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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
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 RECIP. NAME RECIPIENT AFFILIATION
 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to Generic Ltr 82-33 re requirements for emergency response capability (NUREG-0737, Suppl 1); Status & proposed implementing schedule submitted.

DISTRIBUTION CODE: A003S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 15
 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737 (Generic Ltr 82-33)

NOTES: Add: W. Paulson

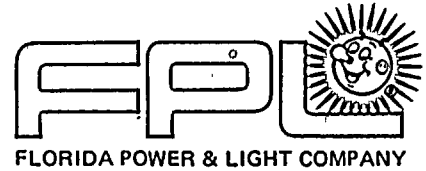
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April 15, 1983
L-83-236

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
Supplement 1 to NUREG 0737
(Generic Letter 82-33)

Your letter dated December 17, 1982 transmitted Supplement 1 to NUREG 0737 (Generic Letter No. 82-33). This Supplement distilled the basic requirements for five NUREG 0737 items regarding Requirements for Emergency Response Capability. It also requested that we develop our own plant specific schedule for integrating these items and implementing whatever modifications are deemed necessary. -

We have participated continually in the Nuclear Utility Task Action Committee (NUTAC) on Emergency Response Capabilities, which includes over 40 utilities and is administratively supported by INPO. We have factored into our schedule the guidance developed by the NUTAC on integrating these initiatives. Since we have already accomplished a significant amount of work on these, as well as other NUREG 0737 items, we were forced to deviate somewhat from the "idealized" integration scheme, but have generally followed its outline.

The following are our status and proposed implementing schedules for the items in Supplement 1 to NUREG 0737:

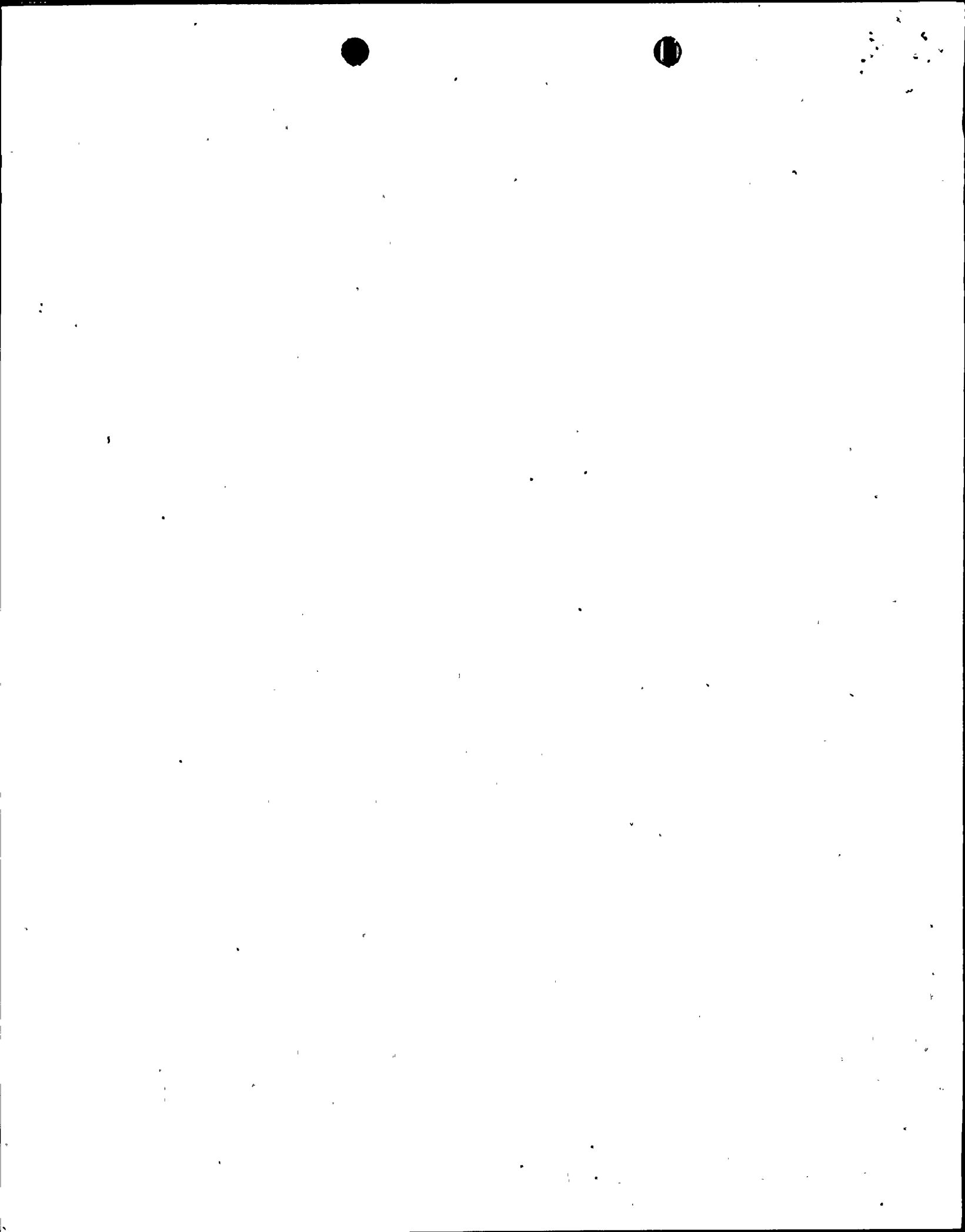
SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

