

ATTACHMENT 1



October 8, 1982
L-82-434

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 #2
DOCKET NO. 50-389
OUTSTANDING WORK ITEMS

Ref: Florida Power & Light Company Letter No. L-82-168 dated May 4, 1982

Attached please find a list of engineering and construction items that are not expected to be completed at core load, and justification for operation of St. Lucie Unit #2 prior to completion of these items. This list includes all items that were listed in our May 4, 1982 letter, and any applicable revisions thereto. Also included are additional items that were not included in our initial submittal. We are submitting this for your review and comment.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/RS/JES/jk
Attachment

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

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8210130301 821008
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The following items will not be completed by Core Load. Each item will include a short description, the reason that it is not complete, the schedule for completion and the justification for operation until it is complete.

I. NUREG-0737 ITEMS

I.D.I. Control Room Design Review (Meter Face Color Coding)

H FEB (SER 16)

ECD: 1st REFUEL

- A. Control board meters in the control room will have their scale faces color coded to reflect normal operating ranges.
- B. The final color coding of the control board meter scales will not be complete by Core Load. A series of negotiations with the instrument manufacturer has recently concluded requiring FP&L to perform this task in-house. This late contractual difficulty leaves insufficient time to complete the final fix on all designated meter faces prior to receipt of an operating license.
- C. The final color coding of meter scales will commence as soon as engineering reviews of meter qualification get underway. It is anticipated that a large percentage of the control room meters will have their scales color coded prior to fuel loading. All meter faces designated to be range coded will be color coded prior to startup following the first refueling outage.
- D. As an interim measure, a temporary method of color coding the scale faces of the subject meters will be utilized until the final scale of color codings are complete. This interim measure will comprise a color coding that is affixed to the outside of the meter face glass cover. In this manner, the operators will have color coded meter scales for those designated control board meters prior to fuel load. The temporary markings will be removed as the final scale codes are applied to each meter. This application of color coding will allow the control room operators to quickly ascertain whether a given parameter is well within the normal operating range. The use of temporary interim color coding serves to provide this same method of comparison until the final markings are applied. FP&L has concluded that reactor operation with this interim meter face color coding does not increase the risk to the public and is therefore justified.

HFEB (LAPINSKY)

I.D.2 Safety Assessment System including the Safety Parameter Display System

ECD: 1st REFUEL

Status remains the same as identified in FP&L letter L-82-168 with the exception that a majority of the system will not be installed by Core Load. The installation completion date of first refueling remains the same.

II.B.1 Reactor Coolant Gas Vent System

ISB (LIANG)

ECD: 3/83

Status remains the same as identified in FP&L letter L-82-168.

II.B.2 Plant Shielding (Motor Operated Valves)

DAB (SERBU)

ECD: 8/83

- A. This design feature provides sufficient shielding to allow operation of the emergency systems that prevent release of significant amounts of radioactive material following an accident.
- B. All portions of this requirement will be completed by Core Load except for the electrical craft activities associated with the motor operators on four valves (V-3432, V-3444, I-MV-07-03 & I-MV-07-04). These motor operators will allow remote manual operation of four valves in the auxiliary building that could be in a radiation area following an accident. Connection of these motor operators will not be complete because of extensive demand on electrical construction trades that are required to complete all systems essential for Core Load.
- C. This requirement will be completed 8 months after Core Load. The remainder of this work can be completed during plant operation without causing undue interference with operating routine.
- D. The installation of remote operation capability for these valves is provided as a backup to existing system isolation capability and therefore operation of these valves is not required following an accident similar to TMI. These motor operators were provided to enhance the operational flexibility but are not required to be actuated for safe shutdown or accident mitigation. Since safe operation of the plant is not dependent on operation of these valves, reactor operation prior to the completion of this item is justified.

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II.B.2 Plant Shielding (ECCS Area Sump Pumpback Modification)

- A. This system modification allows pumping of the ECCS sump inventory into the containment building. This system serves to remove any small amounts of radio-

active leakage that may accumulate in the auxiliary building ECCS sump following an accident and transports this inventory to the reactor building where it is isolated and contained.

