



January 29, 2020

L-2020-018  
10 CFR 50.4


U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Annual Summary of Commitment Changes Implemented  
Without Prior NRC Notification for Calendar Year 2019

Pursuant to the guidance of NRC Regulatory Issue Summary (RIS) 2000-17, Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff, and NRC endorsed Nuclear Energy Institute (NEI) 99-04, Guidelines for Managing NRC Commitment Changes, attached is a summary of commitments that were changed in accordance with the Fleet NRC commitment management procedure during calendar year 2019.

Please contact Richard Sciscente at (772) 467-7156 if there are any questions regarding this submittal.

Sincerely,

  
Wyatt Godes  
Licensing Manager  
St. Lucie Plant

WG/rcs

Attachment

Annual Summary of Commitment Changes Implemented Without Prior NRC Notification for Calendar Year 2019		
Source Document(s)	Brief Commitment Summary	Change Summary & Bases for the Change
<p>Florida Power &amp; Light letter L-2000-157 dated November 13, 2000, Proposed License Amendments EDG Risk Informed AOT Extension Request for Regulatory Commitment</p> <p>NRC Issuance of St. Lucie Plant, Unit 1 Amendment No. 170 Regarding Diesel Generator Allowed Outage Time Extension, dated January 19, 2001</p> <p>NRC Issuance of St. Lucie Plant, Unit 2 Amendment No. 115 Regarding Diesel Generator Allowed Outage Time Extension, dated April 26, 2001</p>	<p>As committed by L-2000-157, FPL added the following four EDG and SBO cross-tie maintenance conditions to the administrative procedures for implementing the Configuration Risk Management Program and to the On-line Risk Monitor:</p> <ol style="list-style-type: none"> <li>1. If a Unit 2(1) EDG is unavailable, a Unit 1(2) EDG will be removed from service only for corrective maintenance and for a period not to exceed 72 hours.</li> <li>2. If the station blackout crosstie is unavailable, a Unit 1(2) EDG will be removed from service only for corrective maintenance and for a period not to exceed 72 hours.</li> <li>3. If a Unit 1(2) EDG is not available, the station blackout crosstie will be removed from service only for corrective maintenance and for a period not to exceed 72 hours.</li> <li>4. If a condition is entered in which both a Unit 1(2) EDGs and either the station blackout crosstie or a Unit 2(1) EDG become unavailable at the same time, FPL will evaluate the plant conditions using the CRMP.</li> </ol> <p>The commitments were subsequently summarized within the NRC's safety evaluations (SE) for St. Lucie Unit 1 Amendment 170 and Unit 2 Amendment 115. The SEs' summaries of the commitments above are followed by a statement that the licensee shall not change the above conditions without prior NRC approval.</p>	<p><u>Change Summary</u>  The two conditions (1 and 2 at left) for each unit that limit the allowed outage time for an emergency diesel generator (EDG) to 72 hours are deleted.</p> <p><u>Bases for the Change</u>  In July 2019, the NRC approved Amendments 247 (Unit 1) and 199 (Unit 2), which revised the TS for the EDGs to incorporate risk-informed completion times (RICTs). This change provides a means of extending the allowed outage times (AOTs) for the EDGs if risk is assessed and managed within specified limits. The approval of these amendments did not stipulate any limitations or restrictions on EDG allowed outage times similar to those imposed previously. The revised TS and accompanying SE supersede the previously approved changes to the TS. Therefore, elimination of the commitments that supported the previously approved TS changes and implementation of the revised TS based on the most recent SE is appropriate.</p>