

50-333

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## DESCRIPTION

Ltr notarized 5-20-76.....trans the following:

## ENCLOSURE

Amdt to OL/Change to Tech Specs: Consisting of revision to Appendix A Tech Specs with regard to safety related hydraulic snubbers.....

(40 cys encl rec'd)

PLANT NAME: St Lucie #1

FOR ACTION/INFORMATION 6-7-76 ehf

ASSIGNED AD:		ASSIGNED AD:
BRANCH CHIEF:	Ziemann (5)	BRANCH CHIEF:
PROJECT MANAGER:	Silver	PROJECT MANAGER:
LIC. ASST.:	Diggs	LIC. ASST.:
	w/ all extras	

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CONTROL NUMBER

5653

Mr Steblo

Florida Power & Light Co  
Miami, Fla  
R E Uhrig

2-20-76

6-7-76

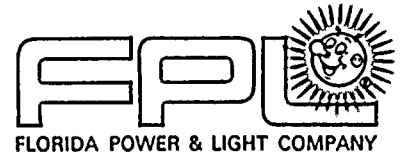
3 signed

Per notarized 2-20-76.....trans the following:  
And to OL\Change to Tech Specs: Consisting  
of revision to Appendix A Tech Specs with regard  
to safety related hydraulic snubbers.....

(40 cys encl rec'd)

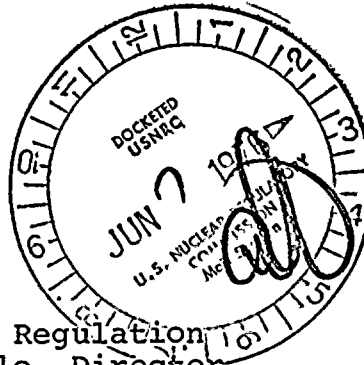
PLANT NAME: St Lucie #1

6-7-76 ehf



May 20, 1976

L-76-207



Director of Nuclear Reactor Regulation  
 Attention: Mr. Victor Stello, Director  
 Division of Operating Reactors  
 U. S. Nuclear Regulatory Commission  
 Washington, D. C. 20555

Dear Mr. Stello:

Re: St. Lucie Unit 1  
 Docket No. 50-335.  
 Proposed Amendment to  
Facility Operating License DPR-67



In accordance with 10 CFR 50.30, Florida Power and Light Company submits herewith three (3) signed originals and forty (40) conformed copies of a request to amend Appendix A of Facility Operating License DPR-67.

This submittal proposes Technical Specification changes relating to the surveillance of safety related hydraulic snubbers at St. Lucie Unit 1. The proposed changes are as described below and as shown on the accompanying Technical Specification pages bearing the date of this letter in the lower right hand corner.

Pages 3/4 7-31 through 3/4 7-38 (Table 3.7-2)

Table 3.7-2 is revised to include the FPL location number for each snubber listed.

On page 7-33, one Mark No. is corrected by changing it from MS-548-16A to MS-649-304A (FPL No. 039).

On page 7-34, three Mark Nos. are corrected by changing them from:

BF-661-4020 to BF-549-17 (FPL No. 052)  
 SI-969-6198 to MS-549-11 (FPL No. 061)  
 SI-970-1248 to MS-549-11 (FPL No. 066)

On page 7-36, four Mark Nos. are corrected by changing them from:

5653

1871, 1872

Director of Nuclear Reactor Regulation  
Attention: Mr. Victor Stello, Director  
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SI-676-250 to SI-676-2481 (FPL No. 087)  
SI-676-2475 to SI-676-247 (FPL No. 110)  
SI-V-1 to SI-971-6236 (FPL No. 113)  
SI-V-1 to SI-972-6240 (FPL No. 114)

On page 7-37, under the column entitled "ESPECIALLY DIFFICULT TO REMOVE," "No" is changed to "Yes" for FPL No. 095. Also, two Mark Nos. are corrected by changing them from:

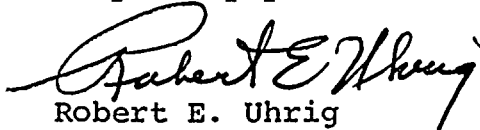
CC-14-2 to MS-649-313 (FPL No. 102)  
CC-21-5 to BF-549-7 (FPL No. 103)

In addition, Mark Nos. CH-3-54 and CH-3-54A are deleted from the Table because they have been replaced with mechanical snubbers.

