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

SUBJECT: Application for amend to License NPF-16,modifying Tech Specs to depay initial inservice insp for two mechanical snubbers on containment spray sys until first refueing outage.

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FLORIDA POWER & LIGHT COMPANY

February 24, 1984
L-84-45

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
Proposed License Amendment
Snubber Visual Inspection

In accordance with 10 CFR 50.90, Florida Power & Light Company submits herewith three signed originals and forty copies of a request to amend Appendix A of Facility Operating License NPF-16.

This amendment is submitted to modify the existing technical specification requirement for the initial inservice inspection for two mechanical snubbers.

At present, the technical specifications require a visual inspection of all safety-related snubbers between 4 and 10 months after commencing power operation. The purpose of the visual inspection is to identify obvious damage to snubbers.

FPL requests that this visual inspection be delayed until the first refueling for two safety-related snubbers on the containment spray system. Justification for this relief is as follows:

(1) The required inspection has been done on 321 mechanical (and 20 hydraulic) snubbers with no inoperable snubbers and no significant problems found. This is the total required snubber inspection except for the two inaccessible snubbers under discussion.

(2) Snubbers are required to perform their safety function during a seismic event. The St. Lucie site is located in a region of infrequent and minor seismic activity. The following is taken from Section 2.4.2.1 of the FSAR concerning "Seismicity":

"The Uniform Building Code designates the site vicinity as Zone 0 on the map entitled, "Map of the United States Showing Zones of Approximate Equal Seismic Probability." The US Coast and Geodetic Survey indicates Zone 0 as an area of no earthquake damage. Hadley and Devin also place this portion of Florida in a zone where the seismic frequency approaches zero. Furthermore, an examination of the epicentral map (Figures 2.5-31 and 2.5-32 of the FSAR shows a broad segment of south central Florida in which possible epicenters are entirely absent. The St. Lucie site is in the middle of this region."

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(3) The startup test program as well as additional programs carried out to establish compliance with I & E Bulletin 79-14 have insured proper design, installation, and operation of all snubbers.

The following steps have been taken to insure that snubbers will perform their safety function:

a) They were tested at the factory.

b) Upon receipt at the site, they were exercised to verify there are no frozen parts.

c) The snubbers were exercised just prior to installation.

d) Correct installation was verified by Site Quality Control inspectors

e) During Hot Functional Testing, a thermal expansion monitoring program verified that all snubbers moved properly and had the correct cold and hot load settings.

f) FPL's vibration monitoring program identified all areas of high vibration and none of the areas identified involved snubbers.

g) FPL's IEB 79-14 program assured that all hangers are correctly designed for the as-built system.

(3) Unit shutdown solely to perform this inspection would place an unwarranted financial burden on FPL's customers.

The proposed amendment is described below and shown on the accompanying technical specification Page 3/4 7-21.

Technical Specification 4.7.9(b) is changed to postpone visual inspection of the two containment spray snubbers listed in Table 3.7-3b that are inaccessible during normal plant operation until the first refueling.

A safety evaluation and significant hazards evaluation is required by 10 CFR 50.91 and 92 is in Attachment A. The proposed amendment has been reviewed by the St. Lucie Plant Facility Review Group and the Florida Power & Light Company Nuclear Review Board.

In accordance with 10 CFR 170.22, it has been determined this represents a Class III amendment and a check for payment will follow under separate cover.

Very truly yours,

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

JWW/PLP/djc

STATE OF FLORIDA)
) ss.
COUNTY OF DADE)

J. W. Williams, Jr., being first duly sworn, deposes and says:

That he is a Vice President of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

J. W. Williams, Jr.

Subscribed and sworn to before me this 24th day of February, 1984.

NOTARY PUBLIC, in and for the County of Dade, State of Florida.

My commission expires: Dec 9, 1984