



Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

November 21, 2001

L-2001-251  
10 CFR § 50.73

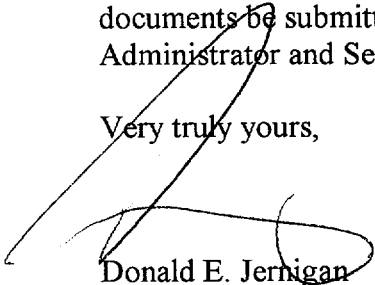
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Re: St. Lucie Unit 1  
Docket No. 50-335  
Reportable Event: 2001-008-00  
Date of Event: June 11, 2001  
Operation With Concurrent Inoperable EDG and  
Opposite Train Feature Prohibited by TS

The attached Licensee Event Report 2001-008 is being submitted pursuant to the requirements of 10 CFR § 50.73 to provide notification of the subject event.

NRC Regulatory Issue Summary 2001-05 waived the requirements that multiple copies of documents be submitted to the NRC. Therefore, hard copies usually sent to the Regional Administrator and Senior Resident Inspector will not be sent.

Very truly yours,



Donald E. Jernigan  
Vice President  
St. Lucie Nuclear Plant

DEJ/KWF  
Attachment

IE22

**LICENSEE EVENT REPORT (LER)**(See reverse for required number of  
digits/characters for each block)

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

**FACILITY NAME (1)**

St. Lucie Unit 1

**DOCKET NUMBER (2)**

05000335

**PAGE (3)**

Page 1 of 3

**TITLE (4)**

Operation With Concurrent Inoperable EDG and Opposite Train Feature Prohibited by TS

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	11	2001	2001	008	00	11	21	2001	FACILITY NAME	DOCKET NUMBER
<b>OPERATING MODE (9)</b>		1	<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</b>							
<b>POWER LEVEL (10)</b>		100	20.2201(b)		20.2203(a)(3)(ii)		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)	
			20.2201(d)		20.2203(a)(4)		50.73(a)(2)(iii)		50.73(a)(2)(x)	
			20.2203(a)(1)		50.36(c)(1)(i)(A)		50.73(a)(2)(iv)(A)		73.71(a)(4)	
			20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)		50.73(a)(2)(v)(A)		73.71(a)(5)	
			20.2203(a)(2)(ii)		50.36(c)(2)		50.73(a)(2)(v)(B)		OTHER	
			20.2203(a)(2)(iii)		50.46(a)(3)(ii)		50.73(a)(2)(v)(C)		Specify in Abstract below or in NRC Form 366A	
			20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)		50.73(a)(2)(v)(D)			
			20.2203(a)(2)(v)		X	50.73(a)(2)(i)(B)	50.73(a)(2)(vii)			
			20.2203(a)(2)(vi)			50.73(a)(2)(i)(C)	50.73(a)(2)(viii)(A)			
			20.2203(a)(3)(i)			50.73(a)(2)(ii)(A)	50.73(a)(2)(viii)(B)			

**LICENSEE CONTACT FOR THIS LER (12)**

NAME	TELEPHONE NUMBER (include Area Code)
Kenneth W. Frehafer, Licensing Engineer	(561) 467 - 7748

**COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
X	EK	NA	NA	No	-	-	-	-	-

**SUPPLEMENTAL REPORT EXPECTED (14)**

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	<b>EXPECTED SUBMISSION DATE (15)</b>	MONTH	DAY	YEAR
---	---	----	--------------------------------------	-------	-----	------

**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)**

On June 11, 2001, St. Lucie Unit 1 was in Mode 1 at 100 percent reactor power. During the performance of a surveillance run of the 1B EDG, the EDG developed a radiator leak. The 1B EDG was declared out of service and returned to service on June 17, 2001. Concurrent with the EDG inoperability, the "A" channel reactor vessel level monitoring system (RVLMS) was out of service and Action b of Technical Specification 3.8.1.1 was not entered because FPL did not consider RVLMS to be a required critical safety-related system. This TS position was documented in Condition Report 01-1237.

