

NRR-PMDAPEm Resource

From: Orf, Tracy
Sent: Monday, June 06, 2011 10:02 AM
To: 'Wasik, Chris'
Cc: 'Liz Abbott (elizabeth_abbott@fpl.com)'
Subject: St. Lucie 1 EPU RAI clarifications (Instrumentation & Controls)
Attachments: REQUEST FOR ADDITIONAL INFORMATION.pdf

Chris,

Attached for your review are followup questions from the instrumentation and controls branch. Please let me know if you need a phone call for these questions.

Thanks,

Trace

Hearing Identifier: NRR_PMDA
Email Number: 261

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Created By: Tracy.Orf@nrc.gov

Recipients:

"Liz Abbott (elizabeth_abbott@fpl.com)" <elizabeth_abbott@fpl.com>

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"Wasik, Chris" <Chris.Wasik@fpl.com>

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REQUEST FOR ADDITIONAL INFORMATION
ST. LUCIE PLANT UNIT 1
TECHNICAL SPECIFICATIONS CHANGES SUBMITTED WITH EPU
TAC Number ME5091

Instrumentation and Controls Branch

Florida Power & Light, the licensee provided responses to March 9, 2011 (ML110680373) staff Request for Additional Information (RAI) in its April 1, 2011 letter, L-2011-117 (ML110950058). In its response the licensee referenced NRC letter to Nuclear Energy Institute letter as ML5250004 to support the variations in Notes 1 and 2. The stated reference is incorrect and it appears that the licensee intended to reference ML052500004, dated September 7, 2005. The licensee is requested to verify and confirm that either reference ML052500004 is correct or provide the correct reference. As stated in the March 9, 2011 RAIs the licensee was advised that the NRC provided the updated clarification for use of LSSS setpoints as TSTF-493, Rev. 4 by references ML093570168 and ML100710442. These two references present the clarified current staff position regarding LSSS related setpoints. Staff has reviewed the licensee responses and requests further clarifications to resolve the RAIs. Item numbers below match the item numbers in the licensee responses.

EICB-4

Staff has noted that Notes 1 and 2 are not consistent with either ML052500004 or the TSTF-493, Rev. 4 notes per ML093570168 and ML100710442 which represent the current NRC position and the licensee should follow the notes therein or explain how the amended notes meet the guidance of TSTF-493, Rev. 4. The instrument must behave within an acceptable pattern to assure that it is staying within an acceptable deviation and that the safety functions will be performed within the pre-established allowable limits. For this reason, the AFT must be centered around the field trip setpoint (FTSP) or the nominal trip setpoint and not any other number. The FTSP may be more conservative than the limiting trip setpoint. However, during the performance of an instrument channel surveillance the as-found value should not exceed the pre-determined AFT to assure proper instrument operation. If the as-found value is found to exceed the pre-determined AFT but is within the Allowable Value (AV) then the instrument loop must be evaluated based on plant procedures to determine appropriate actions and continued operability. Please note that for St. Lucie 1, the OL and AV are the same because they define the setting beyond which the instrument channel is inoperable. If the instrument channel performance as-found value is found to exceed the Allowable Value then the instrument channel must be declared inoperable. Licensee has selected a FTSP of 35.5% level steam generator level trip with an AFT of $\pm 0.5\%$. Thus if the as-found value is found to be greater than 36.0% or less than 35.0% then the instrument operability must be evaluated. If the as-found value is found to be less than the Operability Limit (OL) 34.78% then the instrument must be declared inoperable. Thus OL and AFT are not synonymous as was stated by the licensee in ML110950058 in response to RAI EICB-4.

The licensee is requested to provide the following clarifications/additional information:

- (i) Please confirm that the AFT allowance will be centered around the FTSP.
- (ii) Modify Note 1 to meet the guidance of TSTF-493, Rev.4 and state the actions that will be taken if the as-found tolerance is found to be greater than the pre-determined

AFT allowance or if it exceeds the OL. If the action statements are included in another document, then that document must be referenced in the technical specifications or the appropriate section of the FSAR. Please list what plant specific document(s) describe the actions to be taken to ensure operability is appropriately evaluated.

- (iii) If a different licensee position is stated, then the licensee must justify how the cited position provides equal or greater margin of safety for plant operations.

EICB-5

The instrument performance with respect to the as-left tolerance (ALT) must be judged based on the FTSP because this is the setpoint of the instrument after the calibration but just before placing the instrument back in service. If the instrument can be adjusted within the designed ALT value then it can be reasonably concluded that the instrument is functioning within its design parameters. On the other hand, if the instrument cannot be adjusted within the ALT then it is clear that the instrument is not operating per design and it should be declared inoperable. The limiting trip setpoint has no direct bearing on establishing the adjustability?

The licensee is requested to provide the following additional information:

- (i) Please confirm that the ALT allowance will be centered around the FTSP.
- (ii) Please confirm that the instrument will be declared inoperable if it cannot be adjusted within the pre-established ALT value.
- (iii) Please modify Note 2 to meet the guidance of TSTF-493, Rev. 4. Please note that TSTF-493, Rev. 2 Note 2, language allows the use of setpoints which are more conservative than the limiting trip setpoint (LTSP) but requires that the as-found and as-left tolerances apply to the actual setpoint implemented in the surveillance procedures which is FTSP for St. Lucie 1.
- (iv) If a different position is stated then the licensee must justify how the cited position provides equal or greater margin of safety for plant operations.

EICB-6

The licensee was requested to provide the staff with a copy of the setpoint calculation (ML110680373) but the calculation was not provided. The licensee stated that the calculation is a Westinghouse proprietary calculation. The licensee is advised that NRC routinely requests and receives proprietary information and has procedures under 10 CFR 2.390 regarding the handling of such information. In addition, the requested information was not included in response to the RAI. The licensee is therefore requested to submit the calculation for Staff review.