1. Current Status

The parameter selection in accordance with NUREG-0696 and the functional design specification has been completed. The hardware has been factory tested and delivered to the site for installation. The computer system has been installed and powered from vital AC systems, and the software is being tested at the factory. The safety signal cables are being terminated in the isolation cabinets.

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W. Paulson

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2. Submittal of Parameter Selection Basis and SPDS Implementation Plan Report.

The reports describing the parameter selection and definition along with the implementation plan will be submitted by March 1, 1984.

3. Date When SPDS will be Operable and Operators Trained

The SPDS will be operational prior to startup from the Fall 1984 Refueling Outage. The verification and validation of the SPDS and operator training will be completed prior to the SPDS becoming operational.

DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

1. Current Status

We have already begun our DCRDR for St. Lucie Unit 1. We anticipate completion by May 30, 1983. Therefore, the requirement of Supplement 1 to submit a program plan within two months of the start of DCRDR has been superceded. With the issuance of the Supplement and the finalization of NRC requirements, we will now prepare the required documentation.

2. Submittals

The management plan describing our DCRDR program will be submitted by June 1, 1983. A summary report of the completed review, describing the Human Engineering discrepancies review and assessment, and proposed implementation schedule will be submitted by November 1, 1983. Actual modifications to the control room will be dependent upon NRC review and approval of the summary report.

REGULATORY GUIDE 1.97 REV. 2

1. Current status

We have reviewed our existing accident monitoring instrumentation and control systems against the requirements of Regulatory Guide 1.97, Rev. 2. We are presently assessing the deviations found and are developing the schedule for required modifications, if any.

2. Submittals

The evaluation report of the plant instrumentation, schedule for any required modifications, and justification of any deviations not requiring modifications will be submitted by January 1, 1984. Actual modifications will be dependent upon review and approval by the NRC.

UPGRADE EMERGENCY OPERATING PROCEDURES (EOPs)

1. Current Status

We have been active participants in the Combustion Engineering Owners Group (CEOG) efforts regarding the upgrading and reformatting of the EOPs. Our plant specific procedure generation will be based upon the generic Technical Guidelines submitted to the NRC by the CEOG.

2. Submittals

We will submit a plant specific procedures generation package by November 1, 1983. The upgraded EOPs will be implemented by July 1, 1984, and will include inclusion of the SPDS and control room upgrades.

EMERGENCY RESPONSE FACILITIES (ERF)

Supplement 1 requires that we provide the operational dates for the ERFs.

1. Technical Support Center (TSC) - The TSC is currently operational except for extensive construction activity. These activities are preparatory to installing the SPDS and will be completed prior to the end of the current refueling outage.
2. Operational Support Center (OSC) - The OSC is currently operational.
3. Emergency Operation Facility (EOF) - The EOF is currently under construction and will be completed and operational by October 1, 1983.

It should be noted, as stated in the SPDS discussion, the SPDS will not be operational prior to startup from the Fall 1984 Refueling Outage. The SPDS will be provided in the EOF and TSC at that time. However, we consider the SPDS an additional aid to emergency recovery and not a requirement for the ERFs to be operational.

We look forward to discussing these schedules with our Project Manager to arrive at a mutually acceptable schedule. FPL has devoted considerable time and effort in the past to implementing NUREG-0737 requirements. It is our opinion that with these previous modifications and upgraded plant operations, the continued

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut

Page 4

operation of the plant should pose no threat to the health and safety of the public with consideration of our implementation schedule for Supplement 1 to NUREG 0737.

Very truly yours,



Robert E. Uhrig
Vice President
Advanced System & Technology

REU/JEM/js

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

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