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 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

DOCKET # 05000389

SUBJECT: Forwards resolution of Item I.C re remote shutdown demonstration prior to initial criticality, per Region II request. Item closed. Requests Region II be notified of concurrence following review.

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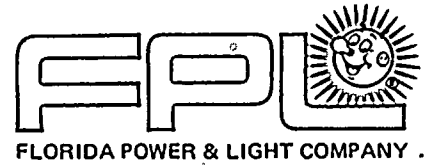
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May 25, 1983
L-83-324

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
REMOTE SHUTDOWN DEMONSTRATION

Attachment 1 to Facility Operating License NPF-16 identified several items that should be completed to the satisfaction of NRC Region II prior to initial criticality. Item I.C required the resolution of an NRC inspector follow-up item (item No. 82-63-04) regarding Remote Shutdown Demonstration. Following discussion with your Licensing Project Manager (Mr. Victor Nerses), FP&L understands that this item has been transferred to NRR for disposition.

Accordingly, please find attached FP&L's resolution of this item for your review. Based on the attached technical discussion, FP&L considers this item closed. Following your review, we request that you inform Region II of your concurrence. This will ensure a timely closure of this item by the regional inspector.

Very truly yours,

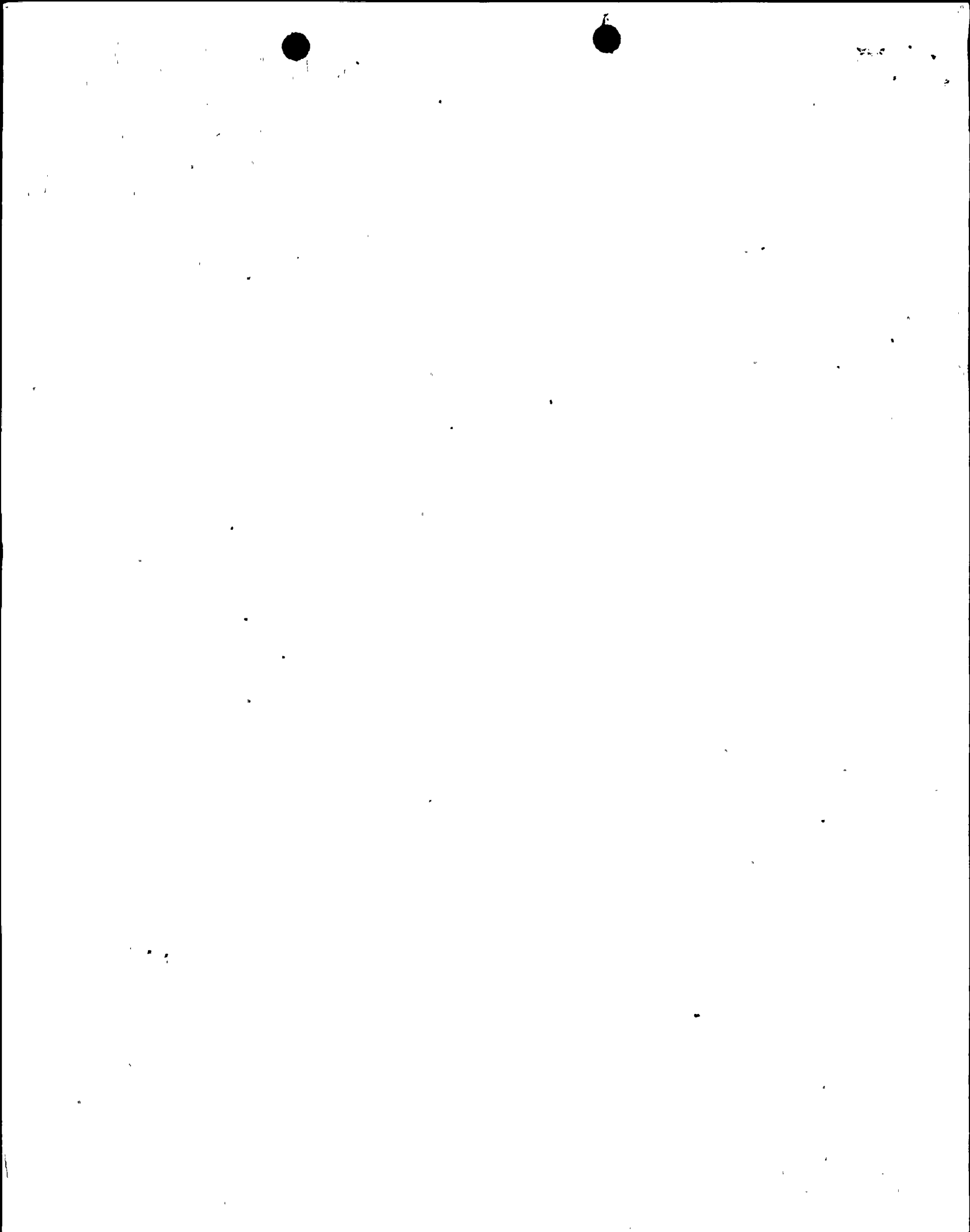
Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/PPC/mp
cc: J.P. O'Reilly, Region II
Harold F. Reis, Esquire

