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

DOCKET #  
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SUBJECT: Forwards list of addl ESF actuation sys relays not identified in 830926 submittal or FSAR to be testable w/o jeopardizing plant safety. Sufficient justification provided for not testing relays.

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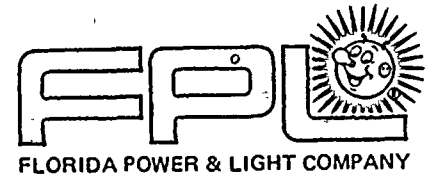
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October 21, 1983  
L-83-526

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  
ESFAS Actuation Relay Testing

- References:
- 1) FPL Letter L-83-497 dated September 26, 1983 from Dr. R. E. Uhrig (FPL) to D. G. Eisenhut (DL)
  - 2) NRC Letter dated June 7, 1983 from G. W. Knighton (DL/LB3) to Dr. R. E. Uhrig (FPL)

Per Reference 2, Florida Power & Light Co. (FPL) was requested to provide a list of specific ESFAS actuation devices (subgroup relays, initiation relays, etc.) that cannot be tested during plant power operation without jeopardizing plant safety or operability along with a justification why these devices cannot be tested. In addition, FPL was requested to provide information to verify that the actuated equipment assignments to each actuation device were made in a manner to minimize the number of components which cannot be tested at power.

Via Reference 1, FPL submitted a table listing specific devices and their associated actuated equipment which cannot be tested at power. This list represented equipment that had not been previously identified in Table 7.3-9 of the St. Lucie Unit 2 FSAR.

Subsequent to the submittal of Reference 1, plant personnel identified additional equipment whose actuation has the potential of causing a plant trip. It has been determined that actuating the 4.16 KV undervoltage interlock (located on test groups 7A and 7B) concurrent with an undervoltage condition on the 4.16 KV buses will cause a plant trip. Under voltage on the 4.16 KV buses will not trip the plant unless these interlocks are armed. This concern was identified to the NRC in a conference call held between FPL and NRC staff on September 30, 1983.

While the undervoltage interlocks had previously been identified as non-testable, the SIAS test groups 7A and 7B had not. To prevent arming these interlocks, SIAS test group 7A and 7B may not be tested. The attached table represents additional equipment that will be affected that had not been previously identified in either the FSAR or Reference 1. FPL therefore considers sufficient justification is provided for not testing these components.

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Page 2  
Office of Nuclear Reactor Regulations  
Mr. Darrell G. Eisenhut, Director

Should you have any questions concerning this letter, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "J. W. Williams, Jr.", with a large, stylized flourish at the end.

J. W. Williams, Jr.  
Vice President  
Nuclear Energy Department

JWW/JEM/cab

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



<u>ESFAS Test Group</u>	<u>Actuation Device</u>	<u>Components Not Tested</u>	<u>Reason Not Tested At Power</u>	<u>Justification for Not Testing</u>
SIAS 7A	K507A	Diesel Generator 2A	Actuating 4.16 KV UV Interlocks (also on SIAS 7A) may cause a plant trip.	Diesel Generator 2A is also started on CIAS 5A test group.
SIAS 7B	K607A	Diesel Generator 2B	Actuating 4.16 KV UV Interlocks (also on SIAS 7B) may cuase a plant trip.	Diesel Generator is also started on CIAS 5B test group.