

St. Lucie Unit 1 and Unit 2  
Docket Nos. 50-335 and 50-389  
Proposed License Amendments  
License Conditions Update and TS Clarification

ATTACHMENT 3 to FPL Letter L-98-211

**ST. LUCIE UNIT 1 MARKED-UP TECHNICAL SPECIFICATION PAGES**

Page 3/4 5-5

Page 3/4 7-20

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PDR ADOCK 05000335  
P PDR

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

e. At least once per 18 months, during shutdown, by:

1. Verifying that each automatic valve in the flow path actuates to its correct position on a Safety Injection Actuation Signal.
2. Verifying that each of the following pumps start automatically upon receipt of a Safety Injection Actuation Signal;
  - a. High-Pressure Safety Injection Pump.
  - b. Low-Pressure Safety Injection Pump.

3. ~~Verifying on a Sump Recirculation Actuation Test Signal, the containment sump isolation valves open and the recirculation valve to the refueling water tank closed.~~

f. By verifying that each of the following pumps develops the specified total developed head on recirculation flow when tested pursuant to the Inservice Testing Program.

1. High-Pressure Safety Injection pumps: greater than or equal to 2571 ft.
2. Low-Pressure Safety Injection pumps: greater than or equal to 350 ft.

Verifying that upon receipt of an actual or simulated Sump Recirculation Actuation Signal: each low-pressure safety injection pump stops, each containment sump isolation valve opens, each refueling water tank outlet valve closes, and each safety injection system recirculation valve to the refueling water tank closes.



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PLANT SYSTEMS

3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.7.1 The control room emergency ventilation system shall be OPERABLE with:

- a. Two booster fans,
- b. Two isolation valves in each outside air intake duct,
- c. Two isolation valves in the toilet area air exhaust duct,
- d. One filter train, ~~and~~
- e. At least two air conditioning units, ~~and~~
- f. Two isolation valves in the kitchen area exhaust duct.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one booster fan inoperable, restore the inoperable fan to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one isolation valve per air duct inoperable, operation may continue provided the other isolation valve in the same duct is maintained closed; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the filter train inoperable, restore the filter train to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With only one air conditioning unit OPERABLE, restore at least two air conditioning units to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

St. Lucie Unit 1 and Unit 2  
Docket Nos. 50-335 and 50-389  
Proposed License Amendments  
License Conditions Update and TS Clarification

