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Docket No. 50-335

Dr. Robert E. Uhrig  
 Vice President  
 Advanced Systems & Technology  
 Florida Power & Light Company  
 P. O. Box 529100  
 Miami, Florida 33152



Dear Dr. Uhrig:

This is to inform you of a modified staff position on the length of time a reactor protection system (RPS) or an engineered safety features actuation system (ESFAS) channel may be bypassed. Your Technical Specifications (TS) currently limit the inoperable channel bypass time to 48 hours.

If it can be verified that three protection system channels in two-out-of-three logic are sufficient to satisfy all protection system criteria, then one channel of a four channel system may be bypassed for a lengthy period of time with no degradation to safety. Action Statement 2 of the Enclosure 1 TS page (San Onofre - Unit 2 type) may be proposed in place of the appropriate present action requirements.

Enclosure 2 delineates the criteria which must be satisfied to ensure that three channels are sufficient for plant protection. However, we believe that it is prudent that an inoperable channel be repaired and returned to service as quickly as practicable. Action Statement 2 of Enclosure 1 would allow the flexibility of continued plant operation with an inoperable channel in bypass where it is not feasible to repair the channel (for example, if the failure is inside the containment in a location inaccessible during plant operation). The model TS, however, do place responsibility on the licensee to repair the channel as quickly as possible and in any event during the first cold shutdown after the failure has occurred.

If you have any questions on this subject, please contact your assigned NRC project manager.

Sincerely,

Original signed by  
 Robert A. Clark

Robert A. Clark, Chief  
 Operating Reactors Branch #3  
 Division of Licensing

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Enclosures: As stated

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