

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 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
 MILLER, J.R. Operating Reactors Branch 3

SUBJECT: Forwards info in response to NRC 840914 ltr re inadequate core cooling instrumentation sys, NUREG-0737, Item II.F.2. Implementation ltr rept & milestones for implementation of sys included.

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 TITLE: OR Submittal: Inadequate Core Cooling (Item II.F.2) GL 82-28

NOTES: 05000335
 OL: 02/01/76
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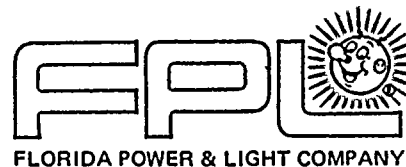
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The middle section of the page contains several lines of text that are also illegible due to extreme fading. Some faint shapes and lines are visible, but no readable characters are present.

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L-84-305
November 1, 1984


Office of Nuclear Reactor Regulation
Attention: Mr. James R. Miller, Chief
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Miller:

Re: St. Lucie Unit Nos. 1 & 2
Docket Nos. 50-335 & 50-389
Inadequate Core Cooling Instrumentation
(ICCI) System, NUREG 0737, Item II.F.2

The enclosed information is in response to your letter of September 14, 1984.
Enclosure (1) provides the response to your request for additional information;
Enclosure (2) provides the milestones for implementation of the ICCI System; and
Enclosure (3) provides the Implementation Letter Report.

Very truly yours,


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

JWW/RJS/cab

Enclosures

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ENCLOSURE (I)

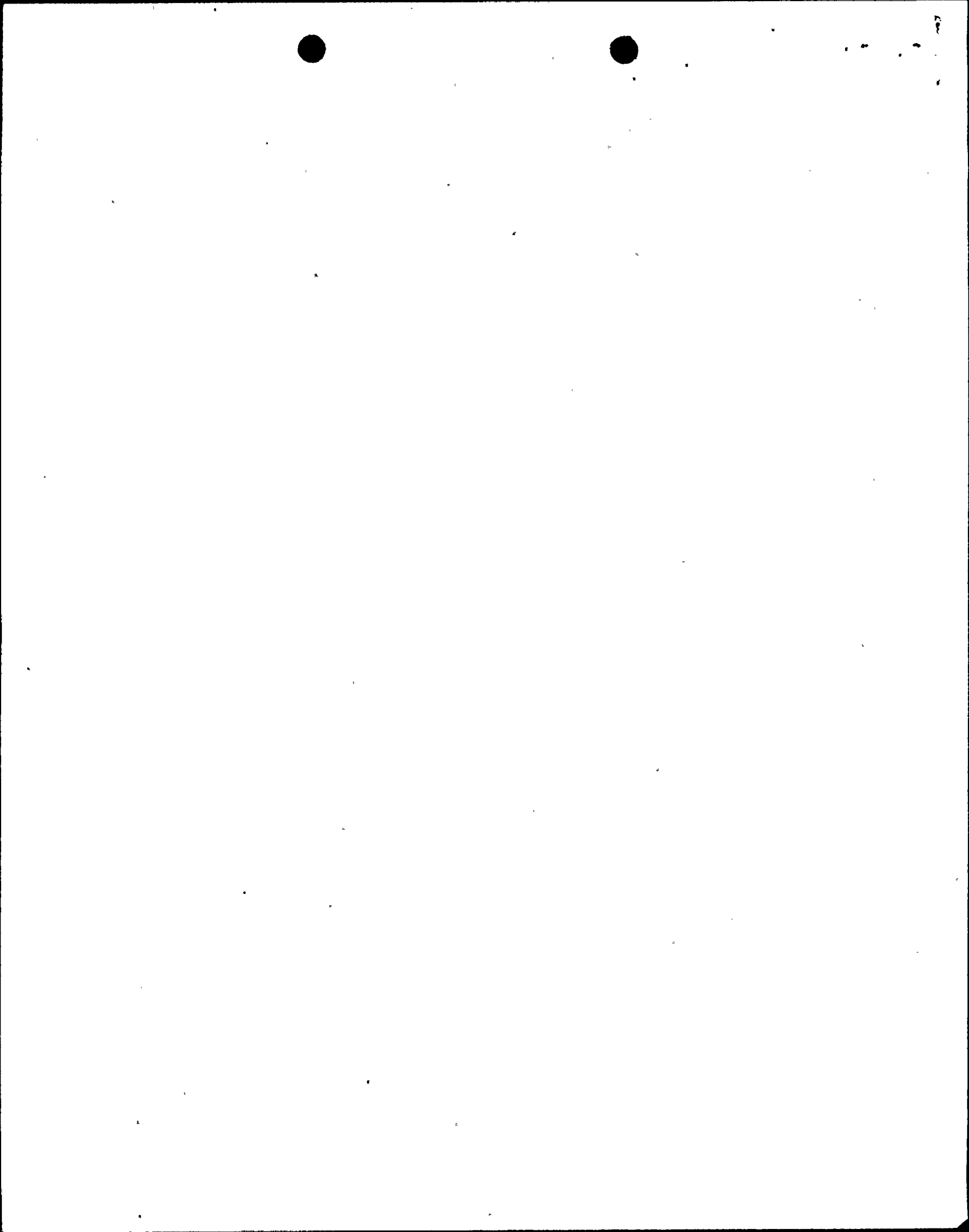
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
ON THE ICCI SYSTEM FOR ST. LUCIE UNIT NO. 1