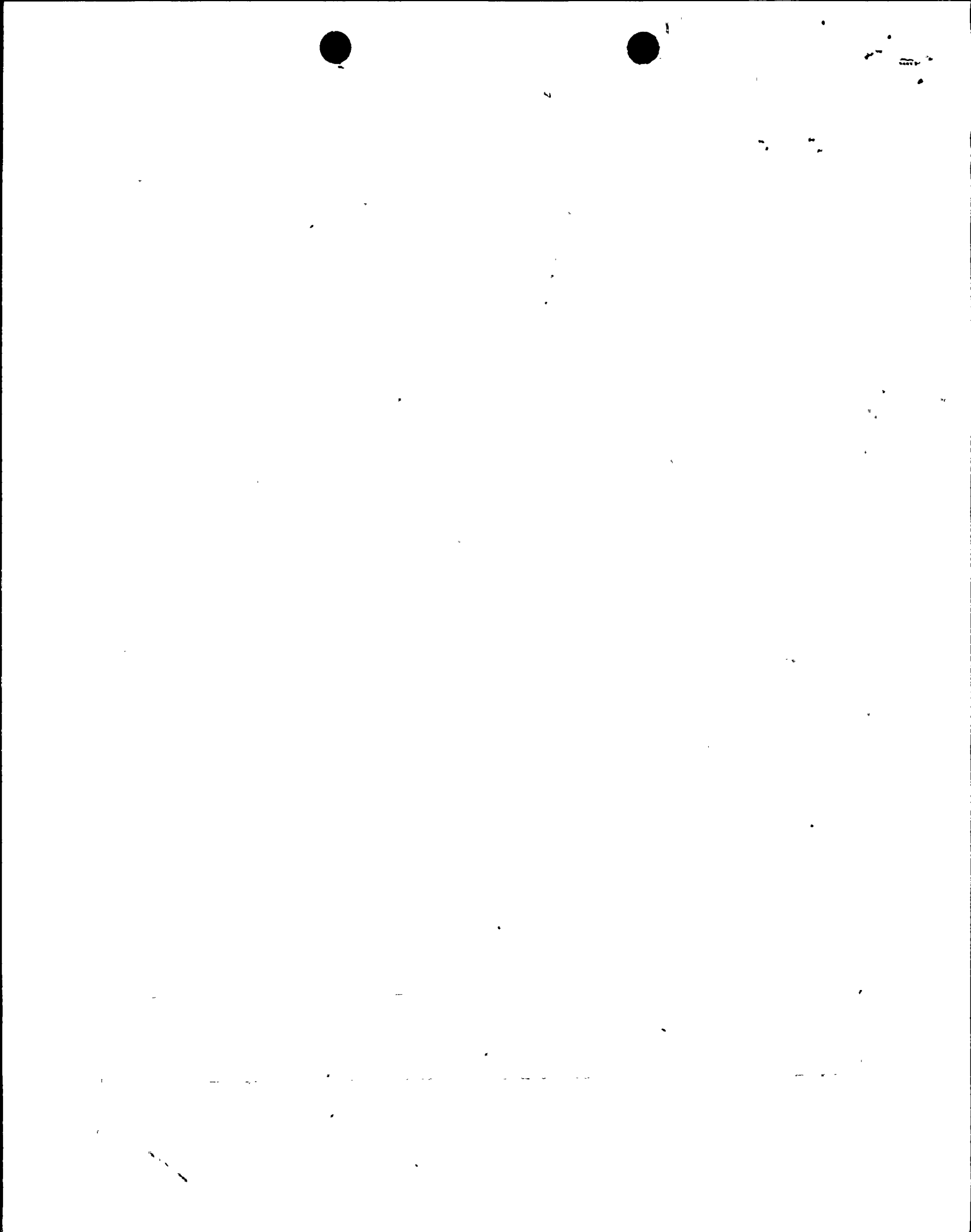
ATTACHMENT 4 to FPL Letter L-98-211

**ST. LUCIE UNIT 2 MARKED-UP TECHNICAL SPECIFICATION PAGE**

Page 3/4 5-5

2. A visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or corrosion.
  3. Verifying that a minimum total of 173 cubic feet of solid granular trisodium phosphate dodecahydrate (TSP) is contained within the TSP storage baskets.
  4. Verifying that when a representative sample of  $70.5 \pm 0.5$  grams of TSP from a TSP storage basket is submerged, without agitation, in  $10.0 \pm 0.1$  gallons of  $120 \pm 10^\circ\text{F}$  borated water from the RWT, the pH of the mixed solution is raised to greater than or equal to 7 within 4 hours.
- f. At least once per 18 months, during shutdown, by:
1. Verifying that each automatic valve in the flow path actuates to its correct position on SIAS and/or RAS test signals.
  2. Verifying that each of the following pumps start automatically upon receipt of a Safety Injection Actuation Test Signal:
    - a. High-Pressure Safety Injection pump.
    - b. Low-Pressure Safety Injection pump.
  3. ~~Verifying that on a Sump Recirculation Actuation Test Signal, the containment sump isolation valves open and the recirculation valve to the refueling water tank closes.~~
- g. By verifying that each of the following pumps develops the specified total developed head on recirculation flow when tested pursuant to the Inservice Testing Program:
1. High-Pressure Safety Injection pumps: greater than or equal to 2854 ft.
  2. Low-Pressure Safety Injection pump: greater than or equal to 374 ft.
- h. By verifying the correct position of each electrical and/or mechanical position stop for the following ECCS throttle valves:
1. During valve stroking operation or following maintenance on the valve and prior to declaring the valve OPERABLE when the ECCS subsystems are required to be OPERABLE.

Verifying that upon receipt of an actual or simulated Sump Recirculation Actuation Signal: each low-pressure safety injection pump stops, each containment sump isolation valve opens, each refueling water tank outlet valve closes, and each safety injection system recirculation valve to the refueling water tank closes.



