

licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Alternative source term calculations have been performed for St. Lucie Unit 1 that demonstrate the dose consequences remain below limits specified in NRC Regulatory Guide 1.183 and 10 CFR 50.67. The proposed change does not modify the design or operation of the plant. The use of an AST changes only the regulatory assumptions regarding the analytical treatment of the design basis accidents and has no direct effect on the probability of any accident. The AST has been utilized in the analysis of the limiting design basis accidents listed above. The results of the analyses, which include the proposed changes to the Technical Specifications, demonstrate that the dose consequences of these limiting events are all within the regulatory limits. The proposed Technical Specification changes to the RCS [reactor coolant system] operational leakage limits and to the shield building bypass leakage rate acceptance criterion result in more restrictive requirements and support the AST revisions to the limiting design basis accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not affect any plant structures, systems, or components. The operation of plant systems and equipment will not be affected by this proposed change. The alternative source term and the more restrictive proposed leakage limits do not have the capability to initiate accidents.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The proposed implementation of the alternative source term methodology is consistent with NRC Regulatory Guide 1.183. The Technical Specification changes to the RCS operational leakage limits and to the shield building bypass leakage rate acceptance criterion result in more restrictive requirements and support revisions to the radiological analyses of the limiting design basis accidents. Conservative methodologies, per the guidance of RG 1.183, have been used in performing the accident analyses. The radiological consequences of these accidents are all within the regulatory acceptance criteria associated with use of the alternative source term methodology.

The proposed changes continue to ensure that the doses at the exclusion area and low population zone boundaries and in the

control room are within the corresponding regulatory limits of RG 1.183 and 10 CFR 50.67. The margin of safety for the radiological consequences of these accidents is considered to be that provided by meeting the applicable regulatory limits, which are set at or below the 10 CFR 50.67 limits. An acceptable margin of safety is inherent in these limits.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Attorney for licensee:* M.S. Ross, Attorney, Florida Power & Light, P.O. Box 14000, Juno Beach, Florida 33408-0420.

*NRC Section Chief:* Allen G. Howe.

*Florida Power and Light Company, et al., Docket Nos. 50-335 and 50-389, St. Lucie Plant, Unit Nos. 1 and 2, St. Lucie County, Florida*

*Date of amendment request:* September 18, 2003.

*Description of amendment request:* The proposed amendments would revise the Technical Specifications (TSs) for control room ventilation systems to model NUREG-1432, Combustion Engineering Standard Technical Specifications (CE STSs). The change includes replacing the detailed filter testing surveillance requirements currently in the St. Lucie Units 1 and 2 control room ventilation systems TSs with a requirement to test in accordance with the Ventilation Filter Testing Program.

In addition, the proposed amendments would revise TS Table 3.3-6, Radiation Monitoring Instrumentation, for St. Lucie Units 1 and 2, to resolve inconsistencies due to changes associated with TS Amendments 184 (Unit 1) and 127 (Unit 2).

The proposed amendments also include minor miscellaneous editorial corrections to the TSs.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

(1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the St. Lucie Unit 1 & 2 Technical Specifications will adopt the format of the NUREG-1432 Combustion Engineering Standard Technical Specifications for the Unit 1 control room emergency ventilation system and the Unit 2 control room emergency air cleanup system. Additionally, the Ventilation Filter Testing Program of the CE STS is being adopted for the aforementioned ventilation systems. No changes are being made to the methods of testing, testing scope, or acceptance criteria.

The proposed changes also correct mode applicability requirements for the containment isolation radiation monitor (both units) and the fuel storage pool gaseous and particulate monitors (both units). These corrections are necessary in order to restore consistency with related technical specification requirements for the containment isolation system and associated fuel pool area ventilation systems.

The equipment and systems involved are associated with accident mitigation. The surveillance testing of this equipment has no bearing on the initiation of an accident previously evaluated nor on the probability of any accident previously evaluated.

Implementing the proposed changes does not significantly increase the consequences of an accident previously evaluated. The performance requirements and acceptance criteria for the affected ventilation systems are not being changed. The ability of the affected systems to mitigate the effects of postulated accidents is not diminished by the proposed changes.

The changes being proposed do not affect assumptions contained in the plants' safety analyses or the physical design of the plants, nor do they affect other technical specifications that preserve safety analysis assumptions. Therefore, operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously analyzed.

(2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed amendments do not involve any changes to the operation or performance requirements of the affected systems, nor do they involve the addition or modification of any plant equipment. As such, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

The margin of safety as defined by 10 CFR Part 100 has not been significantly reduced. There will be no decrease in the ability of the affected systems to perform their intended safety functions as assumed in accident analyses. The proposed changes do not alter the bases for assurance that safety-related activities are performed correctly or the basis for any Technical Specification related to the establishment of or maintenance of a safety margin.