



FPL

July 15, 2015

L-2015-079
10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: St. Lucie Nuclear Plant Units 1 and 2
Docket Nos.: 50-335 and 50-389
License Amendment Request to Standardize the Required Actions for
Inoperability of Auxiliary Feedwater Pumps

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) hereby requests to amend Renewed Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2. The proposed change will bring about consistency between the St. Lucie Unit 1 and Unit 2 Technical Specifications (TSs) in required actions for inoperability of auxiliary feedwater (AFW) pumps. It will align the Unit 1 TSs with Combustion Engineering Standard Technical Specifications NUREG-0212, Revision 2, on which the Unit 2 TSs are based, with respect to the required action for the condition where all three auxiliary feedwater (AFW) pumps are inoperable in Modes 1, 2, and 3. Currently, by default, Unit 1 Limiting Condition for Operation (LCO) 3.7.1.2 requires entry into LCO 3.0.3 for the condition where all three AFW pumps are inoperable, precipitating a plant maneuver with no operable AFW pumps. NUREG-0212, Revision 2 (and Unit 2) LCO 3.7.1.2 Action c mandates corrective action to commence immediately to restore at least one AFW pump to operable status. The intent of this action is to maintain the unit in a stable condition while implementing corrective action to restore at least one AFW pump to operable status; however, the current required action does not articulate this intent. In Combustion Engineering Standard Technical Specifications NUREG-1432 (STS), STS 3.7.5 Condition E includes a Note that prohibits any mode change until one AFW pump has been restored to operable status. To clarify the intent of Unit 1 and Unit 2 LCO 3.7.1.2 Action c, it is proposed to add a Note that is similar to the STS 3.7.5 Condition E Note to LCO 3.7.1.2 Action c for both units. In addition, administrative changes and enhancements to further align existing Unit 1 and Unit 2 required actions are proposed.

The Enclosure provides a description and assessment of the proposed change. In Attachments 1 and 2 are the marked up Unit 1 TS page and the revised (clean) Unit 1 TS page, respectively. The Unit 2 TS page markup and revised (clean) page are presented in Attachments 3 and 4, respectively.

This license amendment request contains no new regulatory commitments and does not modify any existing commitments.

FPL requests approval of the proposed change within one year of receipt, and once approved, will implement the amendment within 90 days.

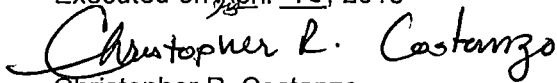
This change has been reviewed by the St. Lucie Plant Onsite Review Group. A copy of this submittal is also being sent to our appointed state official pursuant to 10 CFR 50.91.

If you have any questions or require additional information, please contact Eric Katzman, Licensing Manager, at (772) 467-7734.

A001
NRK

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

Executed on ^{July}~~April~~ 15, 2015



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

Enclosure: Description and Assessment of Proposed Change

Attachments

1. Unit 1 Technical Specifications Page Markup
2. Revised Unit 1 Technical Specifications Page
3. Unit 2 Technical Specifications Page Markup
4. Revised Unit 2 Technical Specifications Page

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, St. Lucie Nuclear Plant
USNRC Senior Resident Inspector, St. Lucie Nuclear Plant
Ms. Cindy Becker, Florida Department of Health

Enclosure
Description and Assessment of Proposed Change

Subject: Standardize the Required Actions for Inoperability of Auxiliary Feedwater Pumps

- 1.0 SUMMARY DESCRIPTION
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ATTACHMENTS:

- 1. Unit 1 Technical Specifications Page Markup
- 2. Revised Unit 1 Technical Specifications Page
- 3. Unit 2 Technical Specifications Page Markup
- 4. Revised Unit 2 Technical Specifications Page