50-335  
3/27/2000

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From: Elaine Walker

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ID: 003693718

Subject:

St. Lucie Plant, Units 1 and 2, RE: completion of licensing action for generic letter 98-02 , "loss of reactor coolant inventory and associated potential for loss of emergency mitigation function while in a shutdown condition"

Body:

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DF01 - Direct Flow Distribution: 50 Docket (PDR Avail)

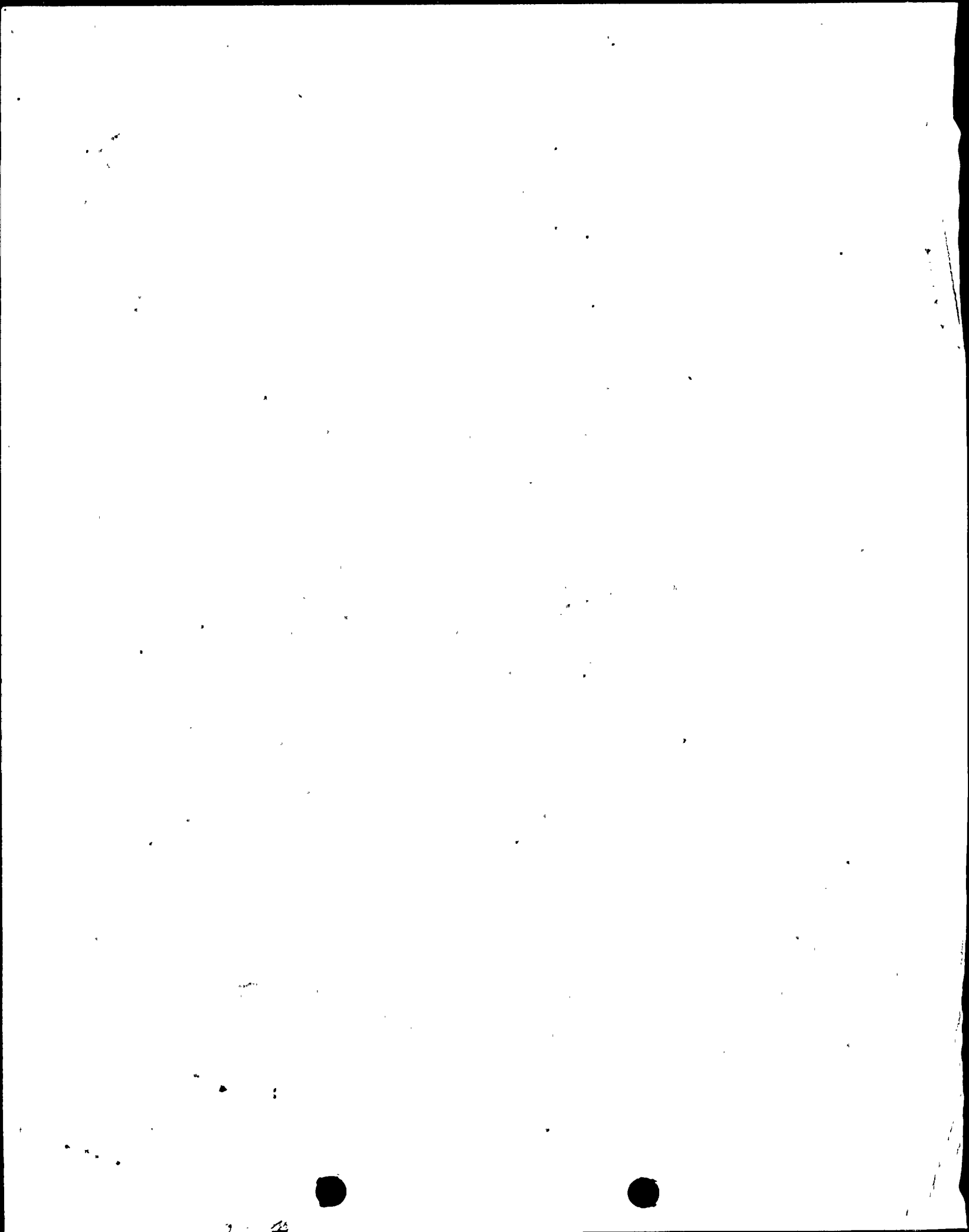
Docket: 05000335

Docket: 05000389

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 27, 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 PLANT, UNITS 1 AND 2, RE: COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-02, "LOSS OF REACTOR COOLANT INVENTORY AND ASSOCIATED POTENTIAL FOR LOSS OF EMERGENCY MITIGATION FUNCTION WHILE IN A SHUTDOWN CONDITION" (TAC NOS. MA4808 AND MA4809)**