- B. This modification was provided to reduce the overall exposure to plant personnel. All of the system components, with the exception of the electrical connections to the motor operated valves, will be completed by Core Load. The critical demand on electrical construction trades has necessitated that systems of higher priority be completed first.
- C. This design modification will be completed prior to exceeding 5% power.
- D. Operation of the plant below 5% power without the pumpback system modification is acceptable for the following reasons:

ECCS sump pumpback without this system modification will not require personnel access in any high radiation area. St. Lucie Unit 2 existing plant design precludes the transfer of radioactive fluid from the containment into the RAB. This is accomplished by providing a containment isolation upon high radiation inside containment. The only source of leakage of potentially radioactive fluid in the RAB will originate from the pumps and valves used for recirculation. This leakage will be contained in ECCS rooms, which are radiation controlled areas.

II.B.3 Post Accident Sampling System

- A. This system would allow low exposure sampling of reactor coolant and containment atmosphere following an accident.
- B. All hardware for this system is on site and undergoing installation but will not be completely installed by Core Load. Relatively recent delivery of hardware and critical demand on electrical construction trades have necessarily delayed the final connection.
- C. A realignment of priorities and a detailed indepth review of the construction schedule has resulted in improvement to the scheduled completion date for this system. This system will be complete and operational prior to exceeding 5% power.

CHEB(WITT)

ECD: 3/83

- D. "Completion of the Post Accident Sampling System is not essential prior to operation above 5% power because only small quantities of the radionuclide inventory will exist in the reactor coolant system and therefore will not affect the health and safety of the public." (ref. NUREG-0787, Safety Evaluation Report related to the operation of Waterford Steam Electric Station Unit No. 3, July, 1982). Capability to promptly obtain reactor coolant samples in the event of an accident will be demonstrated prior to exceeding 5% power operation.

II.E.1.2 Automatic Initiation of Auxiliary Feedwater

ICSB (STEVENS)

ECD: 3/83

- A. This system ensures that the auxiliary feedwater system is automatically actuated when it is needed and therefore does not rely on operator action.
- B. The auto initiation circuitry will be in place by Core Load. The electrical tie-ins will not be complete at Core Load because of heavy demand on the electrical construction trades which is the critical trade for plant system completion. The electrical portion will be the only portion of this item that will not be complete by Core Load.
- C. This system will be completely installed and fully operational prior to initial criticality. The system completion will support steam generator water hammer testing prior to critical operations. Since the auto initiation circuitry will not be completed until just prior to initial criticality, FP&L proposes that the steam generator water hammer testing be performed during post Core Load hot operations testing but prior to initial criticality.
- D. Since this system will be completely installed and functional prior to any critical operations, FP&L feels that a delay of this system post Core Load but prior to initial criticality is justified. This represents an improvement to the construction completion date specified in FP&L letter L-82-168.

II.F.1.D Radiation Monitors

ZAB (SERBU)

ECD 3/83 - 1st REFUEL.

- A. The NUREG-0737 required high range in containment radiation monitors and high range effluent monitors for post accident monitoring. These monitors would be capable of reading much higher than normal levels of radiation that could occur if an accident took place that severely damaged the reactor core.

B. These high range monitors will not be electrically energized to support Core Load. However, the monitors themselves will be physically installed. The relatively recent engineering change and short procurement interval has not allowed sufficient time to fully incorporate these items into a reasonable construction schedule. This fact, combined with tight utilization of the electrical trades, precludes completion by Core Load. The following is a list of monitors affected:

- i) In containment high range
- ii) Atmospheric Steam dump exhaust
- iii) Plant Vent Stack high range

C. The in containment high range monitors, atmospheric steam dump exhaust and plant stack high range monitors will be installed and operational prior to exceeding 5% power operation.