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Renewed Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2. The proposed change will bring about consistency between the St. Lucie Unit 1 and Unit 2 Technical Specifications (TSs) in required actions for inoperability of auxiliary feedwater (AFW) pumps. St. Lucie Unit 1 TSs are based on Combustion Engineering Standard Technical Specifications NUREG-0212, Revision 1. The requested change will align the Unit 1 TSs with NUREG-0212, Revision 2, on which the Unit 2 TSs are based, with respect to the required action for the condition where all three auxiliary feedwater (AFW) pumps are inoperable in Modes 1, 2, and 3. Currently, by default, Unit 1 Limiting Condition for Operation (LCO) 3.7.1.2 requires entry into LCO 3.0.3 for the condition where all three AFW pumps are inoperable, precipitating a plant maneuver with no operable AFW pumps. NUREG-0212, Revision 2 (and Unit 2) LCO 3.7.1.2 Action c mandates corrective action to commence immediately to restore at least one AFW pump to operable status. The intent of this action is to maintain the unit in a stable condition while implementing corrective action to restore at least one AFW pump to operable status; however, the current required action does not articulate this intent. In Combustion Engineering Standard Technical Specifications NUREG-1432 (STS), STS 3.7.5 Condition E includes a Note that prohibits any mode change until one AFW pump has been restored to operable status. To clarify the intent of Unit 1 and Unit 2 LCO 3.7.1.2 Action c, it is proposed to add a Note that is similar to the STS 3.7.5 Condition E Note to LCO 3.7.1.2 Action c for both units.

Enhancements are also requested. Specifically, for the Unit 1 TSs it is proposed to add a required action, LCO 3.7.1.2 Action b, directing shutdown when two AFW pumps are inoperable so that the conditions where one, two, and three AFW pumps are inoperable will be explicitly addressed in Unit 1 LCO 3.7.1.2. Secondly, an administrative change is proposed for the existing required action for the condition where one AFW pump is inoperable. Lastly, for Unit 2, an administrative change and enhancement are proposed so that Actions a, b, and c for both units will read identically.

2.0 DETAILED DESCRIPTION

The proposed amendments will add a required action for inoperability of all three AFW pumps in Modes 1, 2, and 3 to Unit 1 LCO 3.7.1.2 (new Action c) that is identical to NUREG-0212, Revision 2 LCO 3.7.1.2 Action c and existing Unit 2 LCO 3.7.1.2 Action c. In addition, Unit 1 LCO 3.7.1.2 (new) Action c and existing Unit 2 LCO 3.7.1.2 Action c will be revised to include a Note to suspend Mode changes that is similar to that for STS 3.7.5. For Unit 1 LCO 3.7.1.2, an administrative change is proposed for Action a to clarify the restoration and shutdown actions. The inclusion of explicit shutdown instructions for the condition where two AFW pumps are inoperable is proposed as new Action b as an enhancement. In addition, to further align Unit 1 and Unit 2 LCO 3.7.1.2, it is requested to enhance the language describing the restoration action in Unit 2 LCO 3.7.1.2 Action a and to correct the grammar in Action b as an administrative change.

Unit 1 LCO 3.7.1.2 currently only addresses the condition where one AFW pump is inoperable and reads:

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore at least three auxiliary feedwater pumps (two motor driven pumps and one capable of being powered by an OPERABLE steam supply system) to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

NUREG-0212, Revision 2 LCO 3.7.1.2 Action c and Unit 2 LCO 3.7.1.2 Action c require corrective action to be implemented, but do not prohibit a mode change when all three AFW pumps are inoperable and read:

NUREG-0212, Revision 2

ACTION:

- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status as soon as possible.

Unit 2 LCO 3.7.1.2

ACTION:

- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.

STS 3.7.5 reads:

Condition E. Three AFW trains inoperable in MODE 1, 2, or 3.

Required Action E.1

-----NOTE-----

LCO 3.0.3 and all other LCO Required Actions requiring MODE changes are suspended until one AFW train is restored to OPERABLE status.

Initiate action to restore one AFW train to OPERABLE status.

Completion Time: Immediately

It is proposed to change Unit 1 LCO 3.7.1.2 as follows:

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore ~~at least three the~~ auxiliary feedwater pumps ~~(two motor driven pumps and one capable of being powered by an OPERABLE steam supply system)~~ to OPERABLE status within 72 hours or be in ~~HOT SHUTDOWN within the next 12 hours~~ **HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.**
- b. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

NOTE

LCO 3.0.3 and all other LCO Actions requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.

- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.

It is proposed to change Unit 2 LCO 3.7.1.2 as follows:

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the ~~required~~ auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

NOTE

LCO 3.0.3 and all other LCO Actions requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.

- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.

The St. Lucie Unit 1 and Unit 2 Technical Specifications Bases do not address required actions in detail for auxiliary feedwater; therefore, the corresponding TS Bases do not require modification as a result of the proposed change.

