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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.
 AUTH. NAME AUTHORITY AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 THADANI, A. C. PWR Project Directorate 8

DOCKET #
05000389

SUBJECT: Requests interim relief from requirements of ASME Code,
 Section XI requiring installation of pump flow
 instrumentation on certain pumps, until Cycle 4 outage
 scheduled for late 1987 or early 1988.

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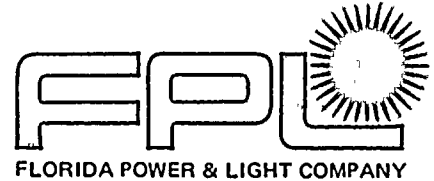
CONFIDENTIAL - SECURITY INFORMATION

DATE: 10/10/50

TO: SAC, NEW YORK

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March 11, 1986
L-86-101

Office of Nuclear Reactor Regulation
Attention: Mr. Ashak C. Thadani, Director
PWR Project Directorate #8
Division of PWR Licensing - B
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thadani:

RE: St. Lucie Unit No. 2
Docket No. 50-389
Relief From Parts of ASME Section XI

By letter dated October 6, 1983 Florida Power and Light Company submitted the Inservice Inspection and Testing Programs for St. Lucie Unit 2. That letter stated that the Inservice Testing Program would be conducted in accordance with Section XI of the 1980 Edition of the ASME Boiler and Pressure Vessel Code through the Winter 1980 Addenda, except for specific relief requested in accordance with 10 CFR 50.55a(g)(5)(iii). With respect to the pump test program, we requested relief from the IWP-4600 flow measurement requirement for certain pumps on the basis that fixed hydraulic resistance measurements (differential pressure) are sufficient to verify operational readiness.

By letter dated January 13, 1986, the NRC Office of Nuclear Reactor Regulation issued a Safety Evaluation related to the relief requests contained in our 1983 submittal. The evaluation states the current NRC staff position that licensees should measure both pump flow and pump differential pressure in accordance with requirements of the current edition of ASME Section XI. Therefore, our relief request associated with pump flow measurements was granted on an interim basis only, and we were directed to modify the plant to permit flow measurements prior to startup at the end of the next refueling outage.

The purpose of this letter is to advise you of the Impact of NRC's denial of the pump flow measurement relief requests and the subsequent requirement for plant modifications to be completed prior to startup following the next refueling outage, which is scheduled to begin on April 1, 1986. Our initial evaluation indicates that it will not be possible to prepare a modification package (design, engineering, procurement, construction, testing, etc.,) prior to startup following the next refueling outage.

Based on this fact, it is requested that we be granted interim relief from the requirements of your January 13, 1986 letter that requires the installation of pump flow instrumentation on certain pumps. At a minimum, it is requested that relief from this requirement be granted until the Cycle 4 refueling outage scheduled for late 1987 or early 1988.

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March 11, 1986

In addition, we would like to discuss the denied requests dealing with flow measurement on certain pumps by requesting that; (1) NRC, under the provisions of 10 CFR 50.55a(g)(6)(i), give due consideration to the burden upon the licensee as a result of denying the relief requests and imposing requirements that are impracticable to accomplish, and that; (2) NRC reevaluate FPL's determinations that conformance with certain code requirements is impractical using information that FPL will submit to NRC by July 31, 1986. This additional information will provide detailed determinations of impracticality for each of the specific pumps in question and ask for reconsideration of our previous relief requests.

Due to the potential impact on outage planning and duration, we appreciate your prompt consideration of this request.

Very truly yours,


C. O. Woody
Group Vice President
Nuclear Energy

COW/RJS/MAS/eh

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