D. Reactor operations prior to final hookup is justified since these monitors do not perform any control function and they also do not provide signals which will actuate safety systems. The time period between Core Load and monitor hookup is relatively short and the following is the proposed interim alternative:

- i) Two safety related gamma sensitive radiation monitors (with range of 10 to 10⁷ mr/hr) located outside containment and mounted on the shield building at el. 82' could be referenced by the operators to determine in containment radiation. These monitors will not be over-ranged by the worst case accident. A procedure has been developed to convert these radiation monitor readings to in containment radiation levels. In addition to these two monitors, there are four safety related in containment radiation monitors with range of 10 to 10⁷ mr/hr.
- ii) Implementation of atmospheric steam dump exhaust and plant vent stack high range monitors assures that adequate accident monitoring instrumentation is available before the reactor is operated at any appreciable power level. Therefore completion of this item prior to exceeding 5% power will not affect the health and safety of the public.

Radiation Monitoring System Computer

- A. The process and effluent radiation monitoring system is a digital computer based system consisting of dual computers.
- B. Due to lack of appropriate space to locate the computers, only one computer will be installed prior to Core Load.
- C. At the first refueling outage the existing computer will be relocated to a suitable location which will accomodate the addition of the second computer.
- D. The Class IE radiation monitors have additional dedicated readout and control modules. The modules are independent of the computer system and are located in the control room. They will provide the required information to the operators in the event the computer fails. Operation of the radiation monitoring computer system is not required for safe shutdown or accident mitigation. Therefore, FP&L feels that reactor operation prior to the installation of the second computer is justified.

II.F.2 Instrumentation for detection of Inadequate Core Cooling

- A. This instrumentation package will provide the Reactor Operator with continuous indication of the progression to and away from Inadequate Core Cooling.
- B. This instrumentation package will not be fully operational prior to Core Load.
- C. The system will be operational prior to any sustained power ascention. The following is a more detailed schedule:
 - 1) All core exit thermocouples (CET) will be installed and readable in the final totally safety grade system, including the QSPDS cabinets, by initial criticality. As a target a minimum of four CET's/QUADRANT will be functional by Core Load and readable from the QSPDS cabinets.
 - 2) The instrumentation necessary to monitor and display subcooling margin will be functional in the QSPDS cabinets by initial criticality.

25B (HUANG)

ECD:3/83 - 6/83

3) The heated junction thermocouples (HJTC) will be functional in the QSPDS cabinets by June, 1983.

D. The above installation schedule was agreed to by FP&L and the NRC Staff. This time table is justified since this system does not mitigate any accidents and serves as a centralized location for already existent data.

II. FSAR Review Items

Low Flow Alarms on Safety Injection Pump

Status of this item remains the same as identified in FP&L letter L-82-168.

Waste Management System Pump Cutout

A. This engineering modification incorporates the automatic shutoff of the waste management condensate and boric acid condensate pumps prior to the level reaching the overflow nozzle of the Primary Water Storage Tank (PWST).

B. This design modification will be implemented subsequent to plant start-up but prior to the completion of the first refueling outage. This schedule was deemed necessary due to the higher priority items that are presently being installed by the electrical construction forces.

C. The design modification will be completed fourteen (14) months after Core Load.

D. The modification, which was added as a result of the FSAR review, requires a revision of the electrical design of the existing Waste Management System. This modification does not require any revision to the existing valves or piping layout.

The system that will be complete at Core Load will incorporate a high level alarm that will alert the plant operator to terminate filling the tank. Moreover, the radiological effects due to a complete overflow of the primary water tank would be negligible due to low radioactivity concentrations in the primary water tanks. Therefore, reactor operation without automatic cutout is justified.

