

December 17, 2001

Mr. J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer
Florida Power and Light Company
P.O. Box 14000
Juno Beach, Florida 33408-0420

SUBJECT: ST. LUCIE UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS REGARDING
REDUNDANT TRAIN REQUIREMENTS WITH AN INOPERABLE EMERGENCY
DIESEL GENERATOR (TAC NOS. MB3181 AND MB3182)

Dear Mr. Stall:

The Commission has issued the enclosed Amendment Nos. 180 and 123 to Facility Operating License Nos. DPR-67 and NPF-16 for the St. Lucie Plant, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TS) in response to your application dated October 17, 2001.

These amendments revise the St. Lucie Unit 1 and 2 TS actions regarding inoperable redundant components when an Emergency Diesel Generator becomes inoperable.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Brendan T. Moroney, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-335
and 50-389

Enclosures:

1. Amendment No. 180 to DPR-67
2. Amendment No. 123 to NPF-16
3. Safety Evaluation

cc w/enclosures: See next page

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FLORIDA POWER & LIGHT COMPANY

DOCKET NO. 50-335

ST. LUCIE PLANT UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 180
License No. DPR-67

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company (the licensee), dated October 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Facility Operating License No. DPR-67 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.(2) to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 180, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 17, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 180

TO FACILITY OPERATING LICENSE NO. DPR-67

DOCKET NO. 50-335

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

Remove Pages

3/4 8-1
3/4 8-2

Insert Pages

3/4 8-1
3/4 8-2

FLORIDA POWER & LIGHT COMPANY
ORLANDO UTILITIES COMMISSION OF
THE CITY OF ORLANDO, FLORIDA

AND

FLORIDA MUNICIPAL POWER AGENCY

DOCKET NO. 50-389

ST. LUCIE PLANT UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 123
License No. NPF-16

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power & Light Company, et al. (the licensee), dated October 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Facility Operating License No. NPF-16 is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and by amending paragraph 2.C.2 to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 123, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 17, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 123

TO FACILITY OPERATING LICENSE NO. NPF-16

DOCKET NO. 50-389

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the area of change.

Remove Pages

3/4 8-1
3/4 8-2

Insert Pages

3/4 8-1
3/4 8-2

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 180 AND 123

TO FACILITY OPERATING LICENSES NOS. DPR-67 AND NPF-16

FLORIDA POWER AND LIGHT COMPANY, ET AL.

ST. LUCIE PLANT, UNITS NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

1.0 INTRODUCTION

By letter dated October 17, 2001, Florida Power and Light Company, et al. (the licensee), requested amendments to Operating Licenses DPR-67 and NPF-16 for St. Lucie Units 1 and 2, respectively. The proposed amendment would revise Actions b and c of Technical Specification (TS) 3.8.1.1, "Electrical Power Systems - AC Sources" to be comparable with actions specified in NUREG-1432, Revision 2, "Standard Technical Specifications, Combustion Engineering Plants." The license amendment request is intended to clarify appropriate TS actions to be taken when one emergency diesel generator (EDG) is inoperable or when one AC source and one EDG are inoperable and opposite train equipment is found inoperable.

2.0 BACKGROUND

St. Lucie Plant Units 1 & 2 TS Limiting Condition for Operation (LCO) 3.8.1.1 lists the independent and redundant AC power sources required to be operable. These include, as a minimum, two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and two separate and independent EDG sets, each with an engine-mounted and bulk fuel storage tank containing specified volumes of fuel for supplying the EDG sets, and a separate fuel transfer pump.

TS 3.8.1.1 Action b specifies required actions to be taken in the event one EDG should become inoperable, and TS 3.8.1.1 Action c specifies required actions to be taken should one offsite AC circuit and one EDG become inoperable. For either of these conditions of inoperable equipment, TS 3.8.1.1 Actions require (1) demonstration by test that the remaining AC sources are operable; (2) verification that all required systems, subsystems, trains, components and devices (required redundant features), which depend on the remaining operable EDG as a source of emergency power are also operable; and (3) verification that the steam-driven auxiliary feedwater pump is operable. In the context of these actions, verification means to administratively check, by examining logs or other information, to determine if certain components are out-of-service for maintenance or other reasons. The required TS verification

is intended to ensure that a loss of offsite power event will not result in a complete loss of safety function of critical systems.

