



April 18, 2015

L-2015-080
10 CFR 50.90

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

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

Re: Administrative Changes to Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

References:

1. Florida Power & Light Company letter L-2014-015, "Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," February 20, 2014 (ML 14070A087)
2. NRC E-mail "Request for Additional Information - TSTF 425 LAR - TACs MF3495/96," November 17, 2014 (ML 14322A925)
3. Florida Power & Light Company letter L-2014-370, "Response to Request for Additional Information Regarding License Amendment Request to Implement Technical Specifications Task Force (TSTF)-425, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specifications Task Force (RITSTF) Initiative 5B,' " December 11, 2014 (ML 14349A333)
4. NRC E-mail "Request for Additional Information - TSTF 425 - TACs MF3495/96," December 19, 2014 (ML 14355A000)
5. Florida Power & Light Company letter L-2015-013, "Response to Request for Additional Information Regarding License Amendment Request to Implement Technical Specifications Task Force (TSTF)-425, Revision 3, 'Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specifications Task Force (RITSTF) Initiative 5B,' " January 13, 2015 (ML 15029A497)
6. Florida Power & Light Company letter L-2015-001, "Supplement to Application for Technical Specification Change Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," January 28, 2015

In Reference 1 and supplemented by References 3 and 4, Florida Power & Light Company (FPL) submitted a request for an amendment to the Technical Specifications (TS) for St. Lucie Units 1 and 2. The proposed amendment would modify the TS by relocating specific

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surveillance frequencies to a licensee-controlled program with implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies." The changes are consistent with U.S. Nuclear Regulatory Commission (NRC)-approved TS Task Force Standard TS change TSTF-425, "Relocate Surveillance Frequencies to Licensee Control- RITSTF [Risk-Informed TS Task Force] Initiative 5b," Revision 3.

A review of the TS markups included in References 1, 3, and 4 identified the need for editorial changes to some of the TS markups. The changes, which are administrative in nature, are necessary to correct typographical errors, adjust page numbering, and update the TS Index to reflect the proposed changes. Attachment 1 discusses the editorial changes, and Attachments 2 and 3 provide revised markups of the TS pages. The markups included in the attachments supersede the corresponding TS markups provided in References 1, 3, and 4.

The corrections to the TS markups do not alter the conclusion in Reference 1 that the proposed changes do not involve a significant hazards consideration.

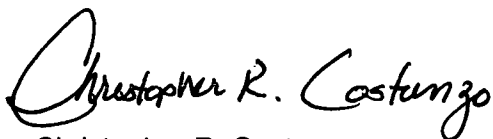
This letter contains no new regulatory commitments and does not modify any existing commitments.

Should you have any questions regarding this submittal, please contact Mr. Eric Katzman, Licensing Manager, at (772) 467-7734.

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

Executed on April 18th, 2015

Sincerely,

A handwritten signature in black ink that reads "Christopher R. Costanzo". The signature is written in a cursive, flowing style.

Christopher R. Costanzo
Site Vice President
St. Lucie Nuclear Plant

Attachments (3)

cc: NRC Regional Administrator, Region II
NRC Senior Resident Inspector, St. Lucie Units 1 and 2
NRC Project Manager
Ms. Cindy Becker, Florida Department of Health

ATTACHMENT 1

Description of Editorial Changes to the Markups of the Technical Specifications

Changes to the TS Markups for St. Lucie Unit 1

1. The markup of TS Table 4.4-4, Primary Coolant Specific Activity Sample and Analysis Program, in Reference 4 contains an editorial error. In the table on page 3/4 4-19, the markup has a strikethrough in the number 2 in the third row of the third column, Modes in which Sample and Analysis Required. Attachment 2 provides a corrected markup of Table 4.4-4, which removes the strikethrough.
2. The text of Insert 2 (Surveillance Frequency Control Program) in the TS markup provided in Reference 1 contains a typographical error in item b. Attachment 2 includes a corrected insert.
3. The description of the Surveillance Frequency Control Program (Insert 2) will not fit on page 6-15g as proposed in the TS markup in Reference 1. Consequently, the description is moved to page 6-15h as shown in the TS markups provided in Attachment 2.

