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 AUTH. NAME: URRIG, R. E. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Responds to 820701 request for info re pressurizer safety valves & power operated relief valves per NUREG-0737 Item II, D.1, C-E owners group EPRI test program in progress. Final report will be provided by 821230.

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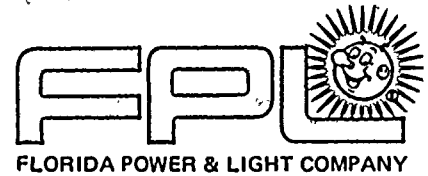
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July 9, 1982

L-82-277

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
 NUREG-0737 ITEM II.D.1
PWR Relief and Safety Valve Testing

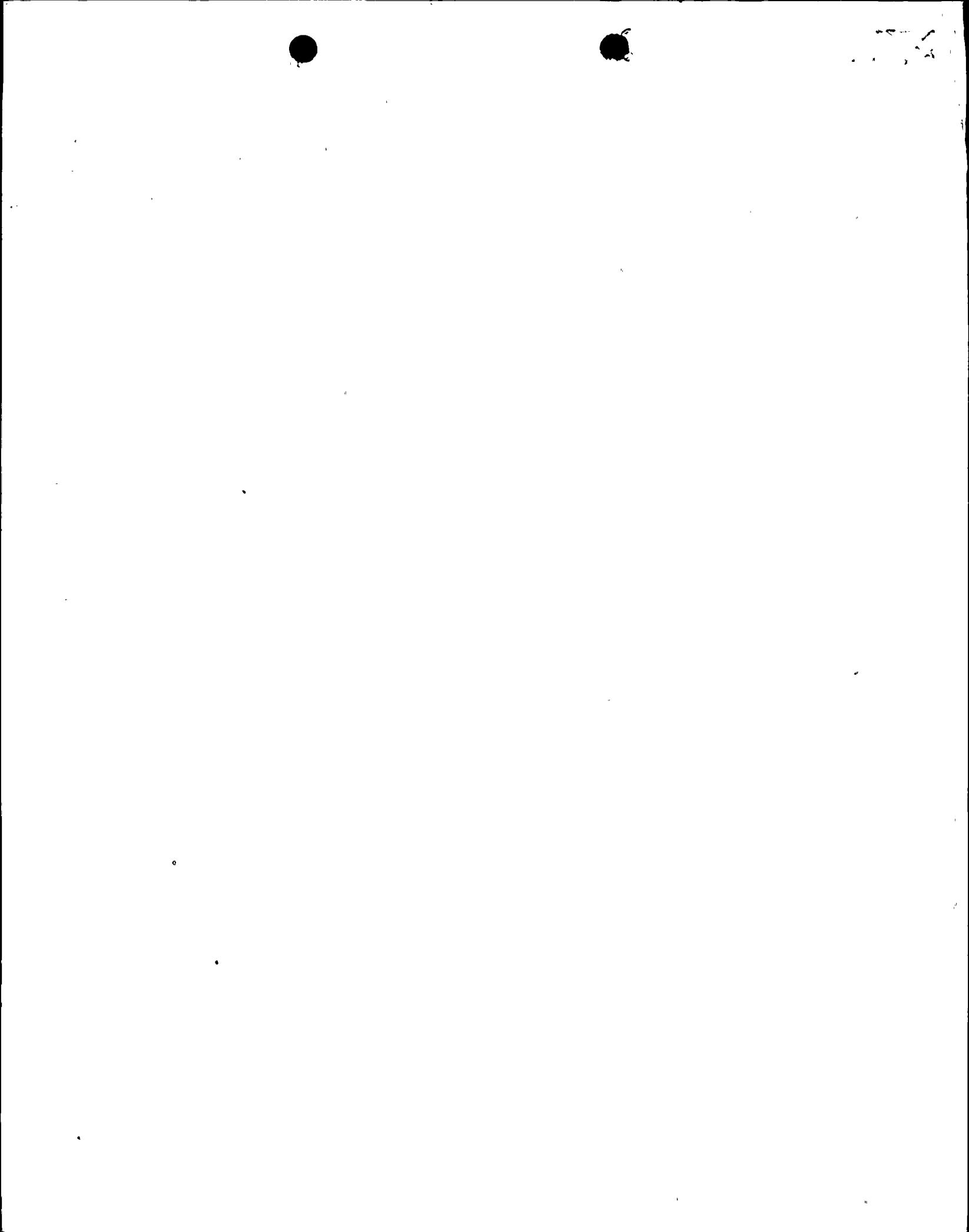
The purpose of this letter is to provide the Florida Power and Light response to the July 1, 1982, NRC request for a submittal that addresses the functionality of the pressurizer safety valves and power operated relief valves (PORVs) that are installed in the St. Lucie Unit #1 system. Item II.D.1.A of NUREG-0737 required that utilities operating and/or constructing Pressurized Water Reactor (PWR) power plants provide evidence, supported by test, of safety and relief valve functionality. In response to these requirements, the Electric Power Research Institute (EPRI) implemented a generic test program on behalf of the PWR utilities. Florida Power and Light has been a participant in the EPRI program. The NRC Generic letter 81-36 dated September 19, 1981, contains a schedule for the submittal of test results and the submittal of plant-specific reports. In accordance with this schedule, results of the EPRI program, summarized in various EPRI reports, were forwarded to the NRC on April 1, 1982, in parallel with distribution to the participating utilities. Florida Power and Light Company referenced this submittal as applicable to St. Lucie Unit 1 in our letter L-82-126 also dated April 1, 1982.

