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FACIL:50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.			05000389
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EISENHUT,D.G.	Division of Licensing		

**SUBJECT:** Advises that util agreed to provide justification for position that steam generator water hammer testing need not be performed on facility. Preoperational test program will verify adequacy of design.

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TITLE: Steam Generator Feedwater Flow Instability (Water Hammer) (UST A-1)

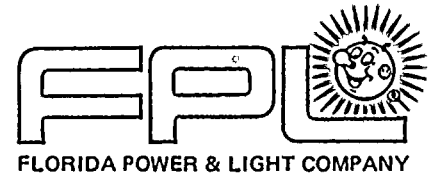
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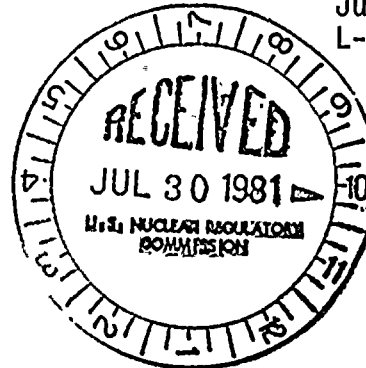
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July 27, 1981  
L-81-318

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



Dear Mr. Eisenhower:

Re: St. Lucie Unit 2  
Docket No. 50-389  
Steam Generator Water Hammer Testing

At a June 17, 1981 meeting with Olan Parr et al, Florida Power & Light Company (FPL) agreed to provide justification for our position that steam generator water hammer testing need not be performed on St. Lucie Unit 2.

A steam generator water hammer test program was conducted on St. Lucie Unit 1 with no water hammer observed. The NRC, in a Safety Evaluation Report issued February 7, 1980, concluded that steam generator water hammer was not likely to occur at that facility.

The St. Lucie Unit 1 and 2 piping arrangements are essentially identical. Isometric drawings of both units were compared, and dimensional differences were measurable in fractions (e.g., the horizontal sections of piping entering the steam generator, which are the sections of piping most likely to experience water hammer, are all equal in length (two feet long), with one section on Unit 1 3/8 inch shorter than on Unit 2).

The preoperational test program will verify the adequacy of the design. Pre-operational test procedures 2-0700091, "Auxiliary Feedwater Pumps 2A, 2B, and 2C Initial Run", and 2-0700081, "Auxiliary Feedwater System Functional and Endurance Test", will verify that the pumps meet or exceed the manufacturers head/flow curves and associated manual controls and alarms function as required, and also verify automatic operation of the system following an actuation signal. The functional test will be performed prior to hot functional testing of the unit. FPL intends to station an operator inside containment during the initial injection phase to monitor for water hammer. Also, FPL will have a vibration monitoring program during the St. Lucie Unit 2 startup, and piping vibration will be measured.

FPL is reviewing the San Onofre steam generator feed ring collapse incident and will inform you if any change in our position on steam generator water hammer testing for St. Lucie Unit 2 is required.

Very truly yours,

*Robert E. Uhrig for*

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/TCG/ah

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

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