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Central File

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FLORIDA POWER & LIGHT COMPANY

July 17, 1979
L-79-193

Mr. James P. O'Reilly, Director, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Dear Mr. O'Reilly:

Re: RII:JPO
50-335
IE Bulletin 79-13

We have reviewed IE Bulletin 79-13, which requires action associated with the feedwater system at St. Lucie Unit 1. A response to Item 5 of the Bulletin is attached.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/MAS/mal

Attachment

cc: Harold Reis, Esquire
NRC Office of Inspection and Enforcement,
Division of Reactor Operations Inspection

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ATTACHMENT

Re: RII:JPO
50-335
IE Bulletin 79-13

This attachment provides the 20-day response required by Item 5 of the subject Bulletin:

a. Schedule for inspection of feedwater nozzle areas:

The Bulletin requires that the nozzle area inspection program be completed no later than September 23, 1979 (90 days from the date of the Bulletin). We have scheduled the St. Lucie Unit 1 inspection program to allow operation until October 1, 1979. The following considerations support such an extension:

1) St. Lucie Unit 1 is a relatively new plant in only its third cycle of operation. One nozzle area and portions of both feedwater lines were inspected before the plant began power operation. The results of these preservice examinations were acceptable.

2) The inspection extension is for a short period of time (approximately 2 weeks).

3) The unit is scheduled to be shutdown on October 1, 1979 for the primary purpose of performing inspections required by IE Bulletin 79-13, therefore, the actual operating time beyond September 23 will be only 8 days.

4) August and September are peak load months for Florida Power & Light Company. The short extension into October will allow us to maintain adequate reserve margin during the projected peak period.

NOTE: If system conditions permit, we plan to shutdown before October 1.

b. Adequacy of operating and emergency procedures:

Gross feedwater leaks, specifically those resulting in a loss of feedwater flow and/or loss of steam generator level, are addressed by Emergency Operating Procedure No. 0700040, "Loss of Feedwater or Steam Generator Level". This procedure outlines the steps the operator must take to maintain the steam generators as a heat sink and to conserve the condensate storage tank water inventory.

Large breaks would be immediately obvious to the operator by any of the following symptoms followed by local inspection:

a. Low-low steam generator level.
b. Low SGFP suction or discharge pressure.
c. Low condensate pump discharge pressure.
d. SGFP trip.
e. Condensate Pump trip.
f. Heater Drain Pump trip.
g. Increasing T_{avg}
h. Low hot well level.
i. CST low level.

Small breaks outside of containment would be detected by routine periodic inspection of piping and equipment by plant operations personnel.

A small feedwater break inside containment would be detected as described in item "c" below. Annunciation of this condition would be provided on the alarm panel in the Control Room. Operator action would be as dictated by Off-Normal Operating Procedure 0030131, "Plant Annunciator Summary."

The St. Lucie Plant procedures concerning recognition and response to a feedwater line break are considered adequate for the following reasons:

a. The plant staff has recently reviewed and updated the procedures in accordance with IE Bulletin 79-06B.

b. The St. Lucie procedures have been tested with the C-E Simulator for relevancy and accuracy.

c. The procedures have been re-reviewed by NRC Licensing and I&E branches.

c. Detection of feedwater leaks:

A feedwater leak in containment would be detected by the reactor cavity sump levels and flow instrumentation in conjunction with the absence of RCS leakage as determined by inventory balance calculations and the absence of containment atmosphere radiation alarms.

The sump level indication employs a float-type level detector which operating experience has demonstrated to be quite dependable. The flow measuring device for the sump was preoperationally shown to accurately detect a 1 gpm leak and in practice has detected leak rates on the order of 0.1 gpm.

Gross feedwater leaks in containment are discussed in item "b" above.