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ACCESSION NBR: 8012300216 DOC. DATE: 80/12/23 NOTARIZED: YES
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 AUTH. NAME: UHRIG, R.E. AUTHORITY AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing.

DOCKET #
05000335

SUBJECT: Forwards description of cases where plans & schedules do not coincide w/post-TMI requirements of NUREG-0737.

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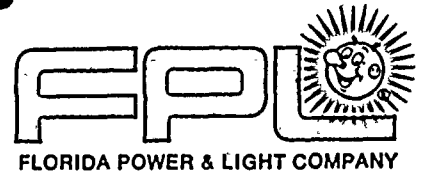
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December 23, 1980
L-80-418


Office of Nuclear Reactor Regulation
Attention: Mr. D. G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit 1
Docket No. 50-335
Post-TMI Requirements

We have reviewed your letter of October 31, 1980 which transmitted NUREG-0737. Based on that review, we have found a few cases where our plans and schedules do not coincide with those in Enclosure 1. A description of these cases and the bases for our plans and schedules are attached. We are working towards meeting all of the remainder of the requirements within the required dates, and will advise you should problems arise in meeting any of the long-term dates. We are also available to meet with you to discuss our plans and status regarding NUREG-0737 implementation.

Very truly yours,


Robert E. Uhrig
Vice President
Advanced Systems & Technology

JEM/pah

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire

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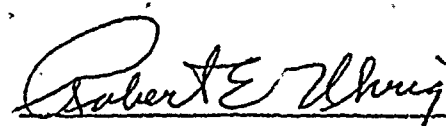
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STATE OF FLORIDA)
)
COUNTY OF DADE) SS.

Robert E. Uhrig, being first duly sworn, deposes and says:

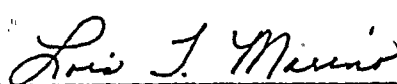
That he is a Vice President of Florida Power & Light Company,
the Licensee herein;

That he has executed the foregoing document; that the state-
ments made in this said document are true and correct to the
best of his knowledge, information, and belief, and that he
is authorized to execute the document on behalf of said
Licensee.



Robert E. Uhrig

Subscribed and sworn to before me this
23rd day of December, 1980



NOTARY PUBLIC, in and for the county of Dade,
State of Florida

My commission expires: NOTARY PUBLIC STATE OF FLORIDA at LARGE
MY COMMISSION EXPIRES AUGUST 21, 1981
BONDED THRU MAYNARD BONDING AGENCY



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ATTACHMENT

Re: St. Lucie Unit 1
Docket No. 50-335
NUREG-0737

1. TECHNICAL SPECIFICATIONS

A Proposed Technical Specification amendment has been submitted in response to an NRC letter dated July 2, 1980 (implementation of TMI Lessons Learned Category A items). These changes have been discussed with the NRC and a final version is being prepared.

We understand that additional model Technical Specifications are being developed by the NRC Staff, and that they will be issued after issuance of the final TMI Action Plan requirements package. We will consider proposing additional Technical Specification amendments following receipt and review of the final requirements package.

2. SHIFT MANNING (I.A.1.3)

We have implemented the overtime restrictions as described in the July 31, 1980 letter from D. G. Eisenhut with the clarifications in NUREG-0737 for our SRO's and RO's. It is our opinion that the overtime situation for other plant personnel involved in safety-related actions is sufficiently different such that we do not plan any additional overtime restrictions at this time.

Historically, overtime is concentrated during refueling shutdowns, major plant modifications, and periods of major maintenance, conditions which are excluded from overtime restrictions by NUREG 0737. In addition, in many cases we have limited numbers of people specializing in maintaining a complex piece of equipment, and our previous operating history shows that occasional overtime extending beyond the new NRC limits is effective and does not impair safe operations.

3. TRAINING PROGRAM (I.A.2.3)

We will submit a description of our training program and how we plan to meet this requirement by January 1, 1981.

4. ACCIDENT REANALYSIS (I.C.1)

We are pursuing resolution of these requirements through the C-E Owners Group. The new guidelines are currently scheduled to be submitted to the NRC by June 1, 1981.

5. OPERATION VERIFICATION PROCEDURE (I.C.6)

This new requirement involves interfacing activity between both our nuclear plants. As a consequence, we believe full implementation of this requirement will not be achievable until 2/1/81.

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6. REACTOR COOLANT SYSTEM VENTS (II.B.1)

We plan to provide the design description of the RCS Vent System as required by NUREG-0737. However, we will postpone development of operating procedures until such time that the design is approved. Procedures for operation will then be developed and submitted.

7. TRAINING FOR MITIGATING CORE DAMAGE (II.B.4)

We are pursuing this requirement through the C-E Owners Group. Materials for developing a training program will be available at the end of March, 1981 at the earliest.

