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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
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 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

DOCKET # 05000335

SUBJECT: Responds to Generic Ltr 82-10, "Post-TMI Requirements." Status provided for Items I.A.1.3.1 re limitations on overtime, I.A.1.3.2 re min shift crew & I.D.1 re control room design review.

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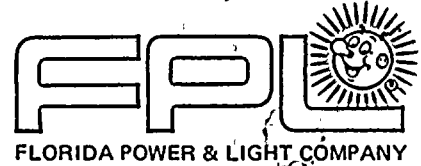
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July 2, 1982
L-82-272

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
Post-TMI Requirements
Generic Letter No. 82-10

This letter transmits to you our response to Generic Letter No. 82-10.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PKG/mbd

Attachment

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

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ATTACHMENT

St. Lucie Unit 1
Docket No. 50-335
Post-TMI Requirements
Generic Letter No. 82-10

1. SHIFT STAFFING - LIMITATIONS ON OVERTIME (I.A.1.3.1)

The NRC has accepted our present program, which is used for Unit 1 and will be used for Unit 2, in NUREG-0843, "Safety Evaluation Report, related to the operation of St. Lucie Plant, Unit No. 2", Section 13.5.1.1(1) f, page 13-34. Additionally, the NRC letter (Clark to Uhrig) dated February 4, 1982, also found our program for Unit 1 acceptable. This letter was based on Revision 2 of our Administrative Procedure. Revision 3, since issued, added a requirement and deleted nothing. We have no plans to change this NRC approved program and consider this item closed.

2. MINIMUM SHIFT CREW (I.A.1.3.2)

The minimum shift crew per page 3-9 of NUREG-0737 has been implemented at St. Lucie Unit 1. The Technical Specifications including the STA were issued in Amendment 37 dated January 19, 1982. The proposed Technical Specifications to add the second SRO (SS) were submitted in letter L-82-260 dated June 28, 1982.

3. REVISE EMERGENCY PROCEDURES (I.C.1)

Although the schedule for revised emergency procedures promulgated in NUREG-0737 required implementation by the first refueling after January 1, 1982, we understand that the commissioners are presently considering a revised implementation schedule for this item under the topic of SECY 82-111; "Requirements for Emergency Response Capabilities". Apparently, commission action on this document is forthcoming. We will respond to the results of this commission action when the revised implementation schedule has been published.

4. CONTROL ROOM DESIGN REVIEW (I.D.1)

No reply requested

5. SPDS (I.D.2)

No reply requested

6. RCS VENTS (II.B.1)

No reply requested

7. PLANT SHIELDING PT. 3 ENVIRONMENTAL QUALIFICATION (II.B.2.3)

No reply requested

8. RELIEF VALVE AND SAFETY VALVE TEST PROGRAMS (II.D.2.1)

Florida Power and Light is a participant in the Generic PWR Safety and Relief Valve Test Program implemented by the Electric Power Research Institute (EPRI) at the request of participating PWR utilities in response to the USNRC recommendations on safety and relief valve testing.

In our letter L-82-126, dated April 1, 1982 we provided you with our preliminary evaluations of the Test Program results. The initial reports themselves had been transmitted to Mr. Harold Denton by Mr. David Hoffman of Consumers Power Company on behalf of the participating PWR utilities in a letter dated April 1, 1982.

In our April 1, 1982 letter, we stated it was our intent to submit a plant specific evaluation of St. Lucie Unit 1 to you by November 15, 1982. Our schedule has been revised as follows:

- i. An evaluation of the St. Lucie 1 PORV's will be transmitted to you on or before July 9, 1982.
- ii. An evaluation of the St. Lucie 1 safety valves will be transmitted to you on or before December 30, 1982.

(a) Justification for proposed schedule

The proposed schedule is required to allow Combustion Engineering Incorporated to complete their evaluation of valve performance.

(b) Demonstration of Need for Proposed Schedule

See (a) above.

(c) Description of compensatory measures being taken in the interim

Not Applicable.

9. BLOCK VALVE TEST PROGRAM (II.D.1.3)

The PORV Block Valve Information Package dated May 1982, prepared by EPRI was transmitted to Mr. Harold Denton by R.C. Youngdahl of Consumers Power Company on behalf of the participating PWR utilities on June 1, 1982. An evaluation of the St. Lucie 1 block valves will be transmitted to you on August 16, 1982.

a. Justification for Proposed Schedule

Valve manufacturer input is required to check the torque settings on the motor operator. This is a recommendation contained in the EPRI PORV Block Valve Information Package.

b. Demonstration of Need for Proposed Schedule

The proposed schedule is required to allow the valve manufacturer time to check the torque settings on the motor operator.

c. Description of Compensatory Measures Being Taken in the Interim

Not Applicable.

10. INSTRUMENTATION FOR INADEQUATE CORE COOLING (II.F.2)

No reply required.

11. ADS ACTUATION (II.K.3.18)

Not applicable to St. Lucie Unit 1 - BWR only.

12. SMALL-BREAK LOCA ANALYSIS (II.K.3.30 & 31)

The results of the C-E Owners Group program which addresses Item II.K.3.30 which is applicable to St. Lucie Unit 1 is contained in the Combustion Engineering Topical Report CE-203P Revision 1-P "Response to NRC Action Plan Item II.K.3.30, Justification of Small Break LOCA Methods", March 1982.

It is premature at this time to provide you with a date by which we will be able to submit plant specific analyses per Item II.K.3.31. We intend at this time to await an NRC approval prior to scheduling for the completion of the task.

13. STAFFING LEVELS FOR EMERGENCY SITUATIONS (III.A.1.2)

All positions identified in the Emergency Plan as "On-Shift" will be manned continuously during OPERATING MODES 1 through 4. During OPERATING MODES 5 and 6, (cold shutdown and refueling respectively) the plant Technical Specifications identify a reduced minimum shift crew composition.

Augmented staffing identified as "30 minute" and "60 minute" requirements will be discussed in subsequent correspondence with the Regional Administrator of NRC Region II.

14. UPGRADE EMERGENCY SUPPORT FACILITIES (III.A.1.2)

An Operational support Center (OSC) is provided, on-site with adequate space for personnel, communications, and provisions for equipment and supplies.

The Technical Support Center (TSC) as described in previous correspondence (FPL letters L-81-239, dated June 6, 1981 and L-81-441, dated October 8, 1981) has been completed.

The floor plan of the Emergency Operations Facility (EOF) has been developed. Due to projected procurement and construction schedules, the October 1, 1982, schedule cannot be met. The upgraded EOF should be completed by October 1, 1983. The location, as specified in FPL letter L-81-441, has been changed to a new site at our Midway substation (approximately 10.5 miles west of the Plant). Until completion of the EOF, our interim facility will remain available for use.

15. METEOROLOGICAL DATA (III.A.2.2)

The schedule for meteorological data upgrade promulgated in NUREG-0737 required implementation by October 1, 1982. It is our understanding that the Commission is considering approval of SECY 82-111, "Requirements for Emergency Response Capabilities." We currently meet the meteorological data requirements described in the SECY 82-111 document.

