



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 7, 2000

Mr. T. F. Plunkett  
President - Nuclear Division  
Florida Power and Light Company  
P.O. Box 14000  
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE UNIT 1 - ISSUANCE OF AMENDMENT REGARDING  
TECHNICAL SPECIFICATION CHANGES IN ACCORDANCE WITH  
GENERIC LETTER 99-02 (TAC NO. MA9572)

Dear Mr. Plunkett:

The Commission has issued the enclosed Amendment No. 167 to Facility Operating License No. DPR-67 for the St. Lucie Plant, Unit No. 1. This amendment consists of changes to the Technical Specifications (TS) in response to your application dated July 19, 2000.

This amendment revises the TS surveillance testing of the safety-related ventilation system charcoal to meet the actions requested in Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999. Systems impacted include the control room emergency ventilation system, the shield building ventilation system, the emergency core cooling system area ventilation system, and the fuel pool ventilation system - fuel storage.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Kahtan N. Jabbour, Senior Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-335

Enclosures:

1. Amendment No. 167 to DPR-67
2. Safety Evaluation

cc w/encls: See next page

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 /RA/

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

FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 167  
License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated July 19, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

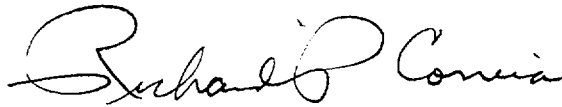
2. Accordingly, Facility Operating License No. NPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.2 to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 167 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard P. Correia, Chief, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: **December 7, 2000**

ATTACHMENT TO LICENSE AMENDMENT NO. 167

TO FACILITY OPERATING LICENSE NO. DPR-67

DOCKET NO. 50-335

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

<u>Remove Pages</u>	<u>Insert Pages</u>
3/4 6-28	3/4 6-28
3/4 7-21	3/4 7-21
3/4 7-22	3/4 7-22
3/4 7-25	3/4 7-25
3/4 9-13	3/4 9-13

## CONTAINMENT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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3. Verifying that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 70% RH). The carbon samples not obtained from test canisters shall be prepared by either:
    - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
    - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.
  4. Verifying a system flow rate of 6000 cfm  $\pm 10\%$  during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of system operation by either:
1. Verifying that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 70% RH); or
  2. Verifying that a laboratory analysis of at least two carbon samples demonstrate a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989 (30°C, 70% RH) and the samples are prepared by either:
    - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
    - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS

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4.7.7.1 The control room emergency ventilation system shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the control room air temperature is  $\leq 120^{\circ}\text{F}$ .
- b. At least once per 31 days by:
  1. Initiating flow through the HEPA filter and charcoal adsorber train and verifying that each booster fan operates for at least 15 minutes.
  2. Starting (unless already operating) each air conditioning unit and verifying that it operates for at least 8 hours.
- c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housing, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
  1. Verifying that the charcoal adsorbers remove  $\geq 99\%$  of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of  $2000 \text{ cfm} \pm 10\%$ .
  2. Verifying that the HEPA filter banks remove  $\geq 99\%$  of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of  $2000 \text{ cfm} \pm 10\%$ .
  3. Verifying that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 70% RH). The carbon samples not obtained from test canisters shall be prepared by either:
    - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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- b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.
- 4. Verifying a system flow rate of 2000 cfm  $\pm$  10% during system operation when tested in accordance with ANSI N510-1975.
- d. After every 720 hours of system operation by either:
  - 1. Verifying that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of  $\geq$  97.5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 70% RH); or
  - 2. Verifying that a laboratory analysis of at least two carbon samples demonstrate a removal efficiency of  $\geq$  97.5% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989 (30°C, 70% RH) and the samples are prepared by either:
    - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
    - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also:

- a) Verifying that the charcoal adsorbers remove  $\geq$  99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 2000 cfm  $\pm$  10%, and
- b) Verifying that the HEPA filter banks remove  $\geq$  99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 2000 cfm  $\pm$  10%.



## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (continued)

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3. Verifying that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 70% RH). The carbon samples not obtained from test canisters shall be prepared by either:
    - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
    - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.
  4. Verifying a system flow rate of 30,000 cfm  $\pm 10\%$  during system operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of system operation by either:
1. Verifying that a laboratory analysis of a carbon sample obtained from a test canister demonstrates a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 70% RH); or
  2. Verifying that a laboratory analysis of at least two carbon samples demonstrate a removal efficiency of  $\geq 97.5\%$  for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989 (30°C, 70% RH) and the samples are prepared by either:
    - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
    - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

## REFUELING OPERATIONS

### SURVEILLANCE REQUIREMENTS (Continued)

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1. Verifying that the charcoal adsorbers remove  $\geq 99\%$  of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of  $10,350 \text{ cfm} \pm 10\%$ .
2. Verifying that the HEPA filter banks remove  $\geq 99\%$  of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of  $10,350 \text{ cfm} \pm 10\%$ .
3. Verifying that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers demonstrates a removal efficiency of  $\geq 85\%$  for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989 (30°C, 95% RH). The carbon samples not obtained from test canisters shall be prepared by either:
  - a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or
  - b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.
4. Verifying a system flow rate of  $10,350 \text{ cfm} \pm 10\%$  during system operation when tested in accordance with ANSI N510-1975.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 167 TO FACILITY OPERATING LICENSE NO. DPR-67

FLORIDA POWER AND LIGHT COMPANY

ST. LUCIE PLANT, UNIT NO. 1

DOCKET NO. 50-335

1.0 INTRODUCTION

By letter dated November 16, 1999, as revised by letter dated August 1, 2000, Florida Power & Light Company (FPL or the licensee) submitted its response to the actions requested in U.S. Nuclear Regulatory Commission's (NRC) Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999, for St. Lucie Unit 1. By letter dated July 19, 2000, Florida Power & Light Company (FPL or the licensee) requested changes to the Technical Specification (TS) Surveillance Requirements (SRs) for St. Lucie Unit 1. The July 19, 2000, submittal superseded a November 17, 1999, submittal regarding the same subject. The proposed changes would revise the following SRs: 4.6.6.1, "SHIELD BUILDING VENTILATION SYSTEM" (SBVS); 4.7.7.1, "CONTROL ROOM EMERGENCY VENTILATION SYSTEM" (CREVS); 4.7.8.1, "ECCS [EMERGENCY CORE COOLING SYSTEM] AREA VENTILATION SYSTEM"; and 4.9.12, "FUEL POOL VENTILATION SYSTEM - FUEL STORAGE" (FPVS/FS). The revision is needed to meet the actions requested in U.S. Nuclear Regulatory Commission's (NRC) Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999. Specifically, FPL proposes to change the TSs to require testing of charcoal filters in accordance with the protocol set forth in ASTM D3803-1989.

2.0 BACKGROUND

Safety-related air-cleaning units used in the engineered safety features ventilation systems of nuclear power plants reduce the potential onsite and offsite consequences of a radiological accident by filtering radioiodine. Analyses of design basis accidents assume particular safety related charcoal adsorption efficiencies when calculating offsite and control room operator doses. To ensure that the charcoal filters used in these systems will perform in a manner that is consistent with the licensing basis of a facility, licensees have requirements in their TSs to periodically perform laboratory tests (in accordance with a test standard) of charcoal samples taken from these ventilation systems.

GL 99-02 alerted licensees that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with their current licensing basis as it relates to the dose limits of General Design Criterion 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR) and Subpart A of 10 CFR Part 100. GL 99-02 requested that all licensees determine whether their TSs reference ASTM D3803-1989 for charcoal filter laboratory testing. Licensees whose TSs do not reference ASTM D3803-1989 were requested to either amend their TSs to reference ASTM D3803-1989 or propose an alternative test protocol.

ENCLOSURE

### 3.0 EVALUATION

#### 3.1 Laboratory Charcoal Sample Testing Surveillance Requirements

The current and proposed laboratory charcoal sample testing SRs for St. Lucie Unit 1 SBVS, CREVS, ECCS area ventilation system and FPVS/FS are shown in Table 1 and Table 2, respectively.

The proposed use of ASTM D3803-1989 is acceptable because it provides accurate and reproducible test results. The proposed test temperature of 30 °C for all four systems is acceptable because it is consistent with ASTM D3803-1989. The proposed test relative humidity of 95% for FPVS/FS is acceptable because it is consistent with ASTM D3803-1989. The proposed test relative humidity of 70% is acceptable because humidity control is provided by heaters for the SBVS and by control room air conditioners for the CREVS. In addition, humidity control without the addition of heaters for the ECCS area ventilation system was approved by the NRC staff in the acceptance of Amendment No. 39 dated February 28, 1975. This is consistent with the actions requested in GL 99-02.

