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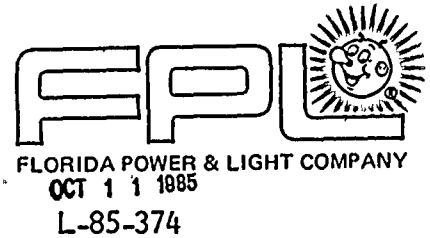
ACCESSION NBR: 8510180087 DOC. DATE: 85/10/11 NOTARIZED: NO DOCKET #
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 WILLIAMS, J.W. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 BUTCHER, E.J. Operating Reactors Branch 3

SUBJECT: Forwards response to 850429 request for addl info on
 Generic Ltr 83-28, Item 1.1 re post-trip review, Revised
 procedures re post-trip review & responsibilities of shift
 technical advisor encl.

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Office of Nuclear Reactor Regulation
Attention: Mr. Edward J. Butcher, Acting Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulation Commission
Washington, D.C. 20555

Dear Mr. Butcher:

Re: St. Lucie Units 1 & 2
Docket Nos. 50-335 & 50-389
Generic Letter 83-28
Item 1.1 - Post Trip Review


Attached is FPL's response to NRC's April 29, 1985 letter, Request for Additional Information (RAI) regarding St. Lucie Plants Post Trip Review procedures. The Post Trip Review procedure was revised in June 1985 and addresses your concerns. In addition, the "Duties and Responsibilities of Shift Technical Advisor" (STA) procedure was revised in July, 1985 and includes an STA abnormal occurrence report which provides additional information and record keeping for Post Trip Review as well as other events.

Attachment 1 - Point by point response to RAI

Attachment 2 - OP 0030119 Rev. 2 "Post Trip Review"

Attachment 3 - AP 0005725 Rev. 6 "Duties & Responsibilities of Shift Technical Advisor"

