REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8104160189 DOC.DATE: 81/04/09 NOTARIZED: NO DOCKET #
FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
AUTH.NAME AUTHOR AFFILIATION
UHRIG,R.E. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

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.

DISTRIBUTION CODE: A046S COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 2
TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rqmts (OL's)

NOTES:

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
ACTION:	CLARK,R.	05	7					
INTERNAL:	A/D C&C SYS	27	1		A/D C&S ENG	22	1	
	A/D FOR TECH	32	1		A/D GEN PROJ	31	1	
	A/D LICENS	16	1		A/D M&Q ENG	23	1	
	A/D OP REACT	15	1		A/D PLANT SYS	25	1	
	A/D RAD PROT	26	1		A/D SAFETY AS	17	1	
	DEP DIR,DHFS	29	1		DIR,EM PREP	33	1	
	DIRECTOR,DE	21	1		DIRECTOR,DHFS	28	1	
	DIRECTOR,DL	14	1		DIRECTOR,DSI	24	1	
	DIRECTOR,DST	30	1		I&E	12	2	
	OELD		1		OR ASSESS BR	18	3	
	PDR	02	1		RAD ASMT BR		1	
	REG FILE	01	1					
EXTERNAL:	ACRS	34	16		LPDR	03	1	
	NSIC	04	1					

APR 17 1981

TOTAL NUMBER OF COPIES REQUIRED: LTTR 51 ENCL ~~50~~ 0

FLORIDA POWER & LIGHT COMPANY

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.

A046
S/0

P

8104160189

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

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JEM/mbd

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