The credited removal efficiency for radioactive organic iodide is greater than or equal to 95% for the SBVS, CREVS, and ECCS area ventilation system, and greater than or equal to 70% for the FPVS/FS. The proposed test penetrations for methyl iodide for the SBVS, CREVS, and ECCS area ventilation system are 2.5%, and for the FPVS/FS is 15%. The proposed test penetrations were obtained by applying a safety factor of 2 to the values assumed in the accident analysis for each of these systems. These proposed safety factors are acceptable because they ensure that the efficiencies credited in the accident analysis are still valid at the end of the surveillance interval. This is consistent with the minimum safety factor of 2 specified in GL 99-02.

The proposed change to perform laboratory testing using methyl iodide rather than elemental iodine for the FPVS/FS is acceptable because methyl iodide is more difficult for charcoal to adsorb than elemental iodine. This will ensure that the testing will be more conservative than the efficiency credited in the accident analysis. This is consistent with ASTM D3803-1989 and the actions requested in GL 99-02.

The August 23, 1999 errata to GL 99-02 clarified that, if the maximum actual face velocity is greater than 110% of 40 fpm, then the test face velocity should be specified in the TS. The licensee stated in its letter of July 19, 2000, that the charcoal filter systems at St. Lucie Unit 1 have a face velocity of 40 fpm. The proposed testing of the charcoal adsorbers will be performed in accordance with ASTM D3803-1989 which specifies a test face velocity of 40 fpm with appropriate margins. This is acceptable because it ensures that the testing will be consistent with the operation of the ventilation system during accident conditions. Therefore, it is not necessary to specify the face velocity in the proposed TS change. This is consistent with GL 99-02, as clarified by the errata dated August 23, 1999.

#### 3.2 Evaluation Conclusion

On the basis of its evaluation, the staff concludes that the proposed TS changes for St. Lucie Unit 1 satisfy the actions requested in GL 99-02 and are adequate to ensure charcoal absorption efficiencies credited in licensee evaluations of accident doses are maintained throughout the surveillance interval. Therefore, the proposed TS changes summarized in Table 2 are acceptable.

ST. LUCIE PLANT, UNIT 1

TABLE 1 - CURRENT TS REQUIREMENTS											
System Description						Current TS Requirements					
TS Section	System	Bed Thickness (inches)	Actual Charcoal		Credited Efficiency (Organic Iodide)	Test Penetration	Safety Factor	Test Standard	Test Temp (°C)	Test RH (%)	Test Face Velocity (fpm)
			Residence Time (sec)	Face Velocity (fpm)							
4.6.6.1	Shield Building Ventilation System (SBVS)	2	0.25	40	95%	10% for methyl iodide	*	ANSI N510-1975	130	95	40
4.7.7.1	Control Room Emergency Ventilation System (CREVS)	2	0.25	40	95%	10% for methyl iod	*	ANSI N510-1975	130	95	40
4.7.8.1	ECCS Area Ventilation System	2	0.25	40	95%	10% for methyl iodide	*	ANSI N510-1975	130	95	40
4.9.12	Fuel Pool Ventilation System - Fuel Storage (FPVS/FS)	2	0.25	40	70%	30% for elemental iodine	1	ANSI N510-1975	130	95	40

\*There is no safety factor as the licensee is currently testing at an efficiency which is less than that assumed in the existing accident analysis.

ST. LUCIE PLANT, UNIT 1

TABLE 2 - PROPOSED TS REQUIREMENTS											
System Description						Proposed TS Requirements					
Tech Spec Section	System	Bed Thickness (inches)	Actual Charcoal		Credited Efficiency (Organic Iodide)	Test Penetration (methyl iodide)	Safety Factor	Test Standard	Test Temp (°C)	Test RH (%)	Test Face Velocity (fpm)*
			Residence Time (sec)	Face Velocity (fpm)							
4.6.6.1	Shield Building Ventilation System (SBVS)	2	0.25	40	95%	2.5%	2	ASTM D3803-1989	30	70	40
4.7.7.1	Control Room Emergency Ventilation System (CREVS)	2	0.25	40	95%	2.5%	2	ASTM D3803-1989	30	70	40
4.7.8.1	ECCS Area Ventilation System	2	0.25	40	95%	2.5%	2	ASTM D3803-1989	30	70	40
4.9.12	Fuel Pool Ventilation System - Fuel Storage (FPVS/FS)	2	0.25	40	70%	15%	2	ASTM D3803-1989	30	95	40

\* Per ASTM D3803-1989.

#### 4.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. NRC, the State of Florida does not desire notification of issuance of license amendments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (65 FR 48749). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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K. Jabbour

Date: December 7, 2000

Mr. T. F. Plunkett  
Florida Power and Light Company

**ST. LUCIE PLANT**

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