Dear Mr. Plunkett:

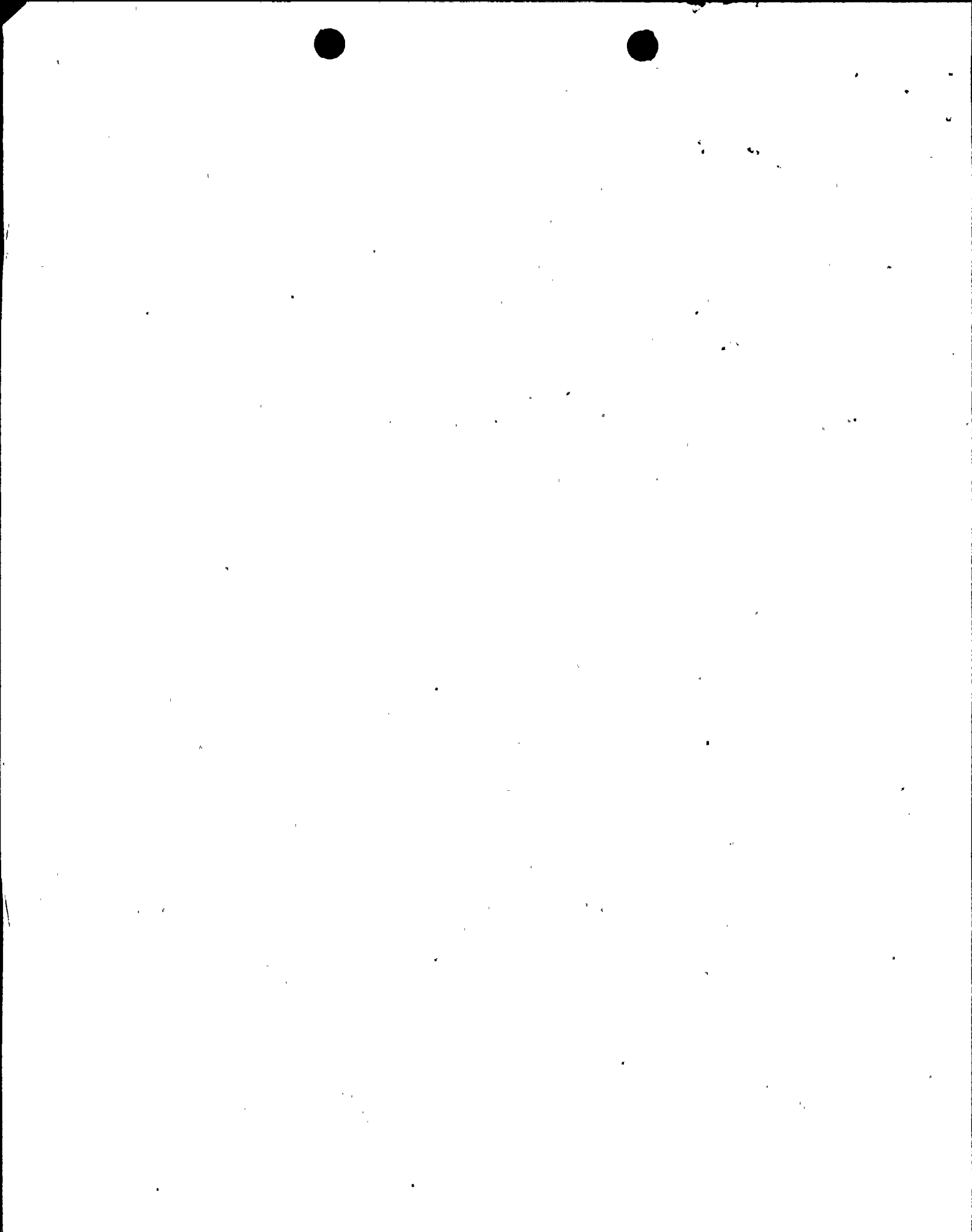
On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02, to all holders of operating licenses for Pressurized Water Reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to drain down the reactor coolant system (RCS) to the refueling water storage tank and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2), if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, you provided a letter dated November 22, 1998, for St. Lucie Plant, Units 1 and 2. The submittal indicated that both Units 1 and 2, were vulnerable to the type of incident which occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02), was being kept in a retrievable licensee system that the NRC can verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated December 13, 1999, the Region II NRC staff issued NRC Inspection Report No. 50-335/99-07; 50-389/99-07. The subject inspection report contained details of the NRC staff's on-site verification of activities which you undertook in response to GL 98-02 for St. Lucie, Units 1 and 2. Specifically, the inspector verified that St. Lucie had effectively