NRC Item No. 1: Show schematically the final ICC instrumentation system and identify any deviations from the Appendix B to NUREG-0737 design requirements.

FPL Response: The final ICCS schematic is shown on Fig. 1 (Attachment 1). The ICCS system does not deviate from NUREG-0737 Appendix B design requirements.

NRC Item No. 2: Describe the operational status of the final ICCI system, and identify any as-built deviations of the system from your previous design descriptions.

FPL Response: The ICCS has been completely installed except for the interconnecting cable from QSPDS to SAS. The ICCS has been in operation since completion of the functional testing and calibration which were completed in April 1984. All equipment qualification tests have been completed and documented except for the qualification test report for the MI cable-connectors. The MI cable test report should be completed by the end of November 1984. There are no as-built deviations from the previous design descriptions.



ENCLOSURE (2)

ST. LUCIE UNITS 1 & 2
MILESTONES FOR IMPLEMENTATION OF
INADEQUATE CORE COOLING INSTRUMENTATION

NRC Item No. 1: Submit final design description (by licensee) (complete the documentation requirements of NUREG-0737, Item II.F.2, including all plant-specific information items identified in applicable NRC evaluation reports for generic approved systems).

FPL Response: FPL provided the design description for St. Lucie Unit 1 by letter L-83-133, dated March 10, 1983.

The design description for St. Lucie Unit 2 is provided in Sections 3.9.5.1.5 and 7.5.4 of the Unit 2 FSAR.

NRC Item No. 2: Approval of emergency operating procedure (EOP) technical guidelines - (by NRC).

Note: This EOP technical guideline which incorporates the selected system must be based on the intended uses of that system as described in approved generic EOP technical guidelines relevant to the selected system.

FPL Response: By letter dated September 14, 1984, NRC provided their staff comments on CEN-152, Revision 2, with respect to those portions of the EOP Guidelines which rely on RVLMS. FPL has agreed to use CEN-152, Revision 2 in conjunction with NRC staff comments for integration of the applicable EOPs for St. Lucie Units 1 and 2.

NRC Item No. 3: Inventory Tracking Systems (ITS) installation complete (by licensee).

FPL Response: The St. Lucie Unit 1 RVLMS installation was completed in March 1984. The St. Lucie Unit 2 system installation was completed in June 1983.

NRC Item No. 4: ITS functional testing and calibration complete (by licensee).

