

L-97-19 10 CFR 50.4

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, D.C. 20555

RE: St. Lucie Units 1 and 2

Docket Nos. 50-335 and 50-389

Generic Letter 92-08
Schedule Update

# <u>Purpose</u>

The purpose of this letter is to confirm changes in the schedule for the completion of modifications to Thermo-Lag fire barriers at St. Lucie Units 1 and 2, committed to by Florida Power & Light Company (FPL) in response to NRC Generic Letter (GL) 92-08, Thermo-Lag 330-1 Fire Barriers. We have discussed the schedule changes with the NRC staff in a meeting on March 4, 1997.

#### Background

The current commitments for the resolution of Thermo-Lag 330-1 at St. Lucie Units 1 and 2 are contained in FPL letters, L-95-256 dated October 27, 1995, and L-96-211 dated August 27, 1996. This letter documents changes to the regulatory commitments for St. Lucie Units 1 and 2.

The initial St. Lucie Plant response to GL 92-08 was submitted by FPL letter L-93-96 on April 16, 1993. The submittal was supplemented in response to NRC requests for additional information (RAI) dated December 20, 1993, August 9, 1994, December 28, 1994, October 9, 1995 and November 6, 1996, and by FPL letter, L-94-33 dated February 11, 1994. Additional supplements were submitted by FPL letters, L-94-104, dated April 29, 1994; L-94-275, dated November 4, 1994; L-95-101, dated March 28, 1995; L-95-286, dated October 27, 1995; L-96-28, dated February 12, 1996; L-96-211, dated August 27, 1996; and L-96-335, dated December 19, 1996.

# **Discussion**

### St. Lucie Unit 2

FPL has revised the schedule for resolving the use of Thermo-Lag 330-1 at St. Lucie Unit 2. The outage-related Unit 2 modifications will be completed during the Spring 1997 refueling outage (SL2-10), as originally scheduled. In order to levelize design and implementation resources, and to ensure the availability of material needed to complete the Thermo-Lag

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upgrades, FPL will complete the non-outage-related modifications by the end of calendar year 1997, and complete closeout documentation and submit a final summary report, by June 30, 1998.

## St. Lucie Unit 1

Thermo-Lag modifications to St. Lucie Unit 1 were committed to be completed by the end of the St. Lucie Unit 1 steam generator replacement/refueling outage, originally scheduled to begin in the Spring 1998. As a result of additional steam generator tube degradation identified during the Spring 1996 refueling outage (SL1-14), a significant number of steam generator tubes were plugged in both St. Lucie Unit 1 steam generators. This increase in the plugging of steam generator tubes, coupled with a steam generator "run-time" analysis completed by FPL, resulted in a rescheduling of the St. Lucie Unit 1 steam generator replacement/refueling outage (SL1-15) from the Spring 1998 to the Fall 1997 (approximately six months earlier than originally planned). This schedule pullback results in FPL being unable to meet its earlier commitment to complete the St. Lucie Unit 1 Thermo-Lag modifications by the end of the St. Lucie Unit 1 steam generator replacement/refueling outage (SL1-15).

Detailed engineering evaluation and modification package development (in excess of 9000 engineering man-hours) required to design the outage and non-outage Thermo-Lag modifications are currently underway. Construction and materials requirements for the modifications will subsequently be identified. As a result of the significant resources required, coupled with the earlier start for the St. Lucie Unit 1 steam generator replacement/refueling outage, FPL has concluded that the required Thermo-Lag upgrades at St. Lucie Unit 1 can be completed most efficiently and timely under the following plan:

- In-containment and identified outage-related upgrades
   to Thermo-Lag will be completed during the St. Lucie
   Unit 1 Fall 1997 steam generator replacement/refueling outage (SL1-15);
- Thermo-Lag upgrades not requiring a unit outage for implementation will be completed during calendar year 1998.

As a contingency, FPL commits to complete any outage-related Thermo-Lag modifications which are not identified in sufficient time to be completed during the St. Lucie Unit 1 steam generator replacement/refueling outage (SL1-15) by the end of the St. Lucie Unit 1 1999 refueling outage (SL1-16), currently scheduled to begin in September 1999.

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Please contact us if you have any questions on the above schedule changes.

Very truly yours,

T. F. Plunkett

President

Nuclear Division

TFP/JAS/EJW/GRM

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