NUCLEAR REGULATORY COMMISSION

DF01



T. F. Plunkett

- 2 -

implemented administrative controls and operating procedures to preclude an inadvertent drain down event as described in GL 98-02. Operator Training Lesson Plan 0802208, Outage Tasks and Outage Related Events, was revised to include a review of GL 98-02 and the drain down flow paths that had been identified for each unit. Training was provided to the operators using the revised lesson plan to understand the susceptible flow paths, and the administrative and operational controls in place to minimize the potential for human factor contributors to the initiation of a drain down event. The above measures were found by the inspector to be appropriate.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for St. Lucie, Units 1 and 2; therefore, we consider GL 98-02 to be closed for St. Lucie, Units 1 and 2.

Sincerely,



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

Docket Nos. 50-335 and 50-389

cc: See next page



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

ST. LUCIE PLANT

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Account # NL003693718  
Date NRC-056

T. F. Plunkett

- 2 -

March 27, 2000

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The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for St. Lucie, Units 1 and 2; therefore, we consider GL 98-02 to be closed for St. Lucie, Units 1 and 2.

Sincerely,

/RA/

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

Docket Nos. 50-335 and 50-389

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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).

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Docket: 05000335

Docket: 05000389

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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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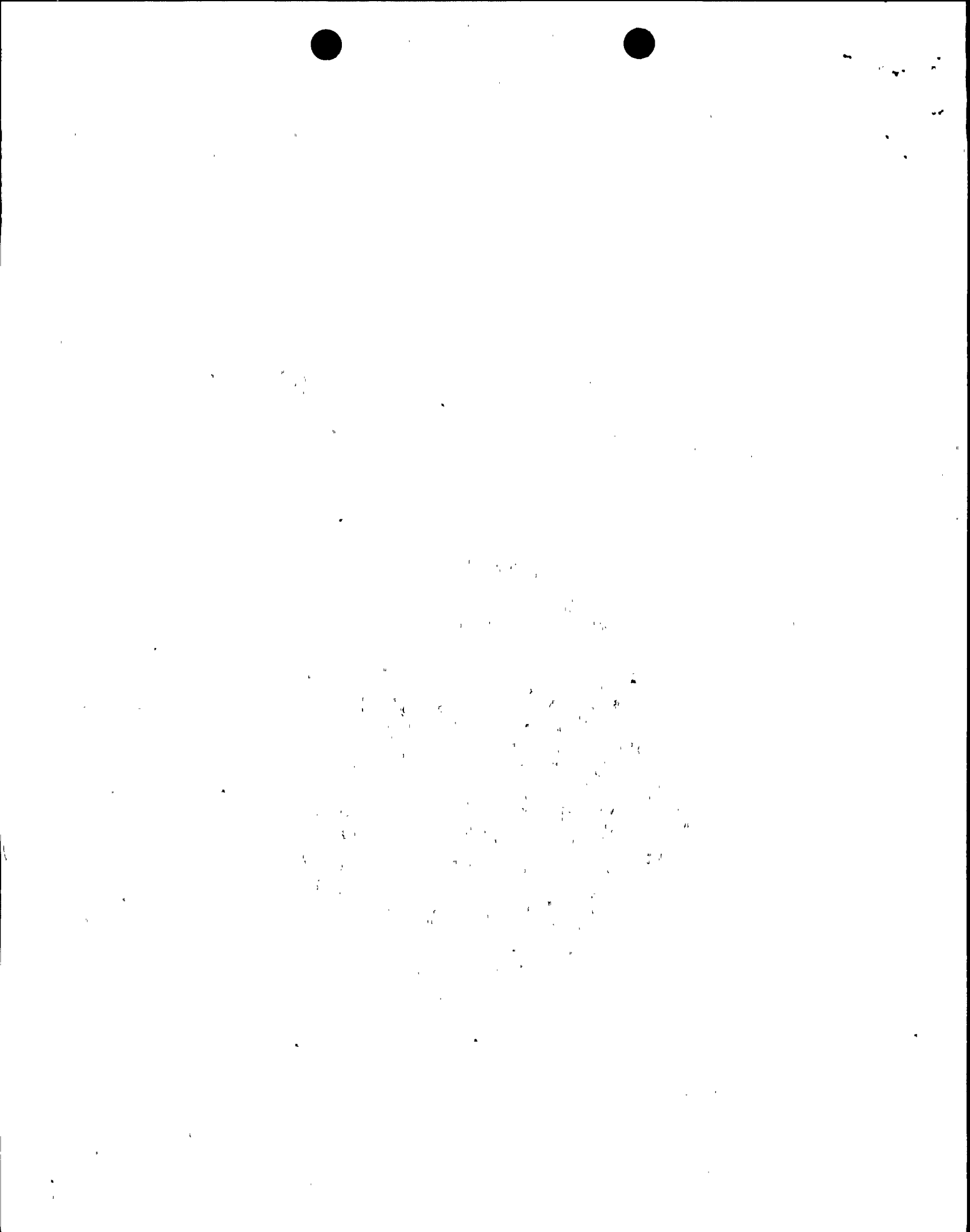
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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:

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Sincerely,

*Kahtan N. Jabbour*

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

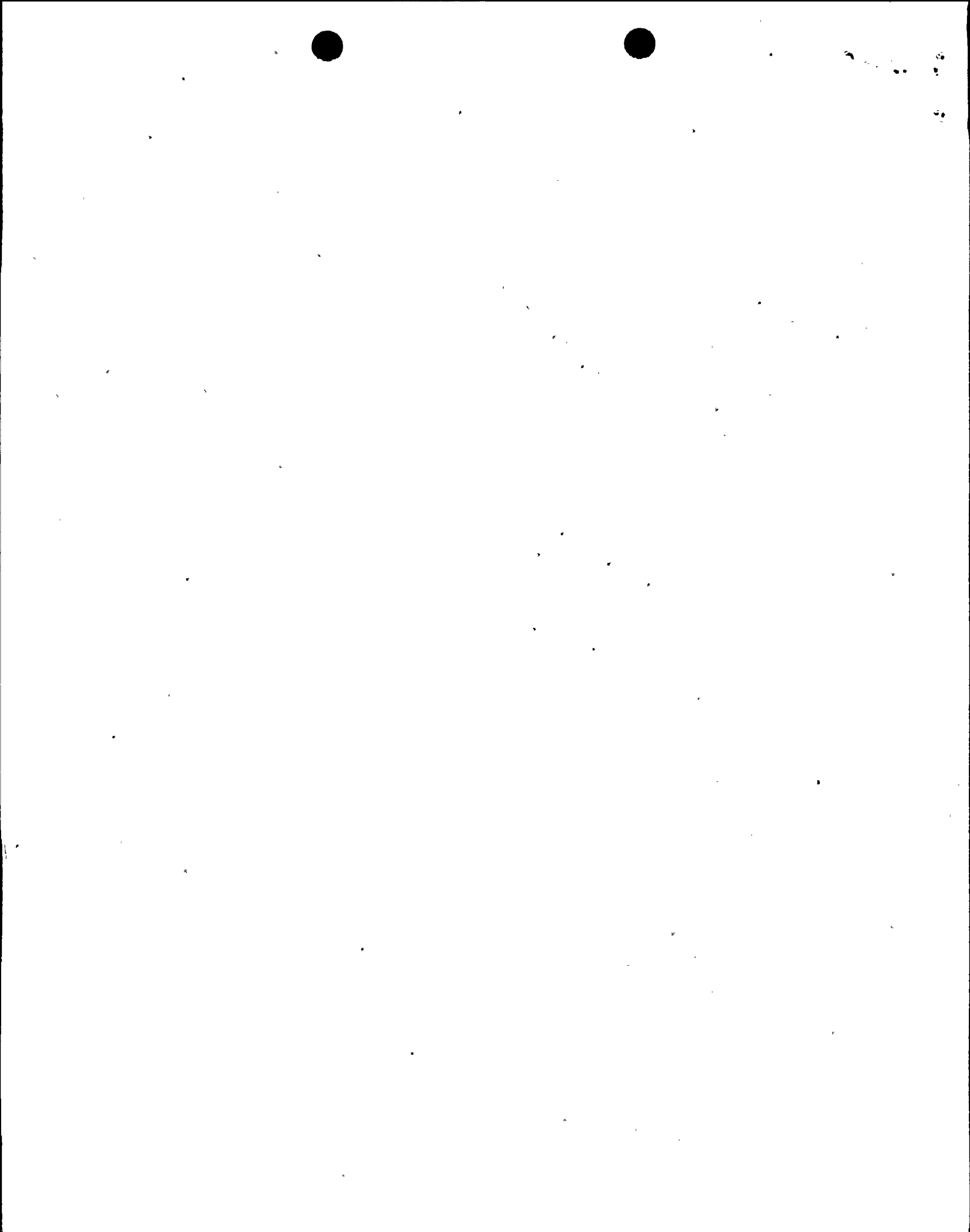
Enclosure: Request for Additional Information