FPL Response: Functional testing and calibration was completed for St. Lucie Unit 1 in April 1984 and for St. Lucie Unit 2 in June 1983. The

preoperational testing addressed the following areas:

- (1) QSPDS Display Page System Test
- (2) Verification of Operator and System Alarms
- (3) Verification of System Calibration
- (4) Verification of Subcooled Margin Monitor
- (5) Verification of CET Algorithms
- (6) Verification of HJTC Algorithms

Instrument Accuracy was verified to be $\pm 4^{\circ}\text{F}$ for CET and HJTC inputs, and ± 15 psi for pressure inputs.

By letter L-84-27, dated February 3, 1984, FPL provided the results of the St. Lucie Unit 2 system checkout and test report in accordance with the Unit 2 License Condition 2.C.17.f.4.

Results of the Unit 1 system checkout are available at the site.

NRC Item No. 5: Prepare revisions to plant operating procedures and emergency procedures based on approved EOP guidelines (by licensee).

FPL Response: The appropriate St. Lucie Units 1 and 2 Emergency Operating Procedures have been revised as applicable using CEN-152, Revision 2 in conjunction with NRC staff comments with respect to those portions of the EOP Guidelines which rely on RVLMS (See Response to Item No. 2). The Unit 2 procedures will be implemented by November 15, 1984 and the Unit 1 procedures will be implemented by November 30, 1984.

NRC Item No. 6: Implementation letter report to NRC (by licensee).

FPL Response: Included as part of this submittal.

NRC Item No. 7: Perform procedure walk-through to complete task analysis portion of ICC system design (by licensee).

FPL Response: The procedure walk-throughs to complete the task analysis portion of ICCI system design will be coordinated with the Task Analysis Upgrade Program (DCRDR) and the development and implementation of the procedures based on the NRC approved Emergency Response Guidelines.

NRC Item No. 8: Turn on system for operator training and familiarization.

FPL Response: The systems have been operating since completion of the functional testing and calibration (See Response to Item No. 4). Operators have received training on the systems.

NRC Item No. 9: Approval of plant-specific installation (by NRC).

FPL Response: FPL is awaiting NRC approval of the plant-specific installations.

NRC Item No. 10: Implement modified operating procedures and emergency procedures (by licensee).

FPL Response: The modified procedures will be implemented on St. Lucie Unit 2 by November 15, 1984, and will be implemented on St. Lucie Unit 1 by November 30, 1984 (See Response to Items No. 2 and No. 4).

ENCLOSURE (3)

ST. LUCIE UNITS 1 & 2
IMPLEMENTATION LETTER REPORT

NRC Item No. 1: Notification that the system installation, functional testing, and calibration is complete and test results are available for inspection.

FPL Response: Installation, functional testing, and calibration of the ICCI systems for St. Lucie Units 1 and 2 have been completed and the test results are available for inspection.

NRC Item No. 2: Summary of licensee conclusions based on test results, e.g.:

- (a) the system performs in accordance with design expectations and within design error tolerances; or
- (b) description of deviations from design performance specifications and basis for concluding that the deviations are acceptable.