3.0 TECHNICAL EVALUATION

The Unit 1 and Unit 2 auxiliary feedwater systems automatically supply feedwater to the steam generators to remove decay heat from the reactor coolant system upon the loss of normal feedwater. Each AFW system consists of two motor-driven AFW pumps and one steam turbine-driven pump configured into three trains. Each motor-driven pump provides 100% of AFW flow capacity; the turbine-driven pump provides 100% of the required capacity to the steam generators as assumed in the accident analysis. Each motor-driven pump supplies feedwater to one steam generator, although via a cross-connection flow can be routed to the other steam generator. The turbine-driven pump can supply both steam generators. Each motor-driven pump is powered from independent Class 1E 4.16 kV safety-related buses. The turbine driven pump and associated controls are powered from the Class 1E safety-related DC buses. The St. Lucie Unit 1 AFW system configuration is the same as the Unit 2 AFW system; therefore, the Unit 1 AFW system configuration is similar to that upon which NUREG-0212, Revision 2 LCO 3.7.1.2 is predicated. Furthermore, the St. Lucie Unit 1 and Unit 2 AFW systems are both similar in configuration to that upon which STS 3.7.5 is predicated.

With all three AFW pumps inoperable in Mode 1, 2, or 3, the affected unit is in a seriously degraded condition with no safety-related means for conducting a cooldown, and only limited means for conducting a cooldown with non-safety grade equipment. In such a condition, the unit should not be perturbed by any action, including a power change, which might result in a trip. Alternately, the seriousness of this condition demands immediate action to restore at least one AFW pump to operable status. Entry into LCO 3.0.3 or performing a mode change with no operable AFW pumps could place the unit in a less safe condition.

The proposed change will preclude a plant maneuver until auxiliary feedwater capability has been restored via at least one AFW pump, thereby enhancing nuclear safety.

The addition of Unit 1 LCO 3.7.1.2 Action b is purposed such that required actions for all three conditions – one, two, and three AFW pumps inoperable – are explicitly articulated in the LCO. This is not a new required action, as currently when two AFW pumps are inoperable, shutdown is required per LCO 3.0.3 by default; however, the proposed Unit 1 LCO 3.7.1.2 Action b will be identical in language to the existing shutdown action in Unit 2 LCO Action 3.7.1.2 Action b. This captures the intent of LCO 3.0.3, which is to place the unit in a Mode where the specification does not apply, while forgoing the 1 hour that is afforded by LCO 3.0.3 to initiate action. With all three conditions and required actions included in Unit 1 LCO 3.7.1.2, it is further proposed to change the language for the shutdown in Action a from "...HOT SHUTDOWN within the next 12 hours..." to "...HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours..." thereby making LCO 3.7.1.2 Action a identical for both units. The end result of Unit 1 LCO 3.7.1.2 Action a will remain the same – HOT SHUTDOWN – and the

language will reflect the typical manner in which a shutdown is instructed (i.e., tiered approach to Mode reduction).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

- 10 CFR 50.36, "Technical Specifications" – provides the requirements for the contents of the technical specifications
- General Design Criteria for Nuclear Power Plants
 - *Criterion 34 – Residual heat removal.* A system to remove residual heat shall be provided. The system safety function shall be to transfer fission product decay heat and other residual heat from the reactor core at a rate such that specified acceptable fuel design limits and the design conditions of the reactor coolant pressure boundary are not exceeded.

The proposed change to St. Lucie Unit 1 and Unit 2 LCO 3.7.1.2 is consistent with the above regulatory requirements and reflects the language of NUREG-0212, Revision 2 and STS 3.7.5. The St. Lucie TSs are based on NUREG-0212 which is the predecessor of the current Combustion Engineering Standard Technical Specifications, NUREG-1432. St. Lucie has not converted to NUREG-1432, but an aspect of STS 3.7.5 was borrowed for the purpose of clarification. NUREG-0212 and NUREG-1432 have previously been approved by the Nuclear Regulatory Commission (NRC).