Changes to the TS Markups for St. Lucie Unit 2

1. The text of Insert 2 (Surveillance Frequency Control Program) in the TS markup provided in Reference 1 contains a typographical error in item b. Attachment 3 includes a corrected insert.
2. The TS markup in Reference 1 designated the Surveillance Frequency Control Program (Insert 2) as new item p under TS 6.8.4, Procedures and Programs; however, Amendment 169 to the TS added the Snubber Testing Program as item p. Therefore, the Surveillance Frequency Control Program is re-designated as item q and is moved to subsequent page 6-16 as shown in the TS markups provided in Attachment 3.
3. The relocation of information discussed in item 2 will move the reporting requirement, "ANNUAL REPORTS," to page 6-17. Attachment 3 includes a markup of the TS Index that shows the change to the page number.
4. Reference 3 removed the proposed change to eliminate TS Table 4.4-3, Reactor Coolant System Chemistry Limits Surveillance Requirements, and Reference 4 removed the word "Program" from the title of TS Table 4.4-4. Attachment 3 provides a markup of the TS Index that incorporates these changes.

ATTACHMENT 2

St. Lucie Unit 1

Markups of the Technical Specifications

TABLE 4.4-4
PRIMARY COOLANT SPECIFIC ACTIVITY SAMPLE
AND ANALYSIS PROGRAM

TYPE OF MEASUREMENT AND ANALYSIS	MINIMUM FREQUENCY	MODES IN WHICH SAMPLE AND ANALYSIS REQUIRED
1. DOSE EQUIVALENT XE-133 Determination	1 per 7 days ← SFCP	1, 2, 3 and 4
2. Isotopic Analysis for DOSE EQUIVALENT I-131 Concentration	1 per 14 days ← SFCP	1
3. Isotopic Analysis for Iodine Including I-131, I-132, I-133, I-134, and I-135	a) Once per 4 hours, whenever the DOSE EQUIVALENT I-131 exceeds 1.0 μ Ci/gram, and b) One sample between 2 and 6 hours following a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER within a one hour period.	1 [#] , 2 [#] , 3 [#] , and 4 [#] 1, 2, 3

Until the specific activity of the primary coolant system is restored within its limits.

-----No changes to this page-----

ADMINISTRATIVE CONTROLS (continued)

- m. Control Room Envelope Habitability Program (continued)
- c. Requirements for (i) determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
 - d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the CREVS, operating at the flow rate required by the VFTP, at a Frequency of 36 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 36 month assessment of the CRE boundary.
 - e. The quantitative limits on unfiltered air leakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air leakage measured by the testing described in paragraph c. The unfiltered air leakage limit for radiological challenges is the leakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air leakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
 - f. The provisions of SR 4.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered leakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.
- n. Diesel Fuel Oil Testing Program
- A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:
- (i) Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 - 1. An API gravity or an absolute specific gravity within limits,
 - 2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 - 3. A clear and bright appearance with proper color or a water and sediment content within limits;
 - (ii) Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
 - (iii) Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days.
- The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

INSERT 2 (Unit-1)

o. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.

INSERT 2 (Unit 1)

ADMINISTRATIVE CONTROLS (continued)

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment of the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

ATTACHMENT 3

St. Lucie Unit 2

Markups of the Technical Specifications

INSERT 2 (Unit-2)

q. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.

-----No changes to this page-----

ADMINISTRATIVE CONTROLS (continued)

n. Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- (i) Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 - 1. An API gravity or an absolute specific gravity within limits,
 - 2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 - 3. A clear and bright appearance with proper color or a water and sediment content within limits;
- (ii) Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
- (iii) Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days.

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

o. Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendation of Regulatory position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

p. Snubber Testing Program

This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:

- 1. This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.
- 2. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(b) subject to limitations and modifications listed in 10 CFR 50.55a(b) and subject to Commission approval.
- 3. The program shall, as required by 10 CFR 50.55a(b)(3)(v)(B), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants".
- 4. The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)(B)) subject to the limitations and modifications listed therein.

INSERT 2 (Unit 2)

ADMINISTRATIVE CONTROLS

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier; and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS^{1/}

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

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