8. SAFETY/RELIEF VALVE TESTING (II.D.1)

"As a sponsor of the EPRI PWR Safety and Relief Valve Test Program, FPL intends to comply with the requirements of NUREG 0578, Item 2.1.2. By letter dated December 15, 1980, R. C. Youngdahl of Consumers Power Company has provided the current PWR Utilities' positions on NUREG 0737, Item II.D.1 clarifications. Briefly those positions are:

- A. Safety and Relief Valves and Piping- the EPRI "Program Plan for Performance Testing of PWR Safety and Relief Valves", Revision 1, dated July 1, 1980, does provide a program that satisfies the NRC requirements. Discussion with the NRC staff and their consultants are resolving specified detailed issues.
- B. Block Valves - The EPRI Program has not formally included the testing of block valves. However, a small number of block valves have been tested at the Marshall Steam Station Test Facility. The PWR Utilities and EPRI can not provide a detailed block valve test program until results of the Wyle and CE relief valve tests are available. Therefore, a block valve test program will not be provided before July, 1981. The PWR Utilities and EPRI believe that the proper operation of the TMI-2, and Crystal River block valves and other operational experience, plus knowledge of the Marshall tests, support a less hurried and more rational approach to block valve testing.
- C. ATWS Testing - PWR Utilities will not support additional efforts for ATWS valve testing until regulatory issues are resolved. The major safety and relief valve test facility (CE) is nearing completion and some measures were taken to provide additional test capability beyond the current program requirements. The NRC should recognize that results from the current program are likely to provide most of the information necessary to address ATWS events (i.e. relief capability at high pressures)."

9. VALVE POSITION INDICATION (II.D.3)

The equipment required to provide valve position indication is currently installed and operational. Our vendor is currently performing final environmental qualification tests which are scheduled for completion by December, 1980 and a report will be transmitted as soon as practical. The



[The text in this section is extremely faint and illegible due to low contrast and scan quality. It appears to be several paragraphs of a document.]

equipment has been qualified seismically, radiologically and meets both functional and thermal aging requirements.

10. AWF SYSTEM EVALUATION (II.E.1.1)

The analyses required to document the design bases system flow requirements for the AFW (Item 3) are underway by our NSSS vendor and will be supplied upon completion.

11. AWF INITIATION & FLOW (II.E.1.2)

Equipment procurement and the design effort necessary for this modification has progressed such that we could meet the 7/1/81 implementation date for safety grade equipment. However, to ensure safe plant operation and to allow complete testing, installation will be postponed until our next refueling outage in October, 1981.

12. CONTAINMENT ISOLATION DEPENDABILITY (II.E.4.2)

We are evaluating the requirement for lowering the containment pressure setpoint for containment isolation. However, pending additional evaluation, we cannot concur with the clarification statement that 1 psi above normal operation pressure is an appropriate or necessary minimum pressure setpoint which will also preclude the spurious activation of containment isolation. Due to the implications of making a change in this setpoint, our evaluation will not be complete until 7/1/81, and modifications, if any, will be performed by 1/1/82.

13. INSTRUMENTATION FOR INADEQUATE CORE COOLING (II.F.2)

We will reschedule our upgrading commitment described in L-80-13, dated April 3, 1980 from January 1, 1981 to October 1981, the date of the next refueling outage. The equipment necessary to meet these commitments is available, but installation requires a plant shutdown. We also plan to take the opportunity of the next outage to enhance the system at the same time beyond the NRC requirements by making additional alterations to the system which will provide completely redundant indication. Performing both modifications simultaneously removes the possibility of redoing work already completed.

In addition we are participating in the C-E Owner's Group effort in evaluating reactor-water-level indication as a part of our evaluation of ICC. A detailed description of our plans for ICC will be forthcoming upon the completion of that effort.

14. AUTO TRIP OF RCPS (II.K.3.5)

We are participating in the C-E Owner's group effort in evaluating LOFT test results regarding this issue. Our submittal is dependent on the completion of this effort.

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 3. and the objectives of the project.
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 5. describes the methodology used
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 9. the document describes the
 10. conclusions of the study.

11. The first part of the document
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 13. and the objectives of the project.
 14. The second part of the document
 15. describes the methodology used
 16. in the study. The third part of
 17. the document describes the results
 18. of the study. The fourth part of
 19. the document describes the
 20. conclusions of the study.

15. SMALL BREAK LOCA ANALYSIS (II.K.3.30)

Florida Power & Light Company is participating in the C-E Owners Group to sponsor preparation of prediction of LOFT Test L3-6. Documentation of the C-E Owners Group's plans for such prediction and response to related NRC requirements is provided in a letter dated July 31, 1980 from G. E. Liebler, C-E Owners Group, to P.S. Check, NRC (Test Analysis of LOFT Small Break Test L3-6).

Because of the importance of these tests in the evaluation of the adequacy of present small-break LOCA models, we feel that it is inappropriate to consider further model documentation or changes until completion of the NRC review of these test predictions. Therefore, we will continue to participate as a member of the C-E Owners Group to support preparation of the predictions of the LOFT Test L3-6.

16. EMERGENCY PREPAREDNESS (III.A.2)

The Florida Radiological Emergency Plan for Nuclear Power Facilities includes (or will include) the Dade, Monroe, Martin and St. Lucie County radiological emergency plans. Since these plans are not completed, certain aspects of the Plan which will be submitted by FPL by January 1, 1981, must be considered subject to revision prior to the scheduled implementation date of April 1, 1981. We are currently investigating various alternatives concerning this issue and following completion of the investigation we will consult with local governmental officials to determine future action.