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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 AUTH. NAME: UHRIG, R. E. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Licensing

DOCKET # 05000335

SUBJECT: Comments on NUREG-0737 post-TMI requirements for containment pressure setpoint. Decoupling of setpoint & expense of replacing instrumentation not justified by any corresponding increase to protection of health & safety of public.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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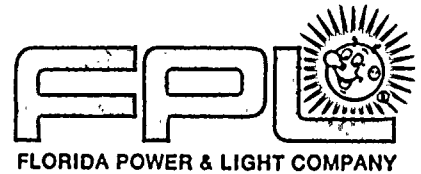
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April 9, 1981
L-81-163

Director of Nuclear Reactor Regulation
Attention: Mr. Darrell 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



NUREG 0737 contained Item II.E.4.2.5, Containment Pressure Setpoint. In our response to NUREG 0737, we committed to review the minimum containment pressure setpoint for containment isolation (CIS) and propose modifications, if any were required. This letter documents our review and conclusions.

The containment pressure history was reviewed and it was determined that the maximum normal operating pressure would be 2.0 psig. The containment isolation signal is generated by pressure transmitters PT-07-2A, 2B, 2C, and 2D (Fisher and Porter Model 50 EN 1071). These transmitters are wide range (0 to 50 psig) and have a total instrument error of 1.6 psig. Four Bistable Modules (Consolidated Control Model 6N88-1; Instrument numbers BA-103, 203, 303, and 403) receive a 4 to 20 MA DC signal from the transmitters which have been conditioned to 1-5 VDC to drive the Bistables. The Bistable output range is 0.5 to 5.0 VDC, and their setpoint is 5 psig which corresponds to 8.3% of the total output range. The four Bistables are combined in a two out of four logic that initiates containment isolation actuation. The allowance to account for Bistable tolerances plus a certain margin to preclude inadvertant containment isolation is 1.4 psig. The total of operating expected containment pressure and instrument tolerance and error yield a setpoint equal to the existing setpoint of 5 psig. Any reduction in the existing setpoint would require replacement of the existing switches.

The Technical Specifications allow a maximum containment pressure of 2.4 psig. The bases for this limit is to provide an initial containment pressure which would limit the accident analyses maximum pressure to within the containment's design value. Therefore the existing setpoint already contains a .4 psig margin, as well as the conservatisms built into the safety analyses.

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It is our position that the disruption to plant operation, the decoupling of containment pressure setpoint for CIS and SIAS (presently both at 5 psig), and expense of replacing the existing instrumentation is not justified by any corresponding increase to the protection of the health and safety of the public.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JEM/mbd

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

THE
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IN SENATE
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