On October 9, 2001, FPL was informed, via the telephone, that the NRC Staff did not agree with the documented St. Lucie TS position regarding opposite train verification requirements with an inoperable EDG. The NRC believed that the literal wording of the subject TS did not support FPL's interpretation. To correct this condition, FPL submitted a TS change to align the St. Lucie TS with the CE Standard Technical Specification (STS) wording. The CE STS wording clearly allows continued operation with concurrent EDG (subject to the EDG allowed outage time) and opposite train feature inoperability, as long as the inoperable feature does not provide a critical safety function. Because the TS amendment allows operation comparable to FPL's former interpretation of the current TS, this event had no impact on the health and safety of the public.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
St. Lucie Unit 1	05000335	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	Page 2 of 3
		2001	- 008	- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**Description of the Event**

On June 11, 2001, St. Lucie Unit 1 was in Mode 1 at 100 percent reactor power. The "A" channel reactor vessel level monitoring system (RVLMS) was out of service (OOS), and the 30 day special report required by TS 3.3.8 Action 4 was submitted by FPL by letter L-2001-128 on May 31, 2001. The 1B emergency diesel generator (EDG) also had a degraded radiator on the 12-cylinder engine. As part of the operability assessment-directed compensatory measures, the monthly Technical Specification (TS) EDG surveillance was being performed on a bi-weekly frequency. During the performance of the 1B EDG augmented surveillance run on June 11, 2001, the 12 cylinder 1B2 EDG developed a radiator leak. The 1B EDG was declared OOS pending replacement of the EDG radiator cores. Replacement cores were not available on site and were procured in an expedited manner. On June 15, replacement cores for the 1B2 EDG radiator were received on site, the cores were replaced, and the 1B EDG was returned to service on June 17, 2001. Although the opposite train RVLMS was OOS concurrent with the 1B EDG, St. Lucie Unit 1 did not enter TS 3.8.1.1 Action b because FPL did not consider RVLMS to be a required critical safety-related system. This TS position was documented in St. Lucie Condition Report 01-1237.

On October 9, 2001, FPL was informed via telephone that the NRC Staff did not agree with the documented St. Lucie TS position regarding opposite train verification requirements with an inoperable EDG. The LER "discovery" clock for the June event was started at this time.

**Cause of the Event**

The cause of this event was that the literal wording of the subject TS did not support FPL's interpretation that "required" implied a critical safety-related system whose loss would result in the system's TS requiring a shutdown. FPL submitted a TS change to align the St. Lucie TS with the Combustion Engineering (CE) Standard Technical Specification (STS) wording. The CE STS wording clearly allows continued operation with an inoperable EDG (subject to the EDG allowed outage time) and inoperable opposite train features that do not provide critical safety functions.

**Analysis of the Event**

This condition is reportable under 10 CFR 50.73(a)(2)(i)(B) as operation prohibited by the facilities' TS.

**Analysis of Safety Significance**

TS 3.8.1.1 Action b states in part that:

*"With one diesel generator of 3.8.1.1.b inoperable... verify within 2 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours that:*

- 1. all required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE... "*

A literal interpretation of the subject TS did not support FPL's interpretation. The CE STS wording clearly allows continued operation with concurrent EDG (subject to the EDG allowed outage time) and opposite train feature inoperability, as long as the inoperable feature does not provide a critical safety function. FPL submitted a proposed TS amendment to implement the CE STS wording for opposite train feature

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
St. Lucie Unit 1	05000335	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	Page 3 of 3
		2001	- 008	- 00	

**TEXT** (If more space is required, use additional copies of NRC Form 366A) (17)

requirements with an inoperable EDG. Because the TS amendment will allow operation comparable to FPL's former interpretation of the current TS, this event had no impact on the health and safety of the public.

**Corrective Actions**

1. FPL submitted proposed St. Lucie TS amendments on October 17, 2001 via FPL letter L-2001-230.

**Additional Information**

Failed Components Identified

None

Similar Events

None