L-2022-014
10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D C 20555-0001

RE: St. Lucie Nuclear Plant, Units 1 and 2
Docket Nos. 50-335 and 50-389
Renewed Facility Operating Licenses DPR-67 and NPF-16

Supplement to License Amendment to Allow Risk Informed Completion Times (RICT) for the 120-Volt AC Instrument Bus Requirements

References:

1. Florida Power & Light Company letter L-2020-164, License Amendment to Allow Risk Informed Completion Times (RICT) for the 120-Volt AC Instrument Bus Requirements, December 21, 2020 (ADAMS Accession No. ML20356A162)

2. Response to Request for Additional Information for St. Lucie License Amendment Request to Allow Risk Informed Completion Times (RICT) for the 120-Volt AC Instrument Bus Requirements, May 12, 2021 (ADAMS Accession No. ML21133A002)

In Reference 1, Florida Power & Light Company (FPL) requested amendments to Renewed Facility Operating License Nos. DPR-67 and NPF-16 for St. Lucie Nuclear Plant Units 1 and 2 (St. Lucie), respectively. The proposed license amendments would revise the St. Lucie Operating Licenses (OL) and Technical Specifications (TS) to permit the application of risk-informed completion times (RICT) for the 120-Volt AC Instrument Bus requirements, consistent with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times RITSTF Initiative 4b".

In Reference 2, FPL provided additional information the NRC determined was necessary to complete their review.

Subsequent to the Reference 2 submittal, an inadvertent error was identified in the St. Lucie Unit 1 TS and TS Bases markup pages provided in Reference 1. Specifically, the proposed ACTION b) of TS 3/4.8.2 would have allowed 30 hours in lieu of 6 hours, as intended, for St. Lucie Unit 1 to reach HOT SHUTDOWN in the event a faulted inverter could not be restored to operability within the allotted Completion Time.

The enclosure to this letter provides the corrected TS 3/4.8.2 and TS Bases 3/4.8 markup pages for St. Lucie Unit 1. The pages supersede the corresponding TS 3/4.8.2 and TS Bases 3/4.8 marked up pages for St. Lucie Unit 1 provided in Reference 1. No other changes are proposed to the St. Lucie Unit 1 TS markup and TS Bases markup pages provided in Reference 1.

The supplements included in this letter provide additional information which clarifies the application, do not expand the scope of the application as originally noticed, and should not change the NRC staff's original proposed no significant hazards consideration determination as published in the Federal Register.

This letter contains no new regulatory commitments.

Should you have any questions regarding this submittal, please contact Mr. Wyatt Godes, St. Lucie Licensing Manager, at (772) 467-7435.

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

Executed on Jan 13, 2022.

Sincerely,

Daniel D. DeBoer
Site Vice President, St. Lucie Nuclear Plant
Florida Power & Light

Enclosure

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, St. Lucie Nuclear Plant, Units 1 and 2
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant, Units 1 and 2
Ms. Cindy Becker, Florida Department of Health

ENCLOSURE

ST. LUCIE UNIT 1
TECHNICAL SPECIFICATION 3/4.8.2 PAGES (MARKUP)
AND TECHNICAL SPECIFICATION BASES 3/4.8 PAGES (MARKUP)

(5 pages follow)

ELECTRICAL POWER SYSTEMS

3/4.8.2 ONSITE POWER DISTRIBUTION SYSTEMS

A.C. DISTRIBUTION - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.2.1 The following A.C. electrical busses shall be OPERABLE and energized from sources of power other than the diesel generator sets:

4160	volt Emergency Bus	1A3
4160	volt Emergency Bus	1B3
480	volt Emergency Bus	1A2
480	volt Emergency Bus	1B2
480	volt Emergency MCC Busses	1A5, 1A6, 1A7
480	volt Emergency MCC Busses	1B5, 1B6, 1B7
120	volt A.C. Instrument Bus	1MA
120	volt A.C. Instrument Bus	1MB
120	volt A.C. Instrument Bus	1MC
120	volt A.C. Instrument Bus	1MD

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

> **NOTE**
>
> Enter applicable ACTIONS of LCO 3.8.2.3, “D.C. Distribution - Operating,” for DC trains made inoperable by inoperable AC distribution system.

Add "a."

