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ACCESSION NBR: 8206140164      DOC. DATE: 82/06/07      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.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
 CLARK, R.A.      Operating Reactors Branch 3

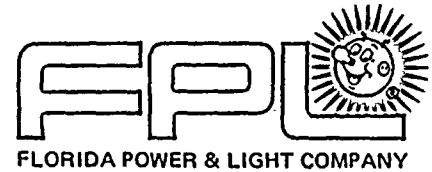
SUBJECT: Forwards responses to Questions 2-5 re overpressure mitigating sys, per 820412 request. Testing procedures verifying operability will be developed by 820801. Response to Question 1 will be provided by 820716.

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NOTES:

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	NRR/DSI	RAB	1	1	<u>REG FILE</u>	04	1	1
	RGN2		1	1				
EXTERNAL:	ACRS	09	10	10	LPDR	03	1	1
	NRC PDR	02	1	1	NSIC	05	1	1
	NTIS		1	1				





June 7, 1982  
L-82-238

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  
Overpressure Mitigating System

Florida Power & Light has reviewed your letter dated April 12, 1982, which requested additional information on the St. Lucie Unit 1 Overpressure Mitigating System. Your first question postulated a single failure event concerning the Power Operated Relief Valves. We have not yet completed our evaluation of this event. We expect to provide a response on this question by July 16, 1982.

Responses to your remaining questions are included in the attachment to this letter.

Also attached is a corrected page from our letter (L-78-223) dated June 29, 1978. The correction clarifies that the operator is to verify that PORV isolation valves are open instead of verifying that they are to open.

Very truly yours,

Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/PLP/cab

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

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ATTACHMENT

Re: St. Lucie Unit 1  
Docket No. 50-335  
Overpressure Mitigating System

Question 2

Item 4 of Branch Technical Position, RSB 5-2, requires the OMS be tested to assure operability prior to each shutdown.

- a. Is this testing being performed prior to each shutdown?
- b. How are the OMS setpoints verified prior to shutdown and reverified monthly while RCS temperature is <275°F?

Response

- a. Testing is being conducted as described in our June 29, 1978 letter (L-78-223). We will develop procedures to verify operability prior to shutdown (prior to lowering temperature to 275°) by August 1, 1982.
- b. A procedure will be developed as noted above. This test will be conducted prior to OMS use during shutdown and prior to use during the subsequent startup but will not be done more often than once every 30 days. We do not intend to conduct the test while the OMS is in operation. This may postpone the testing schedule on occasion.

Question 3

The staff requirement that a report be submitted to NRC of all OMS (PORVs or SCS safety valve) operations to relieve pressure transients in the RCS is not included in your technical specifications as amended by your letter of April 13, 1978. Address this requirement.

Response

The overpressure mitigating system (OMS) for St. Lucie Unit 1 uses the pressurizer Power Operated Relief Valves (PORV's) as the pressure relief mechanism. FPL reports all challenges to the PORV's to the NRC as required by Item II.k.3.3.d. of the NRC letter dated May 7, 1980 (Five Additional TMI-2 Related Requirements for Operating Reactors). We committed to comply with this reporting requirement in our letter (L-80-184) dated June 13, 1980. We have recently received an NRC letter dated April 6, 1982 which stated that, based on our response, TMI Item II.k.3.3. was resolved for St. Lucie Unit 1. The NRC letter also added that there would be a future NRC request to incorporate these reporting requirements into the Technical Specifications. Because we currently report PORV challenges as required, and because this item will be the subject of a future NRC request, we intend to defer action on proposing Technical Specifications until the TMI Action Plan Item request is made.

The following information was obtained from the records of the  
 Department of the Interior, Bureau of Land Management, regarding  
 the land owned by the United States in the State of California.  
 The land is situated in the County of [County Name], State of  
 California, and is described as follows:

[Detailed description of land parcels, including acreage, location, and ownership details. The text is extremely faint and largely illegible due to the quality of the scan.]

The land is owned by the United States and is being offered for sale  
 in accordance with the provisions of the Act of March 3, 1879, and  
 the Act of August 9, 1890. The land is being offered for sale  
 in several tracts, and the following is a list of the tracts:

[List of land tracts, including parcel numbers and descriptions. The text is extremely faint and largely illegible.]

The land is being offered for sale at a price of [Price] per acre, and  
 the following is a list of the names of the persons who have  
 applied for the land:

[List of names of persons who have applied for the land. The text is extremely faint and largely illegible.]

The land is being offered for sale in accordance with the provisions  
 of the Act of March 3, 1879, and the Act of August 9, 1890, and  
 the following is a list of the names of the persons who have  
 applied for the land:

[List of names of persons who have applied for the land. The text is extremely faint and largely illegible.]

Question 4

In your letter of February 28, 1977, you stated that all of your operators will have completed a review of causes of past overpressure transients by April 8, 1977.

- a. What overpressure protection training have you performed since mid-1977?
- b. How do you ensure a continued emphasis is placed on possible overpressurization situations in your licensing and retraining programs?
- c. How is this training and LER review documented?

Response

All plant originated Licensee Event Reports and Operating Experience Feedback Reports are distributed to licensed operators for review. These reviews are documented. Over pressure transients and associated protective systems are included as an integral part of the replacement operator training program.

Question 5

What is the present status of the St. Lucie Unit 1 OMS?

Response

The St. Lucie Unit 1 OMS is operational.

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