In order to facilitate an expeditious evaluation of the test data, the utilities operating and constructing Combustion Engineering (C-E) designed plants have, through the C-E Owners Group, requested that C-E implement a program to evaluate and apply the EPRI test results. The C-E Owners Group program was subsequently initiated in April, 1982, and is currently in progress. Florida Power and Light is a participant in this program.

The approach being applied by the C-E Owners Group is to show that particular EPRI tests were directly representative of plant-specific safety and relief valve models and valve installations, and that acceptable valve operation was demonstrated. The portion of the program related to PORV's has already

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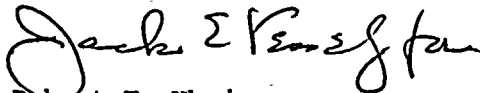
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been completed. Accordingly, C-E report CEN-213, entitled "Summary Report on the Operability of Power Operated Relief Valves in C-E Designed Plants," is being forwarded separately to the NRC by Mr. Kenneth P. Baskin, Chairman of the C-E Owners Group. Florida Power and Light considers report CEN-213 to provide the required information on PORV operability for St. Lucie Unit #1.

With regard to the evaluation of safety valves, our review of the EPRI tests has determined that the valve and installations used in St. Lucie Unit #1 were represented in the EPRI program and the test conditions enveloped the range of fluid conditions recommended by NUREG-0737. The valve discharge for St. Lucie Unit #1 is limited to steam conditions, and the valves are installed on short inlet pipes extending from the pressurizer. This type of arrangement and the steam condition has been shown in the EPRI program to be the most optimum for the valves to perform their function. Although there is no safety concern, future valve adjustments may be beneficial to assure optimal performance. Currently, detailed plant-specific evaluation and application of the EPRI data is being performed as part of the Owners Group progress. In addition, input from the valve manufacturers is being requested. That information is expected to be received during the third quarter of 1982, and will then be incorporated into the C-E evaluation. If valve adjustments are necessary, they will be identified in the C-E evaluation based on performance demonstrated by the EPRI tests. The results will be presented in a C-E Owners Group report that is scheduled for completion in December, 1982. Since Florida Power and Light is a participant in the program, the operability of safety valves in the St. Lucie Unit #1 system will be addressed by this report. Currently, our intent is to provide you with the final report, which will serve as our final submittal, by December 30, 1982. This date is six weeks later than the November 15, 1982 completion date we provided you in our April 1, 1982 letter.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU/PKG/JDR/mbd

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