With less than the above complement of A.C. emergency busses OPERABLE, restore the inoperable bus to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Add "b." See INSERT

SURVEILLANCE REQUIREMENTS

4.8.2.1 The specified A.C. busses shall be determined OPERABLE and energized from A.C. sources other than the diesel generators in accordance with the Surveillance Frequency Control Program by verifying indicated power availability.

INSERT

b. With one A.C. Instrument Bus either not energized from its associated inverter, or with the inverter not connected to its associated D.C. Bus: (1) re-energize the A.C. Instrument Bus within 2 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 and (2) re-energize the A.C. Instrument Bus from its associated inverter connected to its associated D.C. Bus within 24 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 HOT SHUTDOWN within the following 6 hours. LCO 3.0.4.a is not applicable when entering HOT SHUTDOWN.

FPL	ST. LUCIE UNIT 1 TECHNICAL SPECIFICATIONS BASES ATTACHMENT 10 OF ADM-25.04 SAFETY RELATED	Section No. 3/4.8 Attachment No. 10 Current Revision No. ~~9~~

Title:

ELECTRICAL POWER SYSTEMS

Responsible Department: **Licensing**

REVISION SUMMARY:

Revision 9 - Incorporated PCR 2316140 to allow the performance of selected EDG surveillance requirements during power operation and by relocating to licensee control. (Author: N. Davidson)

Revision 8 - Incorporated PCR 2290704 to include the Risk Informed Completion Time (RICT) Program. (Author: K. Frehafer)
AND
Incorporated PCR 2324261 to include the LCO 3.0.6 Program. (Author: K. Frehafer)

Revision 7 - Incorporated PCR 2087288 based on NRC approval of TSTF-422, Change in Technical Specifications End States (CE NPSD-1186). (Author: N. Davidson)

Revision 6 - Incorporated PCR 2053666 based on NRC approval of the TSTF-425 LAR that implements the Surveillance Frequency control Program. (Author: K. Frehafer)

Revision 5 - Incorporated PCR 1948779 to modify TS requirements for Mode change limitations in LCO 3.0.4 and SR 4.0.4. (Author: N. Elmore)

Revision 4 - Incorporated PCR 1880845 to update DC battery surveillance TS changes required. (Author: K. Frehafer)

Revision 3 – Incorporated PCR 09-2643 to update EDG fuel oil testing ASTM standards. (Author: K.W. Frehafer)

Revision	Approved By	Approval Date
0	R.G. West	08/30/01
9	M. Jones	09/18/18

UNIT #	UNIT 1
DATE	
DOCT	PROCEDURE
DOCN	Section 3/4.8
SYS	
STATUS	COMPLETED
REV	9
# OF PGS	

3/4.8 ELECTRICAL POWER SYSTEMS (continued)

BASES (continued)

Particulate concentrations should be determined in accordance with ASTM D6217 or ASTM D2276. This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l. It is acceptable to obtain a field sample for subsequent laboratory testing in lieu of field testing.

The Frequency of this test takes into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change significantly between Frequency intervals.

ASTM Standards: D4057; D975 and D975 Table 1; D1298; D4176; D2709; D2622; D6217; D5453; D3120; D2276. ASTM Standard "year" designations are located in Chemistry Procedures COP-05.10 and COP-07.16.

This concludes the TS Bases discussion for SR 4.8.1.1.2.c.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977, Regulatory Guide 1.137, "Fuel Oil Systems for Standby Diesel Generators," Revision 1, October 1979, Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," dated July 2, 1984, and NRC staff positions reflected in Amendment No. 48 to Facility Operating License NPF-7 for North Anna Unit 2, dated April 25, 1985; as modified by Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993, and Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," dated May 31, 1994. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

INSERT from next page

Unit 1 TS Bases INSERT

Specification 3.8.2.1, ACTION b, specifies requirements for one A.C. Instrument Bus either not energized from its associated inverter, or with the inverter not connected to its associated D.C. Bus. ACTION b(1) establishes a 2-hour Completion Time to re-energize the AC instrument bus within two hours. Alternatively, a Completion Time can be in accordance with the Risk Informed Completion Time Program. ACTION b(2) establishes a 24-hour Completion Time to re-energize the A.C. Instrument Bus from its associated inverter connected to its associated D.C. Bus. Alternatively, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program. If either Completion Times cannot be met, the unit must be placed in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. LCO 3.0.4.a is not applicable when entering HOT SHUTDOWN.