Boo!
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Attachment

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TECHNICAL DISCUSSION

REMOTE SHUTDOWN DEMONSTRATION TEST FOLLOW-UP

Introduction

Attachment 1 to the St. Lucie Unit No. 2 Facility Operating License is a list of items to be completed prior to initial criticality. Item I.C. requires the applicant to resolve remote shutdown demonstration test follow-up item 82-63-04. This item applies to plant construction, design and the preoperational procedure related to shutdown remote from the control room.

Summary

GDC 19 (Reference 2) states that equipment must be provided at appropriate locations outside the control room for two purposes. The first requires a design capability to promptly attain and safely maintain a hot standby condition. Secondly, the equipment must have potential capability for subsequent cold shutdown of the reactor using suitable procedures and additional personnel. Regulatory Guide 1.68.2 (Reference 3), in support of these objectives, describes a start-up test procedure for demonstration of these capabilities.

The FPL preoperational test procedure, as written and successfully demonstrated in November 1982, first brought the system to hot standby at the hot standby panel, then to cold shutdown, with additional actions not at the hot standby panel. Both capabilities were therefore demonstrated in sequence.

Plant start-up personnel recommended numerous design changes which would provide convenience to a minimum crew attempting to perform this evolution. Only one of these recommended changes (easy access to the sound-powered phone boxes) was required to be incorporated. The other design change recommendations are not required for hot standby panel operation, but to prevent over-boration and cooldown at a rate which could exceed Technical Specification limitations during the cold shutdown test. In the actual situation of coming to cold shutdown (not a test), these are not concerns. In this situation, additional personnel would always be available. This resolution is supported by the Safety Evaluation Report and its supplements.

Discussion

The Safety Evaluation Report concludes that the St. Lucie Unit No. 2 Hot Standby (Shutdown) Panel design is acceptable and in accord with the requirements of General Design Criterion 19. Paragraph 9.4.5 of the SER states that the Hot Shutdown Panel located outside the main control room contains controls and instrumentation to enable the operator to achieve and maintain the plant in hot standby condition in the event that the control room must be abandoned. The plant can be held at hot standby mode for a period of time sufficient to re-occupy the control room, or alternately, to enable the available operators to continue to cold shutdown utilizing the existing design configuration. This satisfies R.G. 1.68.2, Rev. 1 (Reference 3) which states that "cooldown demonstration may be accomplished using additional personnel who could be made available to the unit prior to the time that cooldown would have to be initiated."

Reference 3 also states that the cold shutdown demonstration need not be performed immediately following demonstration of achieving and maintaining hot standby from outside the control room. The preoperational test demonstrated during November 1982, sequentially satisfied both verification tests discussed in Reference 3.

Conclusion

After review of pertinent documentation, it has been concluded that resolution of the follow-up items (Inspector Report 82-63-04) requires incorporation of only one action item, which is improved access to the sound-powered phone boxes. This improved access has been provided. This item is closed.

References:

1. Issuance of Facility Operating License No. NPF-16, D. E. Eisenhut to R. E. Uhrig, dated April 6, 1983.
2. General Design Criterion (GDC) 19, "Control Room" of Appendix A to 10 CFR 50.
3. Regulatory Guide 1.68.2, Rev. 1, Initial Start-up Test Program to Demonstrate Remote Capability for Water-cooled Nuclear Power Plants.