

March 1, 2000

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

SUBJECT: St. LUCIE UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION
REGARDING EXTENSION OF THE ALLOWED OUTAGE TIME FOR THE
EMERGENCY DIESEL GENERATORS (TAC NOS. MA7205 AND MA7206)

Dear Mr. Plunkett:

By letter dated November 17, 1999, Florida Power and Light Company (FPL) proposed technical specification (TS) changes for St. Lucie Units 1 and 2. The proposed changes would revise the 72-hour allowed outage time in TS 3.8.1.1, Action b, to 14 days to restore an inoperable emergency diesel generator set to operable status.

The U.S. Nuclear Regulatory Commission staff has reviewed FPL's submittal and has determined that additional information is needed by the staff before it can complete its review. The enclosed request for additional information (RAI) has been discussed with George Madden of your staff. A target date for your response has been agreed upon to be 60 days from your receipt of this RAI. Should a situation occur that prevents you from meeting the target date, please contact me at (301) 415-1496.

Sincerely,

/RA/

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

Docket Nos. 50-335 and 50-389

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Florida Power and Light Company
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Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

Enclosure: Request for Additional Information

cc w/encl: See next page

REQUEST FOR ADDITIONAL INFORMATION
RELATED TO THE AMENDMENT OF THE TECHNICAL SPECIFICATIONS
FOR THE EMERGENCY DIESEL GENERATORS
ST. LUCIE UNITS 1 AND 2
FLORIDA POWER AND LIGHT COMPANY
DOCKET NOS. 50-335 AND 50-389

1. The staff is concerned over your use of "trigger values" to ensure that the emergency diesel generator (EDG) reliability for St. Lucie Units 1 and 2 remains greater than or equal to the target reliability chosen for your EDGs to meet station blackout (SBO) rule. Please justify your amendment request without relying on the "trigger values."
2. Your staff indicated in a telephone conference on January 19, 2000, that each of the Unit 1 and Unit 2 EDGs is capable of powering its dedicated division of safety loads in addition to the complement of selected Unit 1 or Unit 2 loads necessary to maintain the units in Hot Standby through the duration of the SBO event. Your staff also indicated that procedures are in place to accomplish the above through the SBO crosstie. Please clarify this aspect of the design for Unit 2 in your application. In addition, indicate that the time it takes to establish this connection satisfies the availability requirements of an alternate AC source used for the SBO event.
3. Page 8, Table 4 - Explain the relationship among the early containment failure probability (0.01 or 0.1), core damage frequency (CDF), and large early release frequency (LERF).
4. Pages 6, 7 and 8, Tables 1, 2 and 3 - In Tables 1 and 2, $1.39E-5/\text{yr}$ was referred to as a conditional CDF based on zero EDG unavailability. The same value was referred to as an average baseline CDF in Table 3. Explain.
5. The staff finds that the loss of grid initiating event frequency does not include plant-centered loss of offsite power (LOOP). Does the FPL's risk evaluation include the risk impact of the proposed change due to this plant-centered LOOP initiating event? Explain.
6. Is the crosstie recovery event failure probability (0.1) identical for both units? Explain why the asymmetry in design between the units was not captured.
7. Explain how the recommended Tier 2 restriction is going to be implemented.
8. Explain EOP-99, Appendix G for manual C auxiliary feedwater pump start, and justify the basic event failure probability used for it in your PRA.

ENCLOSURE

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

ST. LUCIE PLANT

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