RSB (LIANG)
ECD: 12/83
SER SECT. 54.3

ETSIB (LEE)
ECD: 1st REFUEL
SER SECT 11.2

ETSB(LBE)
ECD: 3/84
SER 11.2

Refueling Water Tank (RWT) Overflow

- A. This modification causes the Low Pressure Safety Injection pump discharge to the refueling water tank to be automatically isolated upon receipt of a high water level alarm in the Refueling Water Tank and thus precludes tank overflow.
- B. This will not be completed prior to Core Load because of excessive demand on the electrical construction trades. This has necessitated that systems of higher priority be completed ahead of this modification.
- C. This modification will be completed 14 months after Core Load.
- D. The portion of the Refueling Water Tank overflow system that will be installed prior to core Load will incorporate a high level alarm that will alert plant operator to terminate the Refueling Water Tank fill operations. The low pressure safety injection pumps, do not transport radioactive fluid to the Refueling Water Tank until after a refueling outage. Therefore, incorporation of this design change prior to first refueling does not affect plant safety during this interim period.

ASB(RIDGELY)

Second Fuel Pool Heat Exchanger

ECD: 1st REFUEL
SER SECT: 9.1.3

In FP&L letter L-82-168 FP&L stated that the Second Fuel Pool Heat Exchanger was "in place". The correct physical location of this heat exchanger is on site versus "in place". However, the status and schedule remain the same as identified in the above letter.

ETSB(LEE)

Concentrator Bottoms Tank

ECD: 1st REFUEL
SER SECT: 11.2

Status of this item remains the same as identified in FP&L letter L-82-168.

Ductility Factor Reanalysis

SEB(POLK)

ECD 1st REFUEL

Status of this item remains the same as identified in FP&L letter L-82-168.

Diesel Generator Lube Oil Modifications

PSB(GIARDINA)

ECD: 1st REFUEL
SER SECT 9.5.7

Status of this item remains the same as identified in FP&L letter L-82-168.

PSB(GIARDINA) Diesel Generator Vibration of Instruments
SER SECT: 9.5.4.1 Status of this item remains the same as identified
ECD: 1ST REFUEL in FP&L letter L-82-168.

PSB(GIARDINA) Plant Sound Powered Communications
ECD: 1ST REFUEL Status of this item remains the same as identified
SER SECT: 9.5.2.1.D in FP&L letter L-82-168.

PSB(CHOPRA) Regulatory Guide 1.63
ECD: 1ST REFUEL Status of this item remains the same as identified
SER SECT 8.4.3 in FP&L letter L-82-168.

PSB(CHOPRA) Regulatory Guide 1.75
SER SECT 8.4.2 Status of this item remains the same as identified
ECD: 1ST REFUEL in FP&L letter L-82-168.

POSITION ON Regulatory Guide 1.97
THIS ITEM IS WRITTEN Status of this item remains the same as identified
ISSER 2 in FP&L letter L-82-168.

GLB(SKELTON) Security System
YET TO BE DETERMINED As discussed in FP&L letter L-82-168, the status of
plant physical security will be the subject of
separate correspondence.

CHEB(STANG) Fire Protection
SER SECT: 9.5.1 1) Fire Barriers, Seals and Dampers
ECD: 1ST REFUEL a. Fire barriers, seals and dampers provide
separation between redundant safe shutdown
equipment in accordance with the requirements
of Appendix "R".
b. As a result of a series of negotiations with
the NRC staff, the final selection of dampers,
seals and fire barriers was completed in the
second quarter of 1982. This relatively recent
engineering change has not allowed sufficient
time to fully incorporate this item into a
reasonable construction schedule. Therefore,
these items will not be completed prior to Core
Load.

- c. These barriers, seals and dampers will be fully installed prior to completion of the first refueling outage.
- d. Such fire protection features as a fully supervised smoke detection system, complete area coverage by hose stations and portable fire extinguishers and the use of fire retardant cables and construction materials will provide protection prior to completion of the aforementioned items. These features, in conjunction with a strict control of combustibles and a surveillance program for safety related areas, will provide an adequate level of fire protection during the period required for completion of the barriers, seals and dampers. This surveillance program will require that the fire areas of the Reactor Auxiliary Building, exclusive of the control room, be inspected at least once every 2 hours for potential fire hazards.