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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

cc:  
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St. Lucie Plant  
U.S. Nuclear Regulatory Commission  
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Subject:

ST. LUCIE PLANT, UNITS 1 AND 2 - PAST AND FUTURE COMPLIANCE WITH 10 CFR 50.7  
1(e)(4) FOR REVISIONS TO THE UFSAR

Body:

PDR ADOCK 05000335 P

Docket: 05000335, Notes: N/A

Docket: 05000389, Notes: N/A

AA3





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

November 10, 1999

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

SUBJECT: ST. LUCIE PLANT, UNITS 1 AND 2 - PAST AND FUTURE COMPLIANCE  
WITH 10 CFR 50.71(e)(4) FOR REVISIONS TO THE UFSAR  
(TAC NOS. M72478 AND M72479)

Dear Mr. Plunkett:

The purpose of this letter is to clarify any misunderstanding of the U.S. Nuclear Regulatory Commission (NRC's) regulations that relate to Title 10 of the *Code of Federal Regulations* (10 CFR), Subsection 50.71(e)(4). Subsection 50.71(e)(4) specifies the schedular requirements whereby licensees are to submit revisions to their Final Safety Analysis Reports (FSARs). It requires revisions to be made, ". . . annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months."

In a 1997 survey of licensees, we found numerous cases of noncompliance with this schedular requirement, in both single- and multi-unit sites. A common example of this noncompliance was a multi-unit site that based their submission schedule for all units on the schedule of one of the units.

