



March 22, 2001

L-2001-066
10 CFR 50.4
10 CFR 50.36

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

Re: St. Lucie Unit 1
Docket No. 50-335
Date of Event: March 8, 2001
Technical Specification Special Report
Radiation Monitors Inoperable Greater Than 72 Hours
Due to Unavailable Emergency Diesel Generator

The attached Special Report is being submitted pursuant to the requirements of St. Lucie Unit 1 Technical Specification 3.3.3.1, Action b, and Technical Specification 6.9.2. This report provides notification that several plant radiation monitors were inoperable greater than 72 hours due to an unavailable emergency diesel generator. The emergency diesel generator was out of service due to preplanned maintenance.

Alternate means of radiation monitoring were implemented in accordance with the Technical Specification ACTION statement. Additionally, as described in the attached special report, FPL plans to submit a future license amendment that will eliminate the overly conservative emergency power requirements for the noncritical quality-related radiation monitors.

Please contact us if there any questions on this information.

Very truly yours,

A handwritten signature in black ink that reads 'Rajiv S. Kundalkar'.

Rajiv S. Kundalkar
Vice President
St. Lucie Plant

RSK/EJW/KWF

Attachment

cc: Luis A. Reyes, Regional Administrator, USNRC, Region II
Senior Resident Inspector, USNRC, St. Lucie Plant

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SPECIAL REPORT

I. TITLE

Plant Radiation Monitors Inoperable Greater Than 72 Hours Due to Unavailable Emergency Diesel Generator.

II. EVENT DESCRIPTION

On March 5, 2001, St. Lucie Unit 1 was in Mode 1 at 100% power. St. Lucie Unit 1 commenced on-line maintenance of the 1A emergency diesel generator (EDG) using the critical maintenance management (CMM) process. The maintenance lasted 6 days (out of a maximum Technical Specification (TS) allowed outage time of 14 days). The Limiting Condition for Operation (LCO) for TS 3.3.3.1, Radiation Monitoring, states that:

“The radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm setpoints within the specified limits.*

**The emergency power source may be inoperable in Modes 5 and 6.”*

Therefore, in order for a radiation monitor, capable of being powered from an emergency power source, to be considered OPERABLE the LCO implies that the radiation monitor must have an operable EDG. Radiation monitors RSC-26-1 (particulate iodine and noble gas monitor for plant stack exhaust), RSC-26-2 (particulate iodine and noble gas monitor for emergency core cooling system exhaust train A), RE-26-62 (radiation detector for steam dump A noble gas radiation monitor), and RE-26-63 (radiation detector for steam dump B noble gas radiation monitor) are capable of being powered from the 1A EDG. The radiation monitors were fully functional except for the capability of being powered by an EDG. ACTION statement 15 applies to these monitors and states that:

“With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable Channel(s) to OPERABLE status within 72 hours, or:

- 1) Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and*
- 2) Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.”*

On March 8, 2001, the 72-hour time period to restore the 1A EDG to operable status expired. Because the radiation monitors were fully functional and the degradation was only due to the loss of emergency power capability, the procedurally defined ACTION statement 15 alternate monitoring method consisted of continued use of the radiation monitors.

III. CAUSE OF THE EVENT

The cause for this special report was that the planned maintenance for the 1A EDG was greater than 72 hours. However, the asterisked statement within the LCO for TS 3.3.3.1 is no longer applicable and should have been removed by a previous license amendment. With the exception of the containment area radiation monitors, the radiation detectors listed in TS Table 3.3-6 are essentially single train quality-related systems, in that redundant capability is not provided by design. The containment area radiation monitors are part of a safety-related, redundant system used for initiating the containment isolation signal (CIS).

In 1989, TS amendment 103 was approved that pertained to EDG operability requirements. TS 3.0.5 was deleted and the EDG operability and support system requirements were clarified and moved to TS 3.8.1.1. As discussed in the TS BASES for section 3/4.8, Electrical Power Systems, when one EDG is inoperable, there is an additional action requirement to verify that all required systems, subsystems, trains, components, and devices are operable that depend on the remaining operable EDG. NUREG-1432, "Standard Technical Specifications for CE Plants," states that the basis for this opposite train verification is to provide assurance that a loss of offsite power, during the period that a EDG is inoperable, does not result in a complete loss of critical systems. Safety-related radiation monitors that provide critical functions have redundancy and have emergency power requirements subject to TS 3.8.1.1. However, there is no need to declare noncritical single train quality-related radiation monitors supported by the inoperable EDG inoperable. The St. Lucie Unit 1 submittal for TS amendment 103 should have deleted the asterisk and associated statement *"*The emergency power source may be inoperable in Modes 5 and 6."*

IV. ACTIONS TAKEN

Short Term:

Alternate monitoring was implemented in accordance with TS 3.3.3.1, ACTION 15.

Long Term:

St. Lucie will develop and submit a license amendment to correct TS 3.3.3.1 and delete the statement “**The emergency power source may be inoperable in Modes 5 and 6*” in order to be consistent with TS 3.8.1.1 and its BASES.

V. SCHEDULE FOR RESTORING SYSTEM

The CMM for the 1A EDG was completed on March 11, 2001. The radiation monitors were removed from the out of service log at this time.