

NRR-DRMAPEm Resource

From: Wentzel, Michael
Sent: Tuesday, August 13, 2019 3:39 PM
To: Godes, Wyatt
Cc: Mack, Jarrett; Catron, Steve; Frehafer, Ken
Subject: St. Lucie Plant, Unit No. 2, Request for Additional Information Regarding License Amendment Request to Relocate the MOV Thermal Overload Bypass Devices (L-2019-LLA-0106)

Dear Mr. Godes:

By application dated May 20, 2019 (Agencywide Documents Access and Management System Accession No. ML19140A100), Florida Power & Light Company (FPL, the licensee) submitted a license amendment request (LAR) for St. Lucie Plant, Unit No. 2 (St. Lucie 2). The proposed amendments would modify Technical Specification (TS) to relocate the requirements pertaining to the Motor Operated Valve (MOV) Thermal Overload Protection Bypass Devices to licensee control, whereby future changes will be subject to regulatory controls of Section 50.59 of Title 10 of the *Code of Federal Regulations* (10 CFR).

The NRC's Electrical Engineering Operating Reactors Branch (EEOB) staff is reviewing the application and has identified areas where it needs additional information to support its review. The NRC staff's request for additional information (RAI) is provided below. As discussed with the licensee's staff on call on August 13, 2019, the NRC staff requests your response to the RAI within 30 days of the date of this email.

If you have any questions, please contact me at (301) 415-6459 or michael.wentzel@nrc.gov.

Sincerely,

Michael Wentzel, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST REGARDING
MOTOR-OPERATED VALVE THERMAL OVERLOAD PROTECTION BYPASS DEVICES
ST. LUCIE PLANT, UNIT NO. 2
EPID L-2019-LLA-0106
FLORIDA POWER & LIGHT COMPANY
DOCKET NO. 50-389

Requirements:

The regulatory requirements related to limiting conditions for operation are contained in the regulations at 10 CFR 50.36, "Technical specifications." Section 50.36 (c)(2)(ii) of 10 CFR requires TSs to have a technical specification limiting condition for operation for each item meeting one or more of the following criteria:

- (A) Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- (B) Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- (C) Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- (D) Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

RAI-EEOB-1

The license amendment request dated May 20, 2019, states, in part, that "the proposed change deletes TS 3/4.8.4 and Table 3.8-1 in their entirety and relocates the MOV thermal overload protection bypass devices requirements to the station's Preventive Maintenance Program." However, the license amendment request does not contain a description of the Preventive Maintenance Program, nor does the program appear to be described in the Updated Final Safety Analysis Report. Further, it is not apparent why future changes to the relocated requirements would be subject to the controls of 10 CFR 50.59. Therefore:

- a. Provide a description of the St. Lucie Preventive Maintenance Program. Further, describe how future changes made to the relocated requirements would be subject to the controls of 10 CFR 50.59.

RAI-EEOB-2

The license amendment request dated May 20, 2019, states in Section 3.0 under Criterion 3 that "the valves are not subject to repetitive cycling or prolonged periods of continuous operation that produce the elevated motor temperatures thermal overload protection is designed to prohibit."

- a. Provide the basis for this statement.

RAI-EEOB-3

The license amendment request dated May 20, 2019, states in Section 3.0 under Criterion 4 that "MOV thermal overload protection and the need to bypass the protection during accident conditions are not SSCs that industry OE [operating experience] or the St. Lucie Unit 2 PRA [probabilistic risk assessment] have shown to be significant to public health and safety." Later in that section the LAR states, "Moreover, MOV thermal overload protection is neither credited in the PRA nor is it subject to Maintenance Rule unavailability monitoring pursuant 10 CFR 50.65."

- a. Clarify what is meant by the statement that MOV thermal overload protection and/or their bypass devices are not specifically credited in the PRA for St. Lucie 2.
- b. Explain why MOV thermal overload protection is not subject to Maintenance Rule monitoring.

Hearing Identifier: NRR_DRMA
Email Number: 170

Mail Envelope Properties (BL0PR0901MB3250349C9383C2E03518ED7FE7D20)

Subject: St. Lucie Plant, Unit No. 2, Request for Additional Information Regarding License Amendment Request to Relocate the MOV Thermal Overload Bypass Devices (L-2019-LLA-0106)
Sent Date: 8/13/2019 3:39:02 PM
Received Date: 8/13/2019 3:39:02 PM
From: Wentzel, Michael

Created By: Michael.Wentzel@nrc.gov

Recipients:

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

Post Office: BL0PR0901MB3250.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	4843	8/13/2019 3:39:02 PM

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