



October 23, 2014

L-2014-331  
10 CFR 50.90

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Subject: St. Lucie Unit 2  
Docket No. 50-389  
TS Correction for Fourth Ten-Year Inservice  
Inspection Interval License Amendment Request  
Changes to Snubber Surveillance Requirements

References:

1. FPL Letter L-2014-077 dated January 30, 2014, "Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements," ADAMS Accession No. ML14049A284
2. NRC email dated July 3, 2014, "Request for Additional Information Regarding Proposed License Amendment Request Changes to Snubber Surveillance Requirements Florida Power & Light Company (FPL) St. Lucie Unit 2 Docket No. 50-389 (TAC No. MF3470)," ADAMS Accession No. ML14172A149
3. FPL Letter L-2014-227 dated July 21, 2014, "RAI Reply for Fourth Ten-Year Inservice Inspection Interval License Amendment Request Changes to Snubber Surveillance Requirements," ADAMS Accession No. ML14212A395

In Reference 1 Florida Power & Light Company (FPL) submitted a Technical Specification (TS) amendment request that would revise the TS surveillance requirements (SRs) for snubbers. Reference 3 provided FPL's response to the NRC request for additional information in Reference 2.

During review of the proposed TS changes, an administrative oversight was identified within the surveillance requirements invoking the proposed Snubber Testing Program. The corrected TS Markups and TSs supersede those in References 1 and 3 above and are provided in the Attachment.

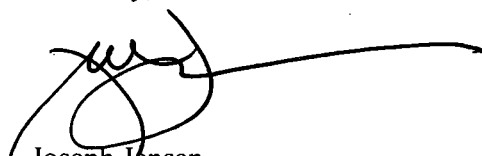
The no significant hazards consideration determination within Reference 1 bounds the scope of these changes.

AD47  
NRR

If you should have any questions, please contact Mr. Ken Frehafer at (772) 467-7748.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Joseph Jensen', with a long horizontal line extending to the right.

Joseph Jensen  
Site Vice President  
St. Lucie Plant

JJ/KWF

Attachment

cc: NRC Region II Administrator  
St. Lucie Plant NRC Senior Resident Inspector

**PLANT SYSTEMS**

**3/4.7.9 SNUBBERS**

**LIMITING CONDITION FOR OPERATION**

3.7.9 All safety-related snubbers shall be OPERABLE.

**APPLICABILITY:** MODES 1, 2, 3 and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

**ACTION:**

4.7.9

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9f. on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

Snubber Testing Program

**SURVEILLANCE REQUIREMENTS**

4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program:

a. Inspection Types

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible or accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 4.7-2 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment.

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**APPLICABILITY:** MODES 1, 2, 3 and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

**ACTION:**

With one or more safety related snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9 on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

**SURVEILLANCE REQUIREMENTS**

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4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program.

a. **Exemption From Visual Inspection or Functional Tests**

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubber for the applicable design conditions at either the completion of their fabrication or at a subsequent date.