On page 7-38, the note at the bottom of the page is revised to permit changes to Table 3.7-2 without prior License Amendment provided the conditions of 10 CFR 50.59 are met and the Table is eventually revised by some future amendment.

The proposed amendment has been reviewed and the conclusion reached that it does not involve a significant hazards consideration, therefore, prenoticing pursuant to 10 CFR 2.105 should not be required. A written safety evaluation is attached.

Very truly yours,

  
Robert E. Uhrig  
Vice President

REU/

Attachment

cc: Mr. Norman C. Moseley  
Jack R. Newman, Esquire

SECRET

STATE OF FLORIDA )  
COUNTY OF DADE )

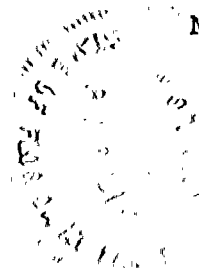
That he is a Vice President of Florida Power & Light Company,  
the Licensee herein;

Robert E. Uhrig  
Robert E. Uhrig

this 20<sup>th</sup> day of May, 1976

Notary Public, in and for the County  
of Dade, State of Florida NOTARY PUBLIC STATE OF FLORIDA AT LARGE

MY COMMISSION EXPIRES NOV. 30 1979  
BONDED THRU GENERAL INS. UNDERWRITERS



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JAN 10 1964  
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TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
001	SS-1 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
002	SS-2 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
003	SS-3 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
004	SS-4 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
005	SS-5 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
006	SS-6 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
007	SS-7 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
008	SS-8 1A	MS, Steam Gen. 1A, Elev. 62'	I	No	Yes
009	SS-1 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
010	SS-2 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
011	SS-3 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
012	SS-4 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
013	SS-5 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
014	SS-6 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
015	SS-7 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes
016	SS-8 1B	MS, Steam Gen. 1B, Elev. 62'	I	No	Yes

TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
017	1A1	RC, RCP Motor 1A1, Elev. 57'	I	No	No
018	1A2	RC, RCP Motor 1A2, Elev. 57'	I	No	No
019	1B1	RC, RCP Motor 1B1, Elev. 57'	I	No	No
020	1B2	RC, RCP Motor 1B2, Elev. 57'	I	No	No
021	RC 005-34A	RC, Reactor Bldg, Elev. 68'	A	No	No
022	RC 005-34B	RC, Reactor Bldg, Elev. 68'	A	No	No
023	RC 005-36	RC, Reactor Bldg, Elev. 68'	A	No	No
025	RC 005-12B	RC, Reactor Bldg, Elev. 80'	A	No	No
026	RC 005-12B	RC, Reactor Bldg, Elev. 80'	A	No	No
024	RC 005-12A	RC, Reactor Bldg, Elev. 80'	A	No	No
028	RC 005-55C	RC, Reactor Bldg, Elev. 80'	A	No	No
027	RC 005-55B	RC, Reactor Bldg, Elev. 80'	A	No	No
029	RC 005-62A	RC, Reactor Bldg, Elev. 80'	A	No	No
030	RC 005-89	RC, Reactor Bldg, Elev. 80'	A	No	No
031	RC 005-90	RC, Reactor Bldg, Elev. 80'	A	No	No
032	RC 005-98	RC, Reactor Bldg, Elev. 80'	A	No	No

TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
033	MS 649-319	MS, Reactor Bldg, Elev. 82'	A	No	No
034	MS 548-5	MS, Reactor Bldg, Elev. 82'	A	No	No
035	MS 1076-3164	MS, M.S. Trestle, Elev. 62'	A	No	No
036	MS 649-314	MS, Reactor Bldg, Elev. 55'	I	No	No
037	MS 649-314	MS, Reactor Bldg, Elev. 55'	I	No	No
038	MS 649-310	MS, Reactor Bldg, Elev. 50'	I	No	No
039	MS 649-304A	MS, Reactor Bldg, Elev. 30'	A	No	Yes
040	MS 548-9	MS, Reactor Bldg, Elev. 50'	I	No	Yes
041	MS 548-9	MS, Reactor Bldg, Elev. 50'	I	No	Yes
042	BF 549-7	BF, Reactor Bldg, Elev. 40'	I	No	No
043	BF 549-7	BF, Reactor Bldg, Elev. 40'	I	No	No
044	BF 549-8	BF, Reactor Bldg, Elev. 40'	I	No	Yes
045	BF 549-11	BF, Reactor Bldg, Elev. 50'	I	No	No
046	BF 549-11	BF, Reactor Bldg, Elev. 50'	I	No	No
047	BF 549-17	BF, Reactor Bldg, Elev. 36'	A	No	Yes
048	BF 661-407	BF, Reactor Bldg, Elev. 40'	I	No	No
049	BF 661-407	BF, Reactor Bldg, Elev. 40'	I	No	No

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5/20/76

TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
050	BF 661-416	BF, Reactor Bldg, Elev, 50'	I	No	No
051	BF 661-416	BF, Reactor Bldg, Elev, 50'	I	No	No
052	BF 549-17	BF, Reactor Bldg, Elev. 36'	A	No	No
053	SI 968-210	SI, Reactor Bldg, Elev. 16'	I	No	No
054	SI 968-565	SI, Reactor Bldg, Elev. 25'	A	No	No
055	SI 968-1205	SI, Reactor Bldg, Elev. 30'	A	No	No
056	SI 968-1207	SI, Reactor Bldg, Elev. 18'	A	No	No
057	SI 969-1190	SI, Reactor Bldg, Elev. 20'	I	No	No
058	SI 969-1216	SI, Reactor Bldg, Elev. 18'	A	No	No
059	SI 969-6193	SI, Reactor Bldg, Elev. 18'	A	No	No
060	SI 969-6195	SI, Reactor Bldg, Elev. 18'	A	No	No
061	MS 549-11	SI, Reactor Bldg, Elev. 18'	A	No	No
062	SI 969-6201	SI, Reactor Bldg, Elev. 18'	A	No	No
063	SI 969-6217	SI, Reactor Bldg, Elev. 18'	A	No	No
064	SI 969-6217	SI, Reactor Bldg, Elev. 18'	A	No	No
065	SI 970-1210	SI, Reactor Bldg, Elev. 33'	I	No	No
066	MS 549-11	SI, Reactor Bldg, Elev. 20'	I	No	No

TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
067	SI 970-1251	SI, Reactor Bldg, Elev. 20'	A	No	No
068	SI 971-6	SI, Reactor Bldg, Elev. 20'	I	No	No
069	SI 971-1229	SI, Reactor Bldg, Elev. 20'	I	No	No
070	SI 971-6229	SI, Reactor Bldg, Elev. 20'	I	No	No
071	SI 971-6236	SI, Reactor Bldg, Elev. 20'	I	No	No
072	SI 972-1243	SI, Reactor Bldg, Elev. 25'	A	No	No
073	SI 972-6240	SI, Reactor Bldg, Elev. 16'	I	No	No
074	SI 973-240	SI, Reactor Bldg, Elev. 18'	A	No	No
075	SI 973-6219	SI, Reactor Bldg, Elev. 36'	I	No	No
076	SI 973-6224	SI, Reactor Bldg, Elev. 18'	A	No	No
077	SI 868-64	SI, RAB, Elev. 4'	A	No	No
078	SI 868-111	SI, RAB, Elev. 4'	A	No	No
079	SI 868-163	SI, RAB, Elev. 4'	A	No	No
080	SI 868-410	SI, RAB, Elev. 4'	A	No	No
081	SI 676-67	SI, RAB, Elev. 4'	A	No	No
082	SI 676-67	SI, RAB, Elev. 4'	A	No	No
083	SI 676-105	SI, RAB, Elev. 4'	A	No	No

TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
084	SI 676-105	SI, RAB, Elev. 4'	A	No	No
085	SI 676-127	SI, RAB, Elev. 4'	A	No	No
086	SI 676-129	SI, RAB, Elev. 4'	A	No	No
087	SI 676-2481	SI, RAB, Elev. 24'	A	No	No
110	SI 676-247	SI, RAB, Elev. 30'	A	No	No
111	SI 676-2475A	SI, RAB, Elev. 30'	A	No	No
112	SI 676-4505	SI, RAB, Elev. 7'	A	No	No
113	SI 971-6236	SI, RAB, Elev. 4'	A	No	No
114	SI 972-6240	SI, RAB, Elev. 4'	A	No	No
091	SPS-417	Pressurizer Spray, Reactor Bldg, Elev, 50'	I	No	No
090	SPS-27	Pressurizer Spray, Reactor Bldg, Elev, 50'	I	No	No
092	SPS 467	Pressurizer Spray, Reactor Bldg, Elev. 80'	A	No	No
093	SPS-777	Pressurizer Spray, Reactor Bldg, Elev. 80'	A	No	No
094	CS-832-118	CS, Reactor Bldg, Elev. 125'	A	No	Yes



TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
095	CS-878-115	CS, Reactor Bldg, Elev. 18'	A	No	Yes
096	CC-1865-9	CC, Reactor Bldg, Elev. 25'	A	No	No
088	CC-1899-48	CC, Reactor Bldg, Elev. 25'	A	No	No
098	CC-1899-2208	CC, Reactor Bldg, Elev. 59'	A	No	No
089	CC-1852-6241	CC, Reactor Bldg, Elev. 25'	A	No	No
100	CC-1865-2207	CC, Reactor Bldg, Elev. 59'	A	No	No
101	CC-17-1	CC, RAB, Elev. 20'	A	No	No
102	MS-649-313	CC, RAB, Elev. 26'	A	No	No
104	CC-21-1	CC, RAB, Elev. 20'	A	No	No
103	BF-549-7	CC, RAB, Elev. 26'	A	No	No
105	CC-23-2	CC, RAB, Elev. 26'	A	No	No
106	CH-3-40	CH, RAB, Elev. 34'	A	No	No
107	CH-3-75	CH, RAB, Elev. 23'	A	No	No



TABLE 3.7-2  
SAFETY RELATED HYDRAULIC SNUBBERS\*

<u>FPL LOCATION NUMBER</u>	<u>MARK NUMBER</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION AND ELEVATION</u>	<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE (Yes or No)</u>	<u>ESPECIALLY DIFF TO REMOVE (Yes or No)</u>
108	MS-649-313	MS, Reactor Bldg, Elev. 80'	I	No	No
109	MS-649-313	MS, Reactor Bldg, Elev. 80'	I	No	No
097	MS-649-314	MS, Reactor Bldg, Elev. 80'	I	No	No
099	MS-649-314	MS, Reactor Bldg, Elev. 80'	I	No	No

\*Changes to Table 3.7-2 may be made without prior License Amendment provided that safety evaluations, documentation, and reporting are provided in accordance with 10 CFR 50.59 and that a revision to Table 3.7-2 is included with a subsequent License Amendment request.



## SAFETY EVALUATION

### Introduction

This evaluation supports a proposed amendment to Table 3.7-2, "Safety Related Hydraulic Snubbers," such that changes to the table may be made without prior License Amendment provided safety evaluations, documentation, and reporting are performed in accordance with 10 CFR 50.59.

### Discussion

The present St. Lucie Unit 1 Technical Specifications allow hydraulic snubbers to be added to safety related systems without prior License Amendment but say nothing about the possibility of replacing safety related hydraulic snubbers with some other type of seismic restraint.

Florida Power and Light Company (FPL) proposes that the specifications be amended as described in the Introduction to this Safety Evaluation so that mechanical snubbers may be used on safety related systems to replace defective hydraulic snubbers without first having to obtain permission to do so via a change to Table 3.7-2. Any replacement mechanical snubber will be properly qualified. Safety evaluations, documentation, and reporting will be provided in accordance with 10 CFR 50.59.

The proposed change will provide increased flexibility in ordering spare parts for seismic restraints. It will also permit correction of deficiencies more quickly by authorizing the use of qualified replacement snubbers without having to go through the more time-consuming license amendment process.

### Conclusion

Based on these considerations, (1) the proposed change does not increase the probability or consequences of accidents or malfunctions of equipment important to safety and does not reduce the margin of safety as defined in the basis for any technical specification, therefore, the change does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

