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

November 2, 1999

J. A. Stall, Site Vice President
St. Lucie Nuclear Plant
6351 South Ocean Drive
Jensen Beach, Florida 34957

SUBJECT: ST. LUCIE, UNIT 2 - AMENDMENT REQUEST REGARDING SAFETY INJECTION TANK AND SHUTDOWN COOLING SYSTEM ISOLATION INTERLOCK SURVEILLANCES (TAC NO. MA5619)

Dear Mr. Stall:

The U.S. Nuclear Regulatory Commission has reviewed your request for the subject technical specification (TS) amendment for the St. Lucie Plant, Unit No. 2, dated May 24, 1999, and concluded that your historical interpretations of TS requirements are correct and that your amendment request is unnecessary. The amendment request consisted of various changes to the TSs surveillance requirements for the safety injection tank (SIT) and shutdown cooling (SDC) system isolation valves.

In your application, Florida Power and Light (FPL) specifically requested clarifications to what was called "nonconservative wording" for TS 3/4.5.1, "Safety Injection Tanks," Surveillance Requirement (SR) 4.5.1.1.d.1 for the SIT isolation function and TS 3/4.5.2, "ECCS Subsystems - Tavg Greater Than or Equal to 325°F," SR 4.5.2.e.1 for the SDC system isolation function.

Your amendment request stated that current plant procedures test the automatic opening of the SIT isolation valves and closing of the SDC system isolation valves at 500 psia. Your letter expressed FPL's concern that the requirement for verifying the isolation function of these valves at 515 psia conflicts with the practice of testing these valves' operation at 500 psia.

The staff believes that FPL has, in the past, correctly interpreted the St. Lucie, Unit 2, TS, and that the unit has historically been in compliance with its TS by testing at a more conservative pressure than required by the TS. SRs, as defined in 10 CFR 50.36, are "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." Further explanation of the use of SRs can be found in NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants." SR 3.0.1, in the Standard TS for Combustion Engineering Plants states that SRs shall be met during the MODES or other specified conditions in the applicability for individual limiting conditions for operation (LCOs), unless otherwise stated in the SR. Failure to meet an SR, whether such failure is experienced during or between performances of the surveillance, shall be failure to meet the LCO. The acceptance criteria for meeting the SRs are generally contained within the SRs themselves. The SRs define *what* function is required to be demonstrated operable, not *how* that function is required to be tested. In the case of the two SRs in question, the SRs define the required operability range for the feature being tested.

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The operability of these features is required to support the operability of the overall system or component covered by the LCO, i.e., the operability of these features is required to meet the LCO. If at any time the licensee discovered that the isolation feature in question was not operable in the range defined by the SR, then that LCO would not be met.

The practice of testing the functionality of these valves at 500 psia means that FPL actually tests these isolation features at a more conservative pressure than required to meet the SR and the LCO. There is no reason to conclude that an isolation feature that is working at 500 psia would not work at 515 psia or higher. There is every reason to believe that it would work and we accept that a feature tested at a more conservative setpoint has been demonstrated as being operable *at and above* the setpoint. It is our conclusion that your staff has been operating the St. Lucie, Unit 2, SIT and SDC systems in compliance with the TSs and in accordance with your updated final safety evaluation report and design bases. Therefore, your amendment request is unnecessary.

Sincerely,

William C. Gleaves, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-389

cc: See next page

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In the case of the two SRs in question, the SRs define the required operability range for the feature being tested. The operability of these features is required to support the operability of the overall system or component covered by the LCO, i.e., the operability of these features is required to meet the LCO. If at any time the licensee discovered that the isolation feature in question was not operable in the range defined by the SR, then that LCO would not be met.

The practice of testing the functionality of these valves at 500 psia, means that FPL actually tests these isolation features at a more conservative pressure than required to meet the SR and the LCO. There is no reason to conclude that an isolation feature that is working at 500 psia would not work at 515 psia or higher. There is every reason to believe that it would work and we accept that a feature tested at a more conservative setpoint has been demonstrated as being operable *at and above* the setpoint. It is our conclusion that your staff has been operating the St. Lucie, Unit 2, SIT and SDC systems in compliance with the TSs and in accordance with your updated final safety evaluation report and design bases, therefore, your amendment request is unnecessary.

Sincerely,

Original signed by:

William C. Gleaves, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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