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

SUBJECT: Requests NRC delete requirement for prior approval on insulating matls for new power cable installation. Request would allow util to purchase cable in same manner other Class IE equipment procured.

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FLORIDA POWER & LIGHT COMPANY

July 24, 1984
L-84-183

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 NO. 1
DOCKET NO. 50-335
UNDERGROUND CABLE

Section 8.3.1.1.9 of the St. Lucie 1 Final Safety Analysis Report (FSAR) requires that for future modifications any change to the insulating material used on power cables at St. Lucie 1 receive prior NRC approval. This requirement stems from the licensing phase at St. Lucie 1 when cabling used in a wet-dry environment was under scrutiny by the NRC. In addition to this commitment, St. Lucie 1 was given Technical Specifications requiring the periodic testing of cable in the wet-dry environment.

The cable is in the underground Class IE ductbank system, which is installed above the normal water table. The normal cable service is dry, however, water may enter the system, for example, during periods of heavy rainfall. High temperature and radiation are not associated with the underground system. Accordingly, the only environmental service factor that is a design consideration is the periodic exposure to water.

On June 28, 1982, FPL submitted a license amendment to delete the testing requirement on buried cable via letter L-82-249. In the Safety Evaluation for that amendment, FPL showed that substantial industry experience had identified no failures of cable used in wet-dry environments. This same information had been provided earlier to the Advisory Committee on Reactor Safeguards (ACRS) Subcommittee on AC/DC Power Systems Reliability. Based on the results of the information provided to the ACRS, the St. Lucie 1 request to delete the Technical Specification for periodic testing of cable in the wet-dry environment was accepted by NRC.

The purpose of this letter is to request that the NRC delete the requirement for prior staff approval on insulating materials for new power cable installation. This would allow FPL to purchase cable in the same manner it procures other Class IE equipment.

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All Class IE cable installed for plant operation will be qualified for the environmental condition it will experience during normal and/or accident service as applicable. All cable will be suitable for service in wet or dry locations and will be tested in accordance with appropriate standards such as Insulated Power Cable Engineers Association (IPCEA), National Electrical Manufacturers Association (NEMA), Association of Edison Illuminating Companies (AEIC) Standards, and purchase order specifications (as applicable) to insure their suitability for normal, dry, alternately wet and dry, and submerged conditions of service in tray, conduit and underground installations.

Each new cable insulating material to be used at St. Lucie will be evaluated to ensure that its documented dry/wet/alternately wet and dry properties are equal to or better than that of materials with many years or proven service. This evaluation will be documented via a Plant Change and Modification (PC/M) prior to installation. Vendor documentation for cable material, cable environmental qualification, and test data to appropriate industry standards will be evaluated for acceptability.

FPL is presently receiving bids from manufacturers for cable that will be used to implement NRC required plant modifications (e.g. Appendix R). The insulation systems approved for St. Lucie 1 are 10 years old, and are no longer available commercially. They have been replaced by new insulating systems. Accordingly, it is requested that NRC approve this request by September, 1984 so that we may purchase the required cable in a manner that will allow completion of Appendix R requirements on schedule.

Should you have any questions or comments regarding this submittal, please contact us.

Very truly yours,

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

JWW/RJS/DCB/mp

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