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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: CLARK, R.A. RECIPIENT AFFILIATION: Operating Reactors Branch 3

SUBJECT: Advises that Tech Spec changes real time response testing for resistance temp detectors (RTD) are not now required. No evidence of RTD time response degradation evident from testing. Addl testing proposed.

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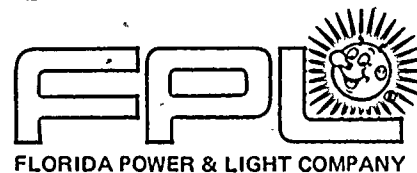
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THE UNITED STATES OF AMERICA  
DEPARTMENT OF THE ARMY  
OFFICE OF THE CHIEF OF STAFF  
WASHINGTON, D. C.

MEMORANDUM FOR THE CHIEF OF STAFF  
SUBJECT: [Illegible]

1. [Illegible]

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March 24, 1982  
L-82-114

Office of Nuclear Reactor Regulation  
Attention: Mr. Robert A. Clark, Chief  
Operating Reactors Branch #3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Clark:

Re: St. Lucie Unit 1  
Docket No. 50-335  
Resistance Temperature Detector Testing

We have reviewed your letter dated August 28, 1981 concerning time response testing for resistance temperature detectors (RTD), and have completed the evaluation of the latest RTD testing results as promised in our letter L-82-31, dated January 27, 1982. It is the opinion of FPL and our consultants that the results of those tests show that there is still no evidence of RTD time response degradation.

We have been involved in RTD Time Response testing since the program for on-line testing started. FPL, along with our consultant (Technology for Energy Corporation) and the University of Tennessee developed one of the 2 currently acceptable methods (LCSR). As stated in your letter, our previous data shows no degradation and neither does our latest data. Due to this lack of degradation and for the following reasons we see no need to propose a Technical Specification regarding RTD testing at this time. Please note that some of the following information is very new and may not have been transmitted to you.

We will replace 8 of these RTD's with new ones having better environmental qualifications at our next refueling outage (approximately spring 1983). We will of course test those 8 after startup. Since this testing requires steady state conditions and gives best results at full power, we cannot commit to testing the newly installed RTD's within 1 month after installation although we do expect to perform the test within a month. In any case, we will perform the tests as soon as conditions permit.

We will also test another set of 4 (of 16 total) safety related RTD's at that time. That will give the unit 8 new (tested one time) RTD's, 4 tested in 1978, 1979, and 1980 with no observed problem (after 2 years of operation prior to the 1st test in 1978), and 4 RTD's tested in 1978, 1979, and 1983. Should the data for the last 4 indicate a problem we would also test the other 4 "old" RTD's. Additionally we currently feel it would be very useful, for us and the industry, to test the 8 new ones again at the normal interval after installation and plan to do so.

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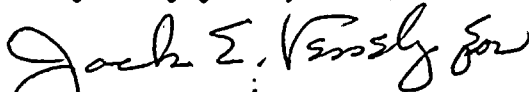
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Re: St. Lucie Unit 1  
Docket No. 50-335  
Resistance Temperature Detector Testing

We recently gained information, through the information network operated by INPO, which indicates there may be a cause for the degradation observed at some plants. EPRI report NP-1486, August, 1980 indicates that couplant (such as Never-Seez) breaks down very rapidly at temperature (within days) and possibly can cause further indicated degradation. We are told that Arkansas Nuclear One Unit 2 - ANO-2 has recently confirmed that couplant does appear to break down rapidly. Although CE, the NSSS vendor for St. Lucie and ANO-2 recommends use of couplant, St. Lucie never has used any due to a recommendation from our site CE representative/Startup Manager. An INPO representative indicated that they would evaluate this. We would recommend that the NRC also gather data and evaluate it as it might solve a problem which currently suffers from conflicting data and is demanding a great deal of both NRC and industry attention.

In summary, it is our opinion that Technical Specification changes are not required at this time for the following reasons; a Technical Specification, once established, requires significant effort both from us and the NRC to remove or change; there is currently no evidence of degradation for our RTD's; and the difference between testing 4 RTD's and all RTD's is about 6 weeks of skilled engineering data reduction and analysis. We would also like to point out that we have proposed additional testing to assure that a possible safety problem does not arise.

Very truly yours,



Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/PLP/mbd

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

