

NRR-PMDAPEm Resource

From: Buckberg, Perry
Sent: Friday, June 17, 2016 12:22 PM
To: 'Frehafer, Ken'
Cc: Snyder, Mike; Catron, Steve; Mack, Jarrett
Subject: Request for Additional Information - St. Lucie FOST Sediment Cleaning SBPB - MF6488/MF6489
Attachments: St. Lucie RAI-MF6488MF6489-SBPB-2 6-17-16.pdf

Ken,

By License Amendment Request dated July 14, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A032), Florida Power & Light Company (the licensee) submitted a request to remove Technical Specifications (TS) Limiting Condition for Operation (LCO) 4.8.1.1.2.g (fuel oil storage tank sediment cleaning and pressure testing) and relocate the TS requirements to the Updated Final Safety Analysis Report.

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 provided below. The NRC requests that the licensee respond to this RAI within 30 days of this email.

Thanks,

Perry Buckberg

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U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

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From: Buckberg, Perry

Created By: Perry.Buckberg@nrc.gov

Recipients:

"Snyder, Mike" <Mike.Snyder@fpl.com>
Tracking Status: None
"Catron, Steve" <Steve.Catron@fpl.com>
Tracking Status: None
"Mack, Jarrett" <Jarrett.Mack@fpl.com>
Tracking Status: None
"Frehafer, Ken" <Ken.Frehafer@fpl.com>
Tracking Status: None

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Options

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REQUEST FOR ADDITIONAL INFORMATION
ST. LUCIE, UNIT 1 AND 2 (DOCKETS 50-335 AND 50-389)
LICENSE AMENDMENT REQUEST FOR TECHNICAL SPECIFICATION CHANGE
TO REMOVE THE 10 YEAR SEDIMENT CLEANING OF THE FUEL OIL STORAGE TANK AND
RELOCATE TO LICENSEE-CONTROLLED DOCUMENTS
(MF6488 & MF6489)

RAI-MF6488/MF6489-SBPB-02

BACKGROUND:

As indicated in the July 14, 2015, LAR, Updated Final Safety Analysis Report (UFSAR) Section 3.1.17 for both St. Lucie Unit 1 and Unit 2 discusses conformance with General Design Criterion (GDC) 17, "Electrical Power Systems". GDC 17 requires that an onsite electric power system and an offsite electric power system be provided to permit functioning of structures, systems, and components important to safety. GDC 17 also includes requirements concerning system capacity, capability, independence, redundancy, availability, testability, and reliability.

One method of meeting GDC 17 requirements, as specified in Section 9.5.4 of NUREG-0800, is a commitment to meeting RG 1.137. Compliance with RG 1.137, Rev. 1, Section C.2.f (or RG 1.137, Rev. 2, Section C.13.6) ensures that, as a minimum, the fuel oil stored in supply tanks is removed, the accumulated sediment is removed, the tanks are cleaned, and the interior is inspected at 10-year intervals.

ISSUE:

As indicated in the St Lucie Technical Specification (TS) BASES, the Surveillance Requirements (SR) for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.137. Tank cleaning criteria is based on Section C.2.f of RG 1.137, Rev. 1, and compliance with RG 1.137 is not addressed in St Lucie UFSAR.

St. Lucie SR 4.8.1.1.2.g was previously revised to replace the periodicity of, "At least once per ten years..." with, "In accordance with the Surveillance Frequency Control Program..." with the adoption of TSTF-425 related operating license amendments DPR-67 223 & NPF-16 173. With this removal of the cleaning requirement interval from the TS, it is unclear whether this cleaning requirement will remain in accordance with the Surveillance Frequency Control Program or what administrative controls will be included in UFSAR to ensure the cleaning will be performed.

RAI:

The NRC does not find any mention of RG 1.137 in the LAR as it relates to the SR for cleaning diesel fuel oil storage tanks. The staff requests the licensee to provide additional details on the proposed UFSAR cleaning criteria and administrative controls to ensure diesel fuel oil storage tank cleaning will satisfy RG 1.137.