or equal to 8.5” instead of “less than,” which is what their CTS indicates for the SBVS Delta P. See page 111 of 296 for CTS. Please correct.

SUBJECT: ST. LUCIE PLANT, UNIT NOS. 1 AND 2 – SUPPLEMENTAL INFORMATION
 NEEDED FOR ACCEPTANCE OF LICENSING AMENDMENT REQUEST
 CONCERNING TECHNICAL SPECIFICATION CONVERSION TO
 NUREG-1432, REVISION 5 (EPID L-2021-LLI-0000) DATED DECEMBER 21,
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ADAMS Accession No. ML21350A426

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