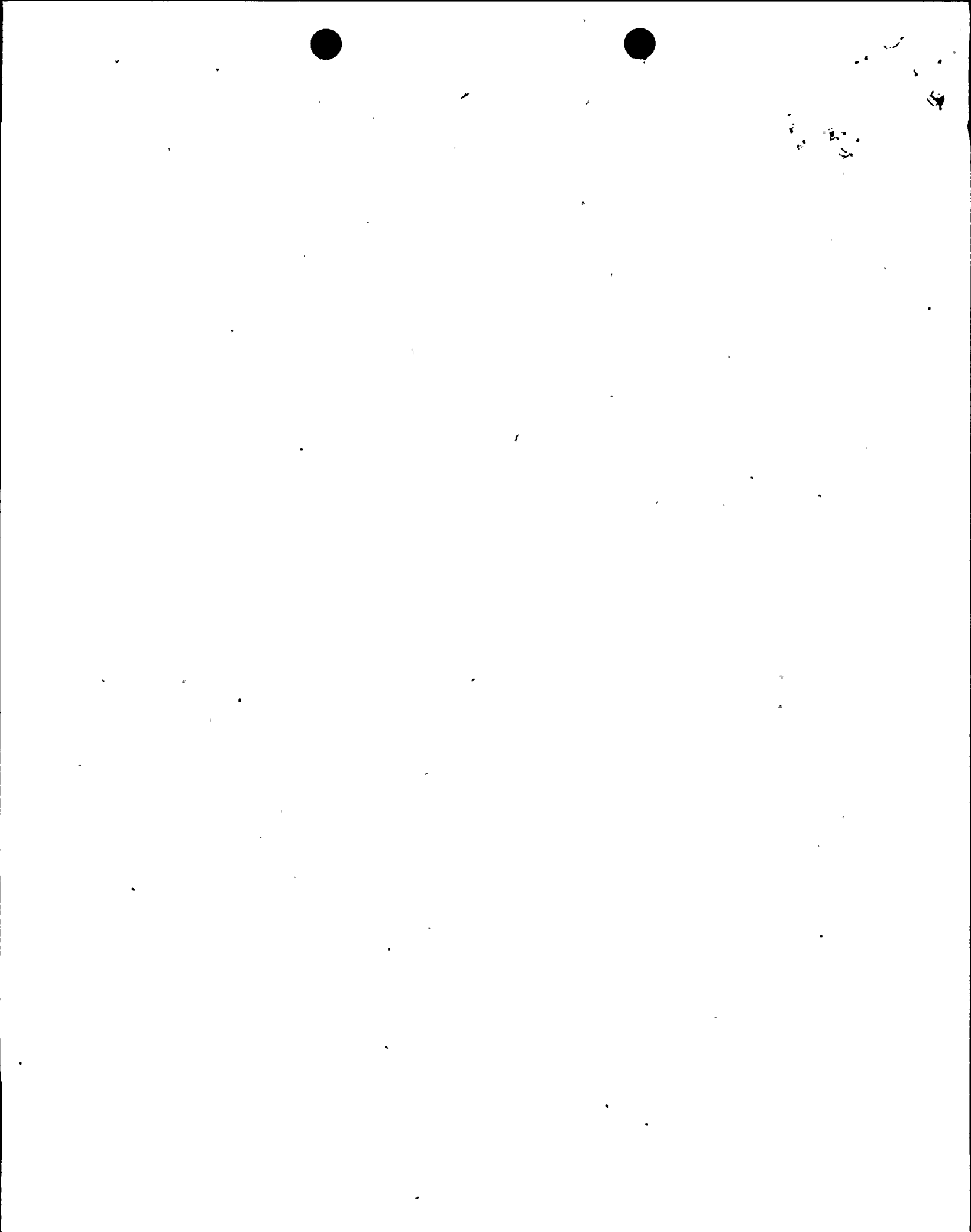
We understand that an NRC letter to Commonwealth Edison Company (ComEd), dated June 15, 1993, may have caused some confusion about the proper interpretation of the regulation. The letter endorsed an alternative submission schedule proposed by ComEd. Neither ComEd's proposed schedule, nor the staff's endorsement, were in compliance with the regulation. Nevertheless, many licensees adopted the staff position expressed in the June 15<sup>th</sup> letter and deviated from the schedular requirements of the regulation. In order to correct the error, the staff recently granted exemptions to the ComEd plants. The transmittal letter to the exemption (D. Skay to O. D. Kingsley, dated July 27, 1999), states, "this [Skay] letter and the enclosed exemptions supersede our letter of June 15, 1993."

We note that you have not requested a schedular exemption to Subsection 50.71(e)(4) for St. Lucie plant. This indicates that you intend to comply with the literal interpretation of the regulation, regardless of how you have interpreted the regulation in the past. We will exercise enforcement discretion, in accordance with Section VII.B.6 of the NRC Enforcement Policy, for past violation(s) of Subsection 50.71(e)(4). In the future, we will enforce the schedular requirements as prescribed, or as modified by an exemption.

0500335 R

993250295

DFo 1



T.F. Plunkett

- 2 -

We do not require a response to this letter. If you have any questions or comments, please call me at 301-415-1479.

Sincerely,

*William C. Gleaves*

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

Docket Nos. 50-335 and 50-389

cc: See next page



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

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T.F. Plunkett

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We do not require a response to this letter. If you have any questions or comments, please call me at 301-415-1479.

Sincerely,

Original signed by K. Jabbour for  
William C. Gleaves, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-335 and 50-389

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