CHEB (STRONG)
 SER SECT 9.5.1
 ECD : 1st REFUEL

2) Sprinkler Systems

- a. These sprinkler systems are provided to suppress and prevent the spread of fires in the heavily cabled safety related areas in the Reactor Auxiliary Building.
- b. The installation of the sprinkler systems was the subject of discussion between FP&L and the NRC staff and was not finalized until the second quarter of 1982. The late incorporation of this change coupled with the complexity of these systems will cause this item to be incomplete at Core Load.
- c. These systems will be fully installed prior to the completion of the first refueling outage.
- d. Such fire protection features as a fully supervised smoke detection system, complete area coverage by hose stations and portable fire extinguishers and the use of fire retardant cables and construction materials will provide a large measure of protection prior to the completion of the sprinkler system. In addition a surveillance program will require that the fire areas of the Reactor Auxiliary Building, exclusive of the control room, be inspected at least once every 2 hours for potential fire hazards.

DSB (STANG)

SER SECT: 9.5.1

ECD: 1st REFUEL

3) Additional Smoke Detectors

- a. Smoke detectors are being provided throughout the plant to provide early fire warning capability.
- b. Additional smoke detectors will be provided in the Component Cooling Water Building, the Control Room, the Battery Rooms and ECCS B Exhaust Fan room to enhance present design. These additions were agreed to during a site audit conducted in May of 1982. As a result of the late incorporation of this change, the additional detectors will not be installed prior to Core Load.
- c. These additional detectors will be fully installed prior to the completion of the first refueling outage.
- d. The Component Cooling Water Building contains a very low concentration of combustibles and smoke detectors are presently located at the ceiling of this building. The control room is continuously manned and presently provided with smoke detection capability. The battery rooms and ECCS B Fan room contain insignificant insitu combustibles and are totally isolated by three hour barriers. The addition of smoke detectors serves to enhance the existing design. Therefore, FP&L feels that adequate protection is provided until the installation of the additional detectors.

4) Cable Protection

- a. Cable protection is provided to ensure that a single fire will not cause the loss of redundant safe shutdown functions.
- b. The affected cables to be relocated or to be provided with approved enclosures were not identified until the first quarter of 1982. The late incorporation of this change and the retrofit of already installed cables will cause this change to extend beyond Core Load.
- c. These cable modifications will be completed prior to the completion of the first refueling outage.

- d. Such fire protection features as a fully supervised smoke detection system, complete area coverage by hose stations and portable fire extinguishers and the use of fire retardant cables and construction materials will provide protection prior to completion of the cable modifications. These features in conjunction with a strict control of combustibles and a surveillance program for safety related areas, will provide an adequate level of fire protection during the period required for the implementation of these changes. This surveillance program will require that the fire areas of the Reactor Auxiliary Building, exclusive of the control room, be inspected at least once every 2 hours for potential fire hazards.

CHRB (STANG)
SER SECT: 9.5.1
CD: 3/83

Reactor Coolant Pump Lube Oil Collection System

- a) This system contains and collects potential leakage of lube oil from the Reactor Coolant Pumps.
- b) The late delivery of hardware and the unavailability of construction craft manpower will cause this item to extend beyond Core Load.
- c) This system will be installed prior to initial criticality.
- d) Installation of the RCP Lube Oil Collection System after Core Load but prior to initial criticality is justified since reactor operation will not occur prior to initial criticality.

CHRB (STANG)
SER SECT: 9.5.1
CD: 1st REFUEL

Additional Battery Pack Lighting

- a. Battery pack lighting is provided to illuminate the access and exit routes throughout the Reactor Auxiliary Building in the event of a fire and loss of emergency lighting.
- b. The installation of additional battery packs to enhance the present design was a subject of discussion between FP&L and the NRC staff and was not finalized until the second quarter of 1982. The late incorporation of this change coupled with the excessive demand on electrical construction trades will preclude this item from being completed prior to Core Load.

