FPL

JUN 0 7 2018

L-2018-111
10 CFR 50.90

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

St. Lucie Nuclear Plant, Units 1 and 2
Docket Nos. 50-335 and 50-389

Subject: Second Supplement to License Amendment Request to Adopt Risk Informed Completion Times TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b"

References:

1. Florida Power & Light Company letter L-2014-242, "Application to Adopt TSTF-505, Revision 1, Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4B," December 5, 2014 (ML14353A016)
2. NRC E-mail "Request for Additional Information - St. Lucie TSTF-505 EICB - MF5372 & MF 5373," March 28, 2016 (ML16089A006)
3. NRC E-mail "Request for Additional Information - St. Lucie TSTF-505 APLA - MF5372 & MF5373," April 13, 2016 (ML16105A456)
4. NRC E-mail "Request for Additional Information - St. Lucie TSTF 505 APLA - MF5372 & MF5373," May 27, 2016 (ML16152A187)
5. Florida Power & Light Company letter L-2016-114, "Response to Request for Additional Information Regarding License Amendment Request to Adopt TSTF-505, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4B'," July 8, 2016 (ML16193A659)
6. Florida Power & Light Company letter L-2016-135, "Second Response to Request for Additional Information Regarding License Amendment Request to Adopt TSTF-505, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4B'," July 22, 2016 (ML16208A061)
7. Florida Power & Light Company letter L-2017-007 "Supplement to License Amendment Request to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b'," February 25, 2017 (ML17058A181)
8. NRC E-mail "Request for Additional Information - St. Lucie RICT LAR - MF5372/5363," October 4, 2017 (ML17277A369)
9. NRC E-mail "Request for Additional Information – St. Lucie RICT LAR I&C – (CACs MF5372/MF5375 EPID L-2014-LLA-0001)," February 1, 2018 (ML18033A014)

10. Florida Power & Light Company letter 2017-006, "Third Response to Request for Additional Information Regarding License Amendment Request to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b'," February 1, 2018 (ML18032A614)
11. Florida Power & Light Company letter L-2018-058, "Fourth Response to Request for Additional Information Regarding License Amendment Request to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b'," March 15, 2018 (ML18074A116)

In Reference 1, as supplemented by References 5, 6, 7, 10, and 11, Florida Power & Light Company (FPL) submitted a license amendment request (LAR) for St. Lucie Units 1 and 2. The proposed amendment would revise the Technical Specifications (TS) to implement TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times RITSTF [Risk Informed TSTF] Initiative 4b."

The review of the LAR found one instance regarding an instrument function for Unit 2 in which the proposed change added a risk-informed completion time to a condition involving a loss of function. Specifically, the loss of voltage function in TS Table 3.3-3, Engineered Safety Features Actuation System Instrumentation, (Functional Unit 6.a(1), 4.16 kV Emergency Bus Undervoltage) consists of two channels per bus and requires two operable channels per bus to trip. The current TS action requires restoring an inoperable channel within 48 hours or placing the channel in the tripped condition, and the LAR proposed adding a risk-informed completion time to this action. However, the condition that less than two channels are operable results in the inability to initiate the loss of voltage trip function. Therefore, this supplement removes the proposed change that added a risk-informed completion time to the action for Functional Unit 6.a(1), 4.16 kV Emergency Bus Undervoltage, in TS Table 3.3-3.

Attachment 1 to this letter contains a markup of the TS for Unit 2, which removes the proposed change. The TS markup supersedes the corresponding markup provided in Reference 7.

This supplement also provides additional information regarding procedures that were mentioned in the letter in Reference 11. Attachment 2 to this letter provides a description of the referenced procedures.

This supplement does not alter the conclusions in Reference 1 that the changes do not involve a significant hazards consideration pursuant to 10 CFR 50.92, and there are no significant environmental impacts associated with the changes.

No new or revised commitments are included in this letter

Should you have any questions regarding this submittal, please contact Mr. Mike Snyder, Licensing Manager, at (772) 467-7036.

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

Executed on JUN 0 7 2018

Sincerely,

Daniel DeBoer
Site Director
Florida Power & Light Company

Attachments

cc: NRC Regional Administrator, Region II
NRC Senior Resident Inspector
NRC Project Manager
Ms. Cindy Becker, Florida Department of Health

Attachment 1

Markup of the Technical Specifications for St. Lucie Unit 2

TABLE 3.3-3 (Continued)

ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
6. LOSS OF POWER (LOV)					
a. (1) 4.16 kV Emergency Bus Undervoltage (Loss of Voltage)	2/Bus	2/Bus	1/Bus	1, 2, 3	17
(2) 480 V Emergency Bus Undervoltage (Loss of Voltage)	3/Bus	2/Bus	2/Bus	1, 2, 3	17
b. (1) 4.16 kV Emergency Bus Undervoltage (Degraded Voltage)	3/Bus	2/Bus	2/Bus	1, 2, 3	17
(2) 480 V Emergency Bus Undervoltage (Degraded Voltage)	3/Bus	2/Bus	2/Bus	1, 2, 3	17
7. AUXILIARY FEEDWATER (AFAS)					
a. Manual (Trip Buttons)	4/SG	2/SG	4/SG	1, 2, 3	15
b. Automatic Actuation Logic	4/SG	2/SG	3/SG	1, 2, 3	15
c. SG Level (2A/2B) – Low	4/SG	2/SG	3/SG	1, 2, 3	20a, 20b, ~~20e~~
8. AUXILIARY FEEDWATER ISOLATION					
a. SG 2A – SG 2B Differential Pressure	4/SG	2/SG	3/SG	1, 2, 3	20a, 20b, ~~20e~~
b. Feedwater Header 2A – 2B Differential Pressure	4/SG	2/SG	3/SG	1, 2, 3	20a, ~~20e~~

A

B

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TABLE 3.3-3 (Continued)

TABLE NOTATION

ACTION 14 - With the number of channels OPERABLE one less than the Minimum Channels OPERABLE, STARTUP and/or POWER OPERATION may continue provided the following conditions are satisfied:

a. Verify that one of the inoperable channels has been bypassed and place the other inoperable channel in the tripped condition within 1 hour.

b. All functional units affected by the bypassed/tripped channel shall also be placed in the bypassed/tripped condition as listed below.

Process Measurement Circuit	Functional Unit Bypassed/Tripped
1. Containment Pressure -	Containment Pressure – High (SIAS, CIAS, CSAS) Containment Pressure – High (RPS)
2. Steam Generator Pressure -	Steam Generator Pressure – Low (MSIS) AFAS-1 and AFAS-2 (AFAS) Thermal Margin/Low Pressure (RPS) Steam Generator Pressure – Low (RPS)
3. Steam Generator Level -	Steam Generator Level – Low (RPS) If SG-2A, then AFAS-1 (AFAS) If SG-2B, then AFAS-2 (AFAS)
4. Pressurizer Pressure -	Pressurizer Pressure – High (RPS) Pressurizer Pressure – Low (SIAS) Thermal Margin/Low Pressure (RPS)

INSERT 1

ACTION 15 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channels to OPERABLE status within 48 hours or be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours. LCO 3.0.4.a is not applicable when entering HOT SHUTDOWN.

ACTION 16 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or declare the associated valve inoperable and take the ACTION required by Specification 3.7.1.5.

ACTION ~~17~~ 17A - With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or place the inoperable channel in the tripped condition and verify that the Minimum Channels OPERABLE requirement is demonstrated within 1 hour; one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.

INSERT ACTION 17B

INSERT ACTION 17B

ACTION 17B With the number of OPERABLE Channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or in accordance with the Risk Informed Completion Time Program, or place the inoperable channel in the tripped condition and verify that the Minimum Channels OPERABLE requirement is demonstrated within 1 hour; one additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.

Attachment 2

Description of Procedures

The March 15, 2018 response to the request for additional information (Reference 11 in the cover letter) included a table that provided examples of risk management actions for certain Actions in Technical Specification (TS) 3.8.1.1, "A. C. Sources – Operating," for Units 1 and 2. Below is a description of the procedures that were included in the table of risk management actions (RMAs).

1(2)-OSP-100.01, Unit 1 (Unit 2) Schedule of Periodic Tests, Checks and Calibrations Week 1 1(2)-OSP-100.13, Unit 1 (Unit 2) Schedule of Periodic Tests, Checks and Calibrations Week 13	These are Operations procedures that provide instructions for performing TS surveillance requirements (SRs). When AC sources are inoperable, several Actions in TS 3.8.1.1 require performing SR 4.8.1.1.1.a to demonstrate operability of the offsite AC sources. The table of RMAs referenced these Operations procedures because they provide instructions for performing SR 4.8.1.1.1.a.
OP-AA-102-1003, Guarded Equipment	This fleet procedure provides detailed instructions for guarding essential plant equipment that must remain available as determined by the Shift Manager. The procedure provides guidance for guarding operable TS-required equipment when a redundant train or component is removed from service or when a work activity involves a high risk of affecting equipment in close proximity to the work. Guarding equipment involves protecting the equipment by posting signs, limiting access to the equipment, and controlling work on the equipment. The table of RMAs referenced this procedure because it provides instructions for guarding TS equipment when redundant equipment is inoperable. For example, when operating in accordance with the Actions of TS 3.8.1.1 with any of the required AC sources inoperable, the procedure would provide instructions for guarding the remaining operable AC sources.
2-OSP-59.01A, 2A Emergency Diesel Generator Monthly Surveillance 2-OSP-59.01B, 2B Emergency Diesel Generator Monthly Surveillance	These procedures provide instructions for performing the monthly SRs on the emergency diesel generators (EDGs). When one EDG is inoperable, the Actions in TS 3.8.1.1 require performing SR 4.8.1.1.2.a.4 to demonstrate operability of the remaining EDG. This procedure provides instructions for performing SR 4.8.1.1.2.a.4