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DOCKET #
05000335

SUBJECT: Submits clarification of intended configuration & position
 re: 811007 request for NRC interpretation of Tech Spec
 operation requirements to insure compliance. Intended action
 involves emergency busses for diesel generators.

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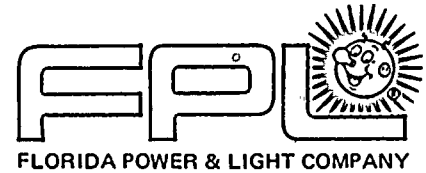
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5	5	500	kg	Weight of component
6	6	600	kg	Weight of component
7	7	700	kg	Weight of component
8	8	800	kg	Weight of component
9	9	900	kg	Weight of component
10	10	1000	kg	Weight of component



October 8, 1981
L-81-440

Office 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
Definition of Operability



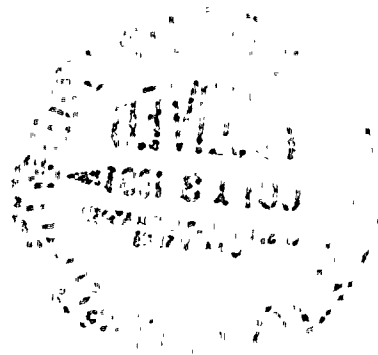
In discussions with your staff on October 7, 1981, we requested NRC interpretation of the operability requirements of our technical specifications to ensure concurrence with our position that we would in fact be in compliance with our technical specification requirements in doing the following:

Intended action: tie the A and B 4160 v emergency busses together through the normally interlocked AB bus tie breakers. This then will allow the B diesel generator with a loss of offsite power to feed the B vital train and "necessary--emergency power" (reference technical specification definition 1.6) to the A train safeguards busses during Mode 6 operations. Subsequently, repair of the A diesel generator voltage regulator and critical path TMI modifications to the B shutdown cooling system can proceed. It should be noted that in Mode 6 only 1 train of equipment is required to be operable.

To ensure the B diesel generator is not overloaded should a loss of normal (offsite) power occur, we reviewed Table 8.3-2, FSAR, page 8.3-11 "Emergency Diesel Generator Loading Sequence." Under the column for "Loss of offsite power", we find the very conservatively calculated total load per D/G to be 2232 kw (2231.75 kw). For both A and B trains/busses, 4464 kw could theoretically be loaded onto B D/G which would exceed its design continuous capacity rating of 3500 kw. As a result by tagging under administrative control 1 LPSI/Shutdown Cooling Pump, 1 Component Cooling Water Pump, 1 Intake Cooling Water Pump, and both (2) AFW Pumps, we can eliminate (330 + 376 + 492 + 610) kw or 1808 kw. Subtracting 1808 kw from 4464 kw results in 2656 kw which is only 76% of D/G continuous capacity rating of 3500 kw. We also will tag

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out the third (swing or "AB") Intake Cooling Water Pump to ensure it does not start. Although the safeguards start signals are blocked out in Mode 6, we feel it is prudent to tag out the 3 HPSI pumps and the 2 containment spray pumps to further ensure they do not start (they were not represented in this column as they would not receive a start signal on loss of offsite power). These 11 components will ensure the D/G is not overloaded should a loss of offsite power occur.

Of course, technical specifications and TMI operability verification requirements will be followed to ensure the 11 components are restored properly when needed, and we specifically note that the AB bus tie breakers will be restored and interlock operability verified (tested) upon return to service.

Our current estimate of A D/G repair time is 3 days (72 hours) or less. We cannot guarantee this of course, but we do feel it is a reasonably conservative estimate.

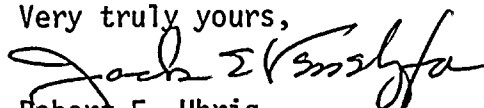
The Facility Review Group has reviewed this matter and has found that it does not involve an unreviewed safety question per 10 CFR 50.59 for the following reasons. In Mode 6, only 1 train is required OPERABLE per technical specifications; 1 train will be operable. The definition 1.6 - Operability says "all necessary (emphasis ours) --, normal and emergency power --- are also capable". The necessary 1 D/G to operate all required equipment is operable. Specification 3.0.5 which also discusses this matter is flagged as "Not Applicable in Mode 5 or 6". Tech spec 3.8.2.2 requiring certain busses be operable in Modes 5 and 6 does not list them by train even though 3.8.2.1 (for Modes 1-4) does list specific busses when the words 'both' or 'all' would suffice. Tech spec 3.8.2.2 also says "aligned to an operable Diesel Generator set" (emphasis added) rather than "their respective" operable D/G.set.

Additionally since there are no FSAR or technical specification requirements to have 2 trains operable in Mode 6, the "normal split/independent train" concept is not applicable.

In conclusion, although we feel this action does not violate the words or intent of the technical specifications, we felt it was appropriate to inform your staff of the unusual nature of the intended configuration and our position regarding its acceptability.

Please feel free to call if you have any further questions.

Very truly yours,



Robert E. Uhrig
Vice President

Advanced Systems & Technology

REU/DME/ah