- c. These additional packs will be fully installed prior to the completion of the first refueling outage.
- d. The essential areas of the plant are presently provided with redundant diesel-generator backed normal emergency lighting. The present plant design already incorporates a large number of battery packs for emergency lighting and these additional battery packs serve to enhance the present design. The diesel generator backed normal emergency lighting in conjunction with existing battery packs will provide an adequate degree of protection prior to the installation of the additional packs.

Boron Dilution Alarm

- A. The boron dilution alarm, provided in the control room, alerts the operating staff of a boron dilution event.
- B. The boron dilution alarm is presently on hold at St. Lucie Unit 2.
- C. At the present time there is no scheduled implementation date for the boron dilution alarm.
- D. The NRC position as cited in their letter, dated April 26, 1982 (Clark to Dr. Uhrig, Docket 50-335), to St. Lucie Unit 1 is also applicable to Unit 2 since the two units are virtually identical in this particular aspect. In the enclosure of the above letter the NRC states the following: "We have estimated a cost of \$50,000 per plant for the cheapest hardware fix." Florida Power & Light Co. has received an estimate of cost, for this addition, from its NSSS supplier (Combustion Engineering). The proposal reaffirms that the estimate made by the NRC is in fact correct.

In addition the following was also stated in the enclosure: "Based on the low estimated frequency and low estimated consequences of an inadvertent criticality, we conclude that boron dilution events do not constitute a significant risk to the public. The licensing process need not wait while this matter is resolved."

Florida Power & Light believes that the response to NRC question 440.28 is still applicable.

*RSB(LIA 06)
SER SECT 1516.3
ECD: NONE DETERMINED
BECAUSE FPL
DOES NOT AGREE
WITH NEED*

For these reasons FP&L has concluded that implementation of this design change is not required at this time and reactor operation without this design modification is justified.

PSB (LIANG)
SAR SECT: 514.3
ECD: 5/83

Boron Mixing Test

- A. This test will demonstrate the ability to adequately mix boron during natural circulation cooldown.
- B. The boron mixing tests are expected to be performed at San Onofre Units 2 and 3 in the first quarter of 1983. This schedule does not coincide with the present St. Lucie Unit 2 Core Load date.
- C. The report justifying adequate boron mixing during natural circulation cooldown will be provided to the staff prior to completion of High Power Testing.
- D. The above schedule is based on the San Onofre test results being available in advance of FP&L being able to perform the test themselves.

PSB (CHOPRA)
SAR SECT: 8.3.1.1
ECD: 1st REFUEL

Diesel Generator Sequencing Relays

- A. In order to minimize the setpoint drift, the existing pneumatic type diesel generator load sequencing relays will be replaced with a solid state type relay if they prove to be more reliable.
- B. The solid state sequencing relays will be tested over a period of time to determine their reliability. If proven to be more reliable, the existing relays will be replaced with these solid state type relays. Due to testing time required to verify reliability the above change cannot be implemented before Core Load.
- C. This change will be implemented prior to the completion of the first refueling outage if the solid state relays prove to be of higher reliability than the existing pneumatic relays.
- D. As an additional precautionary measure to minimize potential drift of the relay setting, the rate of surveillance on the existing diesel generator sequencing relays will be increased to monitor the setpoint drift. This increased rate of surveillance will be included in the plant technical specifications. This increased surveillance requirement will minimize setpoint drift and interim operation will not affect the health and safety of the public. Therefore, FP&L believes that reactor operation during this interim period is justified.



PSB (CNDPRA)

ECD: 1ST REFUEL

2D Battery

- A. This is a non-safety related station battery.
- B. Due to the critical demand on the electrical construction trades and the recent nature of the design change, this item will not be completed by Core Load.
- C. The 2D battery will be installed and operational prior to the completion of the first refueling outage.
- D. The 2D battery is not a safety related piece of equipment and provides power to non-safety equipment only. Hence installation and operation before the first refueling outage will not affect safe operation of the plant. Therefore, FP&L feels that interim plant operation without the 2D battery is justified.

