

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8410290046 DOC. DATE: 84/10/23 NOTARIZED: YES DOCKET #  
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335  
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389  
 AUTH. NAME AUTHOR AFFILIATION  
 WILLIAMS, J.W. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 EISENHUT, D.G. Division of Licensing

SUBJECT: Responds to Item 2 of Generic Ltr 84-15 re improvement & maint of diesel generator reliability. Formal log to readily meet intent of Reg Guide 1.108 implemented.

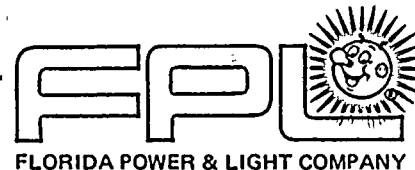
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 TITLE: OR Submittal: Fast Cold Starts of Diesel Generators GL-83-41

NOTES: 05000335  
 OL: 02/01/76  
 OL: 04/06/83 05000389

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October 23, 1984  
L-84-274

Office of Nuclear 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 Units 1 and 2  
Docket Nos. 50-335, 50-389  
Generic Letter 84-15

By letter dated July 2, 1984, the NRC requested that Florida Power and Light Company provide responses to three items concerning improving and maintaining diesel generator reliability. As discussed in my letter of August 31, 1984, the information herein is provided to respond to item 2 of Generic Letter 84-15.

In accumulating the below information, we researched the operators log, the out of service log, maintenance records, and interviewed both operations and maintenance personnel. It became apparent that this review of collective logs was very time consuming and does not provide a timely vehicle to collect data regarding reliability of our emergency diesel generators. We have implemented a formal log to meet the intent of Regulatory Guide 1.108, paragraph 3.a to more readily discern the reliability of each emergency diesel generator at St. Lucie Plant.

We are providing only the data for the last 20 valid demands per diesel per RG 1.108 for the following reasons:

As noted above, our former record keeping methods did not easily allow conclusive findings.

Unit 1 returned to operation in May 1984 after a 14 month outage. During this outage significant modifications were made to the diesel generators and extensive testing was required.

Unit 2 received its operating license April 6, 1983 and did not finish all diesel generator modifications and testing until early May 1983. Neither units' diesel generators have 100 "valid demands" per RG 1.108 during this interval May 1983 - September 1984.

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For both units, the existing technical specifications and RG 1.108 differ widely regarding testing. Many diesel generator starts without loading are required by technical specifications. Although RG 1.108 says tests intentionally terminated without loading are not valid tests, we do not believe that considering any actual failures to start not to be "failures" would be technically reasonable or acceptable to the NRC. The proposed technical specifications will eliminate many of these unloaded starts but there are other required tests which do not count as valid demands where failures would count. We will attempt to address this area in preparing the technical specification changes also requested by Generic Letter 84-15.

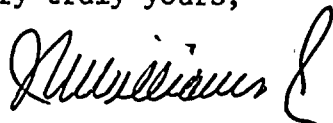
The data is tabulated below:

Reliability Data

Unit 1	-	"1A" Diesel Generator
		0 failures - last 20 demands
Unit 1	-	"1B" Diesel Generator
		0 failures - last 20 demands
Unit 2	-	"2A" Diesel Generator
		1 failure - last 20 demands
		Failure occurred 8/22/84 and was
		repaired, tested, and returned to
		service on 8/22/84
Unit 2	-	"2B" Diesel Generator
		0 failures - last 20 demands

The St. Lucie Plant has not previously kept a "yearly data report" on each diesel generator's reliability. It should be noted that using the RG 1.108 counting methods the last 100 demands would encompass a calendar year and the proposed technical specifications will require such a report. We also would like to point out that we feel we have aggressively pursued diesel generator reliability and details will be provided in part 3 of our response to Generic Letter 84-15.

Very truly yours,



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

JWW/RRJ:esr

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

STATE OF FLORIDA       )  
                                  )  
COUNTY OF DADE       ) ss.

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


That he is a Group 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

23 day of OCTOBER, 1984.

  
NOTARY PUBLIC, in and for the County  
of Dade, State of Florida  
NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. FEB 14, 1988  
BONDED THRU GENERAL INS. 040.  
My Commission expires: 2/14/88

