

## NRR-PMDAPEm Resource

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**From:** Orf, Tracy  
**Sent:** Tuesday, July 26, 2011 10:53 AM  
**To:** Wasik, Chris  
**Cc:** Abbott, Liz  
**Subject:** St. Lucie 2 EPU draft RAIs - Instrumentation & Control (EICB)

Chris,

Please see below.

Thanks,

Trace

**Tracy J. Orf**, Project Manager  
St. Lucie  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
Phone: (301) 415-2788

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EICB-1. Staff needs documentation of the setpoint methodology being used to determine the revised setpoint as well as a sample calculation for review. Since only one limiting safety system setpoint is being changed as a result of the Extended Power Uprate (EPU), the licensee is requested to provide the staff with the setpoint calculation and the methodology. The calculation should clearly state the analytical limit, the limiting trip setpoint, the nominal trip setpoint, total loop uncertainty, the allowable value, as-left tolerance, and as-found tolerance, and the methodology should describe the basis for determining these values.

EICB-2. Please state whether or not the licensee is committed to meeting the guidance of TSTF-493, Rev. 4.

EICB-3. The licensee has stated that it is following the guidance in the September 7, 2005 letter from Patrick Hiland of Nuclear Regulatory Commission (NRC) to Nuclear Energy Institute (NEI) (ML052500004). In this regard please clarify the following:

- (i) The notes do not match the notes in NRC September 7, 2005. Please justify the differences. For example note 1 in the September 7, 2005 letter states:

“If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predefined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.”

The corresponding note, note 6 in the Technical Specifications Table 2.2- 1, Attachment 3 to the licensing amendment request states:

“If the as-found channel setpoint is either outside its predefined as-found acceptance criteria band or is not conservative with respect to the Allowable Value, then the channel shall be declared inoperable and shall be evaluated to verify that it is functioning as required before returning the channel to service.”

- (ii) Part B of the attachment to the September 7, 2005 letter provides guidance for updating the technical specification basis document. The licensee has not addressed all four points in this part of the guidance in the technical specification basis. Please update the technical
- (iii) specification basis document or justify why there is no need to update the technical specification basis.

EICB-4. Please explain whether the field trip setpoint (FTSP) (NRC term for this is Nominal Trip Setpoint or NTSP) is the setpoint that is implemented by your calibration and surveillance procedures and that the as-left tolerance (ALT) and the as-found tolerances (AFT) are determined with respect to the FTSP (NTSP). Also explain how your surveillance and corrective action program (CAP) requirements for the Steam Generator Level Low-Low setpoint deviations and evaluations are based on the FTSP (NTSP) rather than the Trip Setpoint as indicated on Table 2.2-1, page 2-5 of Attachment 3, Technical Specifications Markups and Clean Pages.

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