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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.  
 AUTH. NAME: UHRIG, R. EL. AUTHOR: AFFILIATION: Florida Power & Light Co.  
 RECIPIENT NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Confirms understanding of ESF actuation sys (ESFAS) testing per IEEE-338 & Reg Guide 1.22 requirements in response to 830318 ltr. All ESFAS actuation devices tested during shutdown per FSAR & Tech Specs.

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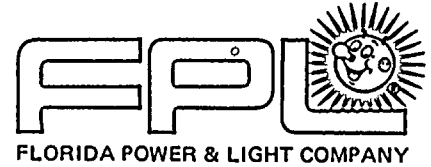
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March 30, 1983  
L-83-199

Office of Nuclear Reactor Regulations  
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 NO. 2  
DOCKET NO. 50-389  
ESFAS TESTING

In a letter dated March 18, 1983, from G.W. Knighton (DL/LB3) to Dr. R.E. Uhrig (FP&L), FP&L was requested to confirm the staff's understanding of the St. Lucie Unit No. 2 FSAR (Sections 7.2.1.1.9, 7.3.1.1(d) and 7.4.2.3) regarding ESFAS testing in accordance with the requirements of IEEE-338, "Standard Criteria for the Periodic Testing of Nuclear Power Generating Station Safety Systems" and Regulatory Guide 1.22, "Periodic Testing of Protection Systems Actuation Functions". IEEE-338 and R.G. 1.22 require the protection systems be designed to allow periodic testing at power.

FSAR Sections 7.2.1.1.9, 7.3.1.1(d) and 7.4.2.3 indicate that testing capabilities at power exist. Section 7.3.2.1.3 indicates that those actuated devices which are not tested during reactor operation are tested during scheduled reactor shutdown. All ESFAS actuation devices that are not tested during normal operation but are tested during shutdown are provided on Table 7.3-9 of the FSAR.

In conclusion, FP&L believes that the FSAR and Technical Specifications provide sufficient information regarding ESFAS testing requirements. To further clarify existing information regarding those ESFAS actuation devices not tested during normal operation, FP&L will revise Table 7.3-9 of the FSAR to indicate what effects the actuation of those devices listed on the table would have on plant operation. This table will be revised and submitted by May 15, 1983.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

*Robert E. Uhrig*  
Robert E. Uhrig  
Vice President

*Boo!*

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