ETSB (LEE)

ECD: 1ST REFUEL

Continuous Oxygen Analyzer

- A. This system provides continuous monitoring of oxygen concentration in the waste gas system and initiates automatic isolation of the gas decay surge header when excessive oxygen concentrations are detected.
- B. The addition of a second continuous O₂ analyzer and the automatic isolation of the gas surge header will not be completed prior to Core Load. This relatively recent engineering change has not allowed sufficient time to fully incorporate this item into a reasonable construction schedule. This fact combined with the heavy demand on both the mechanical and electrical trades precludes completion by Core Load.
- C. This second oxygen analyzer and automatic isolation feature will be installed by the first refueling outage.
- D. The Gaseous Waste Management System that will be utilized prior to Core load will consist of a modified gas analyzer which will be capable of analyzing both hydrogen and oxygen. This system will monitor the gaseous concentration through a programmed sequence from sample sources which will encompass all potential sources of hydrogen and oxygen. The sampling of each source will include purging sample analysis and an alarm in the control

room when a high oxygen level is reached in the Waste Management System. Since the existing system design already provides O₂ level indication and high O₂ level alarm in the control room, thereby permitting remote manual isolation of the gas surge header, FP&L believes that interim reactor operation is justified.

ETSB (LGE)

ECD: 1 ST REFUEL

Waste Management System

- A. Several minor modifications to the Waste Management System will incorporate local temperature indicators and pressure instrumentation on various Waste Management components.
- B. These modifications will be incorporated prior to the first refueling outage. These changes cannot be completed prior to Core load due to the installation of higher priority items.
- C. The Waste Management Instrumentation will be installed prior to the first refueling outage.
- D. These system design enhancements will be incorporated to provide operational flexibility. The modifications would incorporate local temperature and pressure instrumentation for the following components:
 - (1) Waste Ion Exchanger - Local Temperature Indication
 - (2) Pre-Conditioning Exchanger - Local Temperature Indication
 - (3) Boric Acid Conditioning Exchanger - Local Temperature Indication
 - (4) Hold-up Drain Pump - Local Pressure Indication
 - (5) Distillate Pump - Local Pressure Indication
 - (6) Boric Acid & Waste Conditioning Pump - Local Pressure Indication
 - (7) Waste Gas Compressor - Local Pressure Indication
 - (8) Boric Acid Holding Tank Pump - Local Pressure Indication
 - (9) Flash Tank Pump - Local Pressure Indication

These modifications are for local indications of process auxiliaries and are not required for safe shutdown or accident mitigation. FP&L believes that plant safety will not be affected.

In addition, these modifications will not affect the existing control room instrumentation. For the above reasons FP&L believes that reactor operation, prior to the completion of these modifications, is justified.

Primary Water Makeup to Volume Control Tank

- A. This modification to the Chemical and Volume control system is a minor piping change to preclude inadvertent opening of the relief valve in the primary water fill line to the volume control tank.
- B. This piping modification will not be installed before Core Load because this item is of low priority in nature.
- C. The proposed modification will be completed subsequent to Core Load.
- D. The proposed system modification will be performed to facilitate operational flexibility and will not affect any safety related operations. Therefore, reactor operation without this modification is justified.

Permanent Refueling Canal Sump Pump

- A. The permanent refueling canal pumping system is used to drain the lower levels of the refueling canal.
- B. This change cannot be completed prior to Core Load because of the installation of higher priority items.
- C. The permanent refueling canal pumping system will be installed prior to the first refueling outage.
- D. The modification does not affect any safety related system or system operations. This system does not serve any safety function. The permanent pumping system will reduce plant downtime and enhance refueling operations. A temporary sump pump will be used to drain the refueling canal in the interim. Therefore, reactor operation is justified without this system.

7SB (RIDGELY)
SCD: 1st REFUEL

EEO (CAIN)

Environmental Qualification Program

ECD: YET TO BE
DETERMINED

The Environmental Qualification program and related seismic qualification will be addressed under separate correspondence.

Staff Augmentation Times

EPL (FEROTTI)

ECD

The status and schedule remains the same as identified in FP&L letter L-82-303.