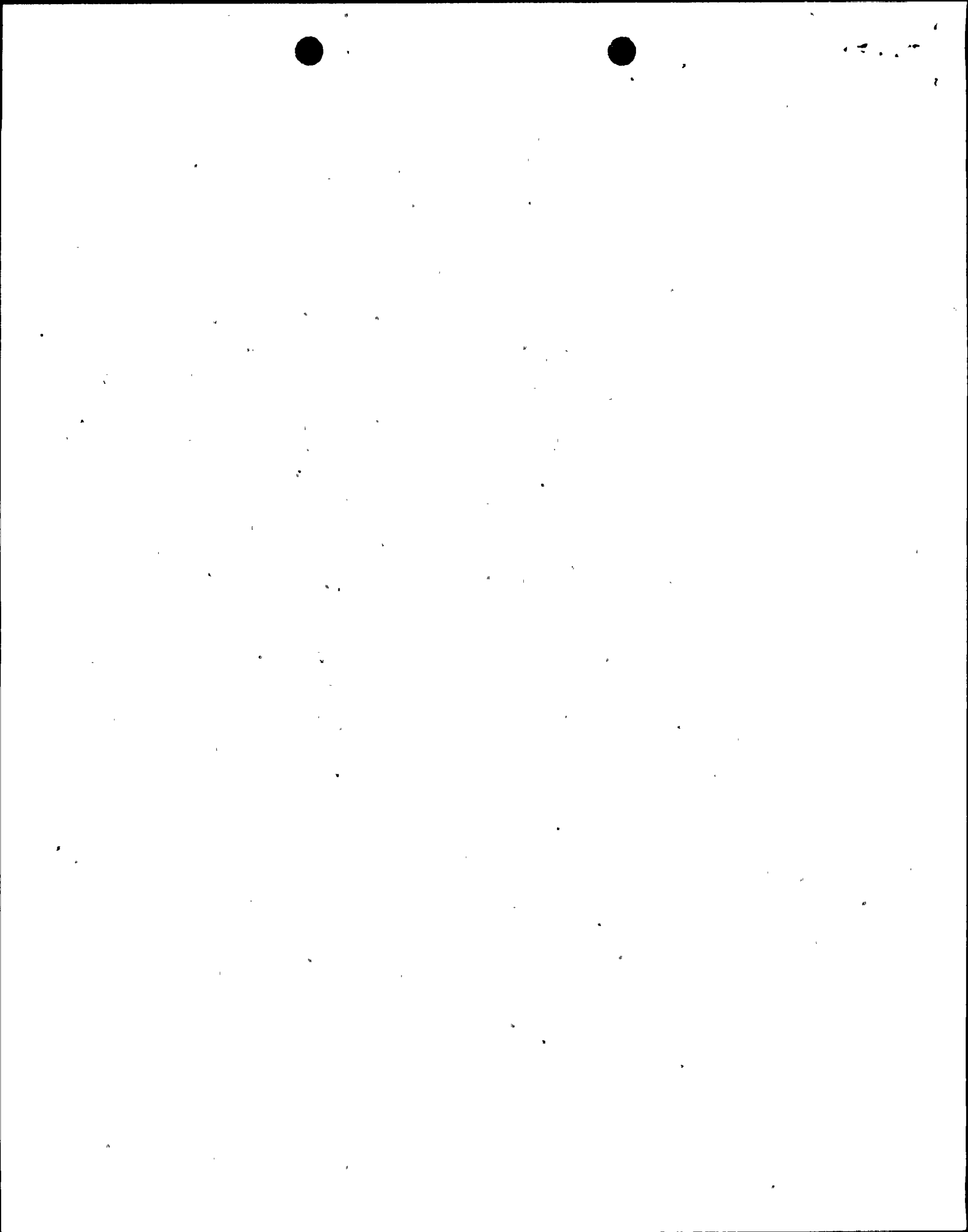
FPL Response: Based on test results, the system performs in accordance with design expectations and within design error tolerances. There were no deviations from design performance specifications. As indicated in the Response to Item No. 4 of Enclosure (2) of this letter, several problems have been experienced. FPL is pursuing resolution of these problems with Combustion Engineering, the system vendor.

NRC Item No. 3: Description of any deviations of the as-built system from previous design descriptions with any appropriate explanation.

FPL Response: There are no deviations of the as-built system from the previous design descriptions.

NCR Item No. 4: Request for modification of Technical Specifications to include all ICC instrumentation for accident monitoring.

FPL Response: FPL, as a member of the CE Owners Group, is participating in the effort to define appropriate operability requirements for the RVLMS. Until the operability requirements for the RVLMS are defined, it would be inappropriate to request modification of the Technical Specifications. Therefore, proposed Technical Specifications will be submitted upon completion of the CE Owners Group effort.



NRC Item No. 5: Request for NRC approval of the plant-specific installation.

FPL Response: FPL hereby requests NRC approval of the St. Lucie Units 1 and 2 plant-specific installations of the RVLMS.

NRC Item No. 6: Confirm that the EOPs used for operator training will conform to the technical content of NRC approved EOP guidelines (generic or plant-specific).

FPL Response: The appropriate St. Lucie Units 1 and 2 EOPs have been modified as described in the Response to Item No. 5 of Enclosure (2) of this letter.

