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FACIL:50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Provides assurances that single failure in circuits penetrating containment lacking primary & secondary fault protection would not impair integrity of containment electrical penetration per Reg Guide 1.63 commitment.

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FLORIDA POWER & LIGHT COMPANY

April 6, 1983
L-83-218

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
Regulatory Guide 1.63 Commitment

In recent telephone conversations with members of the Power Systems Branch, FPL was requested to provide additional assurance that a single failure in those circuits penetrating containment which do not have primary and secondary fault protection would not impair the integrity of a containment electrical penetration.

The Majority of the circuits in question have not been provided with the protection required by Regulatory Guide (R.G.) 1.63. For those affected circuits not meeting R.G. 1.63, FPL will implement design modifications to meet R.G. 1.63 by the start-up following the first refueling outage.

FPL is providing the following justification for this extension to first refueling: The low and medium voltage power systems (i.e., 480V, 4.15k and 6.9kV) are high impedance grounded. The predominant fault mode for such circuits is typically a single line to ground fault. For these circuits having a high impedance grounding system, ground fault currents would not result in unacceptable degradation of the penetration assembly because the ground fault currents are much below the continuous current carrying capability of the penetration conductors.

FPL will also perform a surveillance every four (4) months by testing at least one representative of each type of molded case circuit breaker used in those circuits yet to be modified. This will therefore provide adequate assurance that the existing circuits with one protective device will function as designed. Further, it is FPL's judgement that the occurrence of a LOCA, coupled with a three phase fault and an independent failure of a protective device occurring simutaneously during this limited period is highly unlikely.

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Should you have any questions regarding this matter, please contact us accordingly.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/RJS/PPC/cab

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