4.2 No Significant Hazards Consideration Determination

FPL is requesting approval of a change to modify the St. Lucie Unit 1 and Unit 2 Technical Specifications to include identical required actions for the conditions where two and three auxiliary feedwater pumps are inoperable, to preclude a mode change for the latter condition, and to implement other enhancements and administrative changes. The standards used to arrive at a determination that a request for amendment involves a no significant hazards consideration are included in Title 10 of the Code of Federal Regulations (CFR) Section 50.92, which states that no significant hazards considerations are involved if the operation of the facility in accordance with the amendment would not result in either of the following consequences:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated
- (3) Involve a significant reduction in a margin of safety

As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below.

- (1) Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change will not result in any significant increase in the probability or consequences of an accident previously evaluated. The auxiliary feedwater system mitigates the consequences of any event with a loss of normal feedwater. By prohibiting a plant maneuver when there are no operable auxiliary feedwater pumps, the plant will not be placed into a less safe condition where the probability could be increased,

consequences could be exacerbated, or different consequences could result for an accident previously evaluated.

The proposed enhancements and administrative changes are modifications to existing actions that have no potential to impact the probability or consequences of an accident previously evaluated.

- (2) Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve physical modification of the plant. No new or different type of equipment will be installed. The proposed change will require prompt action to restore at least one auxiliary feedwater pump to operable status when all three are inoperable. Restricting a power maneuver until at least one auxiliary feedwater pump has been restored to operable status will preclude entry into a less safe condition with no auxiliary feedwater available for accident mitigation. This change will not have an adverse effect on equipment required for accident mitigation.

The proposed enhancements and administrative changes are modifications to existing actions that have no potential to impact equipment required for accident mitigation.

- (3) Does the proposed change involve a significant reduction in a margin of safety?

The proposed change does not involve a significant reduction in a margin of safety. No plant equipment or accident analyses will be affected. Additionally, the proposed change will not relax any criteria used to establish safety limits, safety system settings, or the bases for any limiting conditions for operation. Safety analysis acceptance criteria are not affected. Plant operation will continue within the design basis.

Based on the foregoing evaluation, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(b), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusions

Based on the considerations discussed above, (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.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement; however, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact

statement or environmental assessment needs to be prepared in connection with the proposed amendment.

6.0 PRECEDENT

The precedent for this change was established through NRC approval of the Combustion Engineering Standard Technical Specifications. Although not necessarily specific to auxiliary feedwater, there are numerous precedents for plants having been approved to align their technical specifications with the standard technical specifications.

7.0 REFERENCES

1. NUREG-1432 – Standard Technical Specifications for Combustion Engineering Plants, Volume 1, Revision 4.0
2. NUREG-0212 – Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors, Revision 1
3. NUREG-0212 – Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors, Revision 2

Attachment 1

Unit 1 Technical Specifications Page Markup

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two motor driven feedwater pumps, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the ~~at least three~~ auxiliary feedwater pumps ~~(two motor driven pumps and one capable of being powered by an OPERABLE steam supply system)~~ to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the ~~next 12~~ following 6 hours.

INSERT 1

- db. LCO 3.0.4.b is not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:

INSERT 1

- b. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

NOTE

LCO 3.0.3 and all other LCO Actions requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.

- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.

Attachment 2

Unit 2 Technical Specifications Page Markup

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two feedwater pumps, each capable of being powered from separate OPERABLE emergency busses, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.
- d. LCO 3.0.4.b is not applicable.

INSERT 2 →

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 - 1. Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

INSERT 2

NOTE

LCO 3.0.3 and all other LCO Actions requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status. .

Attachment 3

Revised Unit 1 Technical Specifications Page

The revised page reflects the current revision of the Unit 1 Facility Operating License, Amendment No. 220.

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two motor driven feedwater pumps, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the auxiliary feedwater pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

NOTE

LCO 3.0.3 and all other LCO Actions requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.

- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.
- d. LCO 3.0.4.b is not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:

Attachment 4

Revised Unit 2 Technical Specifications Page

The revised page reflects the current revision of the Unit 1 Facility Operating License, Amendment No. 170.

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

- 3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:
- Two feedwater pumps, each capable of being powered from separate OPERABLE emergency busses, and
 - One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- With one auxiliary feedwater pump inoperable, restore the auxiliary feedwater pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- With two auxiliary feedwater pumps inoperable, be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

NOTE

LCO 3.0.3 and all other LCO Actions requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.

- With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.
- LCO 3.0.4.b is not applicable.

SURVEILLANCE REQUIREMENTS

- 4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:
- At least once per 31 days by:
 - Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.