Very truly yours,

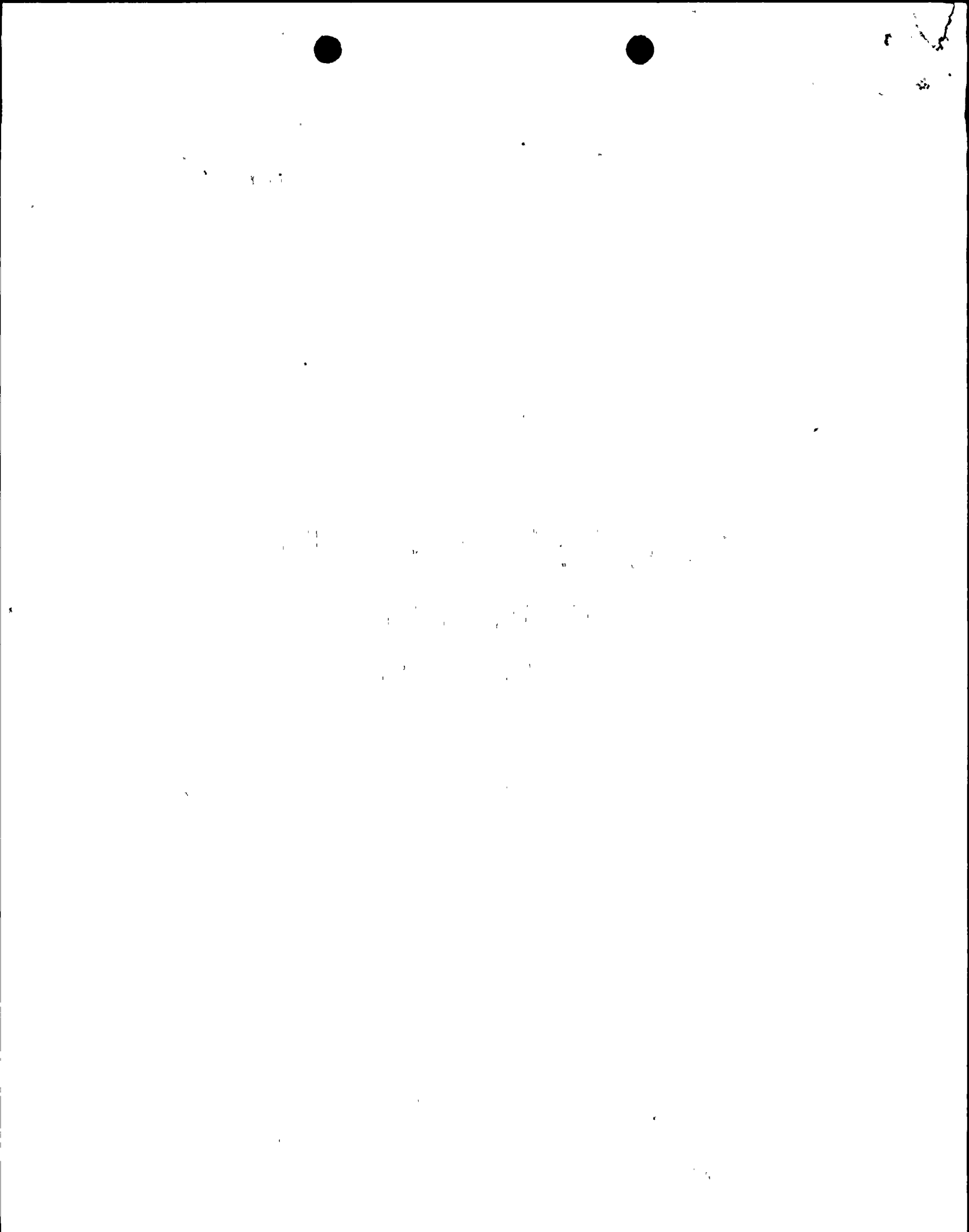

J. W. Williams, Jr.
Group Vice President
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JWW/cab

Ass

GRMI/002/1

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ATTACHMENT I TO L-85-374

Response to NRC Request for Additional
Information on item I.1, Generic Letter 83-28

(Refer to Specific Sections of OP 0030119 Rev. 2
to Evaluate Response)

NRC SE Concern

- III. A. Licensee indicated that a Post-trip review is conducted to identify the cause of the trip prior to the plant restart. We find that this action taken by Licensee is not sufficient to ensure safe plant operation. We recommend that Licensee establish criteria in accordance with the guidelines as described in the above Section II.A.
1. Post trip review team to determine root cause and sequence of events.

FPL Response

Part 8 of the revised procedure documents the cause of the trip.

Part 4 of the revised procedure documents the sequence of events.

NRC SE Concern

2. Near term corrective actions to remedy the cause of the trip.

FPL Response

Part 10 documents corrective actions for the cause of trip and any identified inadequate system performance listed in Part 9.

NRC SE Concern

3. Post trip review team has performed an analysis and determined that major safety systems responded to the event within specified limits.

FPL Response

Plant and major safety system response is documented in Part 2 of procedure and evaluated in Parts 5, 6, & 7.

NRC SE Concern

4. Post trip review has not resulted in the discovery of a potential safety concern.

FPL Response

Part 12 of procedure documents that the cause of trip has been identified and no unsafe conditions exist.

NRC SE Concern

5. If any of the above items 1 through 4 are not met, the Facility Review Group (FRG) should review the conditions prior to restart.

FPL Response

Part 12 requires FRG to review any trip for which cause is not determined prior to restart. The Plant Technical Specifications would prevent a restart should a safety concern, malfunction or inoperable major safety systems be discovered during the post trip review.

NRC SE Concern

- III. C. Review recommended that pertinent data obtained during post-trip review be compared to applicable data provided in the FSAR to verify proper operation of the systems and equipment. Where possible, comparisons with previous similar events should be made.

FPL Response

Part 7 of the revised procedure compares the trip with previous trips, the FSAR, CEN-128; and documents any significant differences and resolution.

NRC SE Concern

- III. D. If any guidelines identified in SER II A are not met, FRG should conduct an independent assessment of the event.

FPL Response

As provided in the response to III A item 5, this concern is addressed in Part 12 of the procedure and by Plant Technical Specifications.

NRC SE Concern

- III. E. Licensee did not provide specific plant safety assessment procedures which describe responsibilities and authorities of personnel involved with post-trip review activities, nor those procedures which contain methods and criteria for comparing actual plant response with expected plant response. We recommend that licensee's safety assessment program for unscheduled reactor trip should include all the information as described in the above Section II E.

FPL Response

II E reiterates the requirements of IIA which are discussed in the response to III.A. and the Post trip review procedure.