January 29, 2021

L-2021-008
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 2020

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 St. Lucie commitments that were changed in accordance with the NextEra Energy Fleet NRC commitment management procedure during calendar year 2020.

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 (3 Pages)

Annual Summary of Commitment Changes Implemented Without Prior NRC Notification for Calendar Year 2020		
Source Document(s)	Brief Commitment Summary	Change Summary & Bases for the Change
Florida Power & Light (FPL) letter L-2017-210 dated December 20, 2017, Updated Final Response to NRC Generic Letter 2004-02	Upon NRC approval of WCAP-17788, Comprehensive Analysis and Test Program for GSI-191 Closure, the completed in-vessel blockage analysis for St. Lucie will be reviewed and if warranted, a reanalysis will be performed within six months following approval of the WCAP-17788 methodology.	<u>Change Summary</u> This commitment has been rescinded. <u>Bases for the Change</u> The commitment is appropriate for rescission since the NRC revised their approach to the post LOCA in-vessel debris methodology outlined in WCAP-17788. In lieu of WCAP approval, in June 2019 the NRC issued a technical evaluation report (TER) which concluded that post-LOCA debris inside the reactor vessel is of low safety significance (ML 19073A044). Additionally, in September 2019 the NRC issued guidance for demonstrating compliance with 10 CFR 50.46(b)(5) drawing upon the WCAP-17788 methodology for evaluating the effects of in-vessel debris (ML 19228A011). In a December 2019 audit report (ML 19217A003), the NRC requested supplemental information that was provided by FPL via letter L-2020-165 dated December 4, 2020, Supplement to Updated Final Response to NRC Generic Letter 2004-02. This supplement included no new commitments.

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FPL letter L-92-39 dated February 21, 1992, Generic Letter 91-11 Response.	For Unit 1: With one instrument bus inverter not connected to its associated DC bus Follow Unit 2 120 VAC Inverter Power AOTs (restore in 24 hours)	<u>Change Summary</u> Extend AOT from 24 hours to 7 days. <u>Bases for the Change</u> The time limits for inverter restoration are similar to actual Technical Specification limits that may be extended provided risk is within the limits provided by RG-1.174 and RG-1.177. The change implements a risk-informed extension of the time limits for inverter restoration. The requirements for Generic Letter 91-11 continue to be met as the change in commitment still imposes time limitations for an out of service safety related inverter. Surveillance requirements are not changed. A safety evaluation within the approved commitment change checklist assessed a single instrument bus being maintained on its bypass bus with a loss of offsite power event and a worst-case additional single failure. The impact of the instrument bus to de-energizing for 10 seconds while the associated emergency diesel generator starts and loads does not impact the ability for the reactor protection system or the engineered safety features actuation system to actuate and perform their design functions.

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FPL letter L-2016-067 dated March 29, 2016, Schedule Commitment Change to NCR Bulletin 2012-01 - Design Vulnerability in Electric Power Systems FPL letter L-2018-196 dated November 12, 2018, Revised Implementation Schedule for Open Phase Condition (OPC)	Per L-2016-067, St. Lucie Nuclear Units 1 and 2 committed to meeting the generic schedule provided in the current revision of the NEI Industry OPC Initiative -- Revision 1, dated March 2015, or any subsequent revisions issued by NEI. Per L-2018-196, St. Lucie revised the OPC implementation schedule per Revision 2 of NEI OPC Industry Initiative to extend the monitoring period before implementing the automatic trip function.	<u>Change Summary</u> St. Lucie has not implemented the automatic trip function of the OPCPS. St. Lucie has selected to use the risk-based analysis option to justify elimination of the automatic trip function of the OPCPS and rely on the alarm function and subsequent operator actions. <u>Bases for the Change</u> The most recent iteration of the NEI OPC Initiative (Revision 3) incorporates an option for plants to perform a risk evaluation under certain boundary conditions to support manual response to an OPC. This option provides alternatives to enabling the automatic isolation of OPC. St. Lucie deleted the trip function of the OPCPS and now relies on the Control Room alarms and operator manual actions upon detection of an OPC.