

NRR-PMDAPEm Resource

From: Buckberg, Perry
Sent: Tuesday, March 08, 2016 12:43 PM
To: Frehafer, Ken
Cc: Snyder, Mike; Cross, William; 'Katzman, Eric'
Subject: Request for Additional Information - St Lucie TSTF-422 - MF6683/MF6684
Attachments: St Lucie TSTF-422 STSB RAIs 3-8-16.pdf

Ken,

By request letter dated August 31, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15254A180), Florida Power & Light Company (the licensee) proposed to adopt TSTF-422, Revision 2, "Change in Technical Specifications End States, (CE NPSD-1186)," Using the Consolidated Line Item Improvement Process.

The U.S. Nuclear Regulatory Commission Staff reviewed the submittal and identified areas where it needs additional information and clarification to complete its review. The Request for Additional Information (RAI) is attached. The NRC requests that the licensee respond to this RAI within 45 days of this email.

Thanks,

Perry Buckberg

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Hearing Identifier: NRR_PMDA
Email Number: 2693

Mail Envelope Properties (Perry.Buckberg@nrc.gov20160308124200)

Subject: Request for Additional Information - St Lucie TSTF-422 - MF6683/MF6684
Sent Date: 3/8/2016 12:42:52 PM
Received Date: 3/8/2016 12:42:00 PM
From: Buckberg, Perry

Created By: Perry.Buckberg@nrc.gov

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| Files | Size | Date & Time |
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| MESSAGE | 952 | 3/8/2016 12:42:00 PM |
| St Lucie TSTF-422 STSB RAIs 3-8-16.pdf | | 109832 |

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: ZZZ

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST FOR
ADOPTION OF TSTF-422, REVISION 2
ST LUCIE UNITS 1 AND 2
DOCKET NOS. 50-335 AND 50-389
(CAC NOS. MF6683 AND 6684)

RAI-MF6683/4-STSB-01

The proposed change to both units' TS LCO 3.4.1.3 "RCS Loops – Hot Shutdown," adds an insertion in the LCO ACTION 'a' statement per TSTF-422. The insertion states:

"Initiate action to make at least one steam generator available for decay heat removal via natural circulation."

The approved TSTF-422 change for the LCO also requires that the above Action must be initiated "immediately." The proposed change does not specify such Completion Time requirement. Please revise the change per the approved TSTF, or provide justification for the change as proposed in the application.

RAI-MF6683/4-STSB-02

The Staff's review finds that TS changes proposed in the LAR reflect changes to pages effected by recent Unit 1 Amendment 227 and Unit 2 Amendment 177. The following marked-up TS pages included in the TSTF-422 LAR were changed after August 31, 2015, LAR issued date:

- Unit 1 TS pages 3/4 7-20 and 3/4 7-20a
- Unit 2 TS page 3/4 7-17

For example, the current TS LCO page 3/4 7-20 was updated by amendment 227, whereas the submitted TS mark-up page shows amendment # 206. As a result, the proposed TS mark-up to LCO 3.7.7.1, Action 'e' is now specified as Action 'g' in the current TSs. To ensure an accurate staff safety evaluation, please provide TS change pages that reflect the current St. Lucie TSs.

RAI-MF6683/4-STSB-03

Section 5.0 of the safety evaluation (SE) (ADAMS Accession No. ML011980047) for Topical Report CE NPSD-1186, REV. 00, provides justification for the approved end-states related changes for the Combustion Engineering (CE) units standard technical specifications (STS). The application states that the PSL Units 1 and 2 TSs have not been converted to the Standard TS (STS) of NUREG-1432, "Standard Technical Specifications - Combustion Engineering Plants," (on which TSTF-422, Revision 2 is based).

Since, the subject TSs have not been converted to the STS, the Staff requests the licensee to review the Staff's SE to determine whether St. Lucie's plant-specific systems, functions and nomenclature for the proposed changes, are equivalent to those addressed in the Staff's SE. Please provide the results of that review, including a discussion of any differences. The application does not provide this level of detail.

Regulatory Basis

10 CFR 50.90, *Application for amendment of license, construction permit, or early site permit* states:

"Whenever a holder of a license, including a construction permit and operating license under this part, and an early site permit, combined license, and manufacturing license under part 52 of this chapter, desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications."