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 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.
 AUTH. NAME: WILLIAMS, J.W. AUTHOR AFFILIATION: Florida Power & Light Co.
 RECIP. NAME: EISENHUT, D.G. RECIPIENT AFFILIATION: Division of Licensing

DOCKET #
 05000335
 05000389

SUBJECT: Provides justification for revising schedule change for implementation of upgraded emergency operating procedures, per Suppl 1 to NUREG-0737.

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 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737 (Generic Ltr 82-33)

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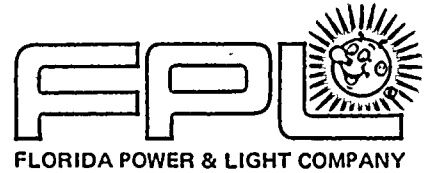
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Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: St. Lucie Unit 1 & 2
Docket No. 50-335 and 389
Supplement 1 to NUREG 0737 -
Upgrade of Emergency Operating Procedures

Our letter L-83-236, dated April 15, 1983, presented a schedule for implementing upgraded Emergency Operating Procedures (EOP's) by July 1, 1984, with a plant specific procedures generation package submitted by November 1, 1983. The purpose of this letter is to present justification for revising the schedule change for implementation of the upgraded EOP's.

The Combustion Engineering Owner's Group (CEOG) Technical Guideline document was resubmitted to the NRC on November 1, 1982 as CEN-152 Rev. 1. Your Safety Evaluation of CEN-152 Rev. 1 was transmitted to the CEOG by D.G. Eisenhut's letter dated July 29, 1983. Section 4.3, Longer Term Needs, identified 12 major areas of concern consisting of 32 specific items which have been addressed by the CEOG Operations Subcommittee. In addition to these long term items, the CEOG is addressing the "Automatic Trip of Reactor Coolant Pumps" in accordance with D.G. Eisenhuts Generic Letter No. 83-10a, dated February 8, 1983.

As a result of these NRC required revisions to CEN-152, the CEOG is submitting Revision 2 to CEN-152 on April 1, 1984. This revision will address the RCP trip issue, the reactor vessel level monitoring system issue and four long term issues. The CEOG Operations Subcommittee has scheduled a meeting with the NRC Procedures and Test Review Group on February 23, 1984 to review the remaining 28 long term issues. The meeting should provide the necessary information to schedule technical work needed to address the remaining long term issues.

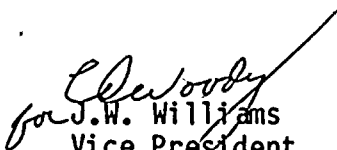
Therefore, based upon the additional work yet to be performed by the CEOG, and approvals needed from the NRC, we will delay the upgrade of the EOP's until July 1, 1985. The latest guidelines will be used to revise the St. Lucie Units 1 and 2 EOP's in accordance with the St. Lucie Plant Procedures Generation Package submitted in accordance to our proposed schedule.

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While we are delaying the final upgrading of the EOP's, it should be noted that the St. Lucie Plant's EOP's have already undergone an initial upgrade. The St. Lucie Plant Unit 2 EOP's were revised and approved during the early part of 1983 prior to the issuance the of Unit 2 Operating License. The latest technical information from CEN-152 Rev. 1 was used, and the technical content was verified by the Combustion Engineering personnel who helped prepare CEN-152 Rev. 1. Later in 1983, Unit 1 EOP's were revised using Unit 2 procedures as a guide. Even though the currently implemented procedures meet the "short term review requirements" they will be revised to comply with changes made to CEN 152 technical guidelines.

Very truly yours,


J.W. Williams
Vice President
Nuclear Energy

JWW/JEM/djc

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