3.0 EVALUATION

The licensee states in the license amendment request that the St. Lucie TS are inconsistent with respect to the actions required to be taken when an LCO is not met, depending on whether the action is entered as a result of an inoperable EDG (through Actions b and c of TS 3.8.1.1) or the required feature TS action statement requirements. The specific concern is that existing St. Lucie TS 3.8.1.1 Actions b and c would ultimately result in an unconditional unit shutdown, should an EDG be inoperable while required features on the opposite train are inoperable.

This inconsistency in the St. Lucie TS occurs as a result of the TS 3.8.1.1 Actions b and c requirements to verify, within 2 hours of entering either action, that required redundant features are operable, and that the steam-driven auxiliary feed pump is also operable. If the required redundant features are known to be inoperable and cannot be restored to operable status within the first 2 hours of being in either Action b or c, then a unit shutdown is required. In a review of St. Lucie TS requirements, it was shown that the TS do not always require a shutdown for inoperable redundant required features connected to the emergency buses if the loss occurs without TS 3.8.1.1 being entered. Specifically, Reactor Vessel Level Monitoring System (RVLMS) channels for post-accident monitoring are powered from emergency buses. Yet, the St. Lucie TS permit continued operation to the next scheduled refueling during a loss of both required RVLMS channels, as long as programmatic requirements are met and actions are taken to initiate alternate methods of monitoring reactor inventory. The proposed TS changes would remove this potential inconsistency associated with application of existing TS requirements.

Also, a second issue with TS interpretation could arise with respect to TS 3.8.1.1. If the required redundant features become inoperable after the first 2 hours of being in either Action b or c, then the St. Lucie TS could be interpreted to require performance of the actions of the required redundant features TS but not TS 3.8.1.1. This interpretation is incorrect because TS must continuously be met once the action is entered, otherwise the actions are not satisfied, and additional remedial actions must be taken. The proposed TS changes would also remove this potential ambiguity.

To correct the St. Lucie TS inconsistency, the licensee proposes to restructure the TS requirements by removing the unit shutdown requirement, should an EDG become inoperable while required features on the opposite train are inoperable. As a replacement, the licensee proposes TS based on NUREG-1432 requirements for verifying that required redundant features are operable. The NUREG-1432 TS require the same verification as the existing St. Lucie TS, with two important differences. First, the completion time for performing the verification is 4 hours, not 2 hours. Second, upon discovery of a concurrent inoperability of required redundant features, NUREG-1432 TS require the feature supported by the inoperable EDG to be declared inoperable. Thus, plant operators will be directed to supported feature TS action requirements for appropriate remedial actions for inoperable required features. These actions may result in a plant shutdown if insufficient equipment remains operable to support the assumptions of the safety analysis.

Based on the preceding discussion, the staff concludes that the proposed TS changes will correct the identified current TS inconsistencies involving actions required to be taken when an

LCO is not met, and they will provide TS that are comparable to NUREG-1432 actions for discovery of concurrent inoperability of required redundant features supported by an inoperable EDG. The proposed TS change to specify a 4-hour time period to verify that required redundant features are operable is acceptable because it allows the operator sufficient time to evaluate and repair any identified inoperable equipment. Thus, the identified TS changes and the remaining St. Lucie TS action requirements will ensure that a loss of offsite power during the period when an EDG is inoperable does not result in a complete loss of critical safety systems.

4.0 STATE CONSULTATION

Pursuant to a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. Nuclear Regulatory Commission, the State of Florida does not desire notification of issuance of license amendments.

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (66 FR 57121, dated November 14, 2001). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Carl Schulten, NRR

Date: December 17, 2001

Mr. J. A. Stall
Florida Power and Light Company

cc:

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