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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 WOODY, C. O. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Informs that technical evaluation justifying B61013 request for relief from performing quarterly flow measurements for safety-related pumps specified in Section XI of ASME Code will be submitted by early June 1987, per 870304 meeting.

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MARCH 23 1987

L-87-134

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, D.C. 20555

Gentlemen:

Re: St. Lucie Unit 2
 Docket No. 50-389
 Inservice Testing of
Certain Safety-Related Pumps

By letter dated October 13, 1986, Florida Power & Light Company (FPL) requested relief from performing quarterly flow measurements for certain pumps as specified in the 1980 Edition through the Winter 1980 Addenda of Section XI of the ASME Boiler and Pressure Vessel Code. As a basis for this request, FPL showed that flow measurement cannot be performed for some of the pumps because the pumps do not contain flow measurement devices and that quarterly flow measurement for the remaining pumps is impractical without design modifications. FPL also stated that it is not required under 10CFR 50.55a(g) to make design modifications to permit performance of the flow measurement tests under Section XI of the ASME Code.

By letter dated February 10, 1987, the NRC denied FPL's relief request and directed FPL to install certain flow measurement devices for the pumps by the next refueling outage for St. Lucie Unit 2. Also, in that same letter, FPL was given the opportunity to request an appeal meeting.

On March 4, 1987, FPL met with the NRC to appeal the decision in NRC's letter of February 10, 1987. At this meeting, FPL restated its position that quarterly flow measurements were impossible or impractical absent design modifications, and that FPL was not required under 10CFR 50.55a(g) to modify its design. Following this presentation, NRC agreed that 10CFR 50.55a(g) does not require a licensee to make design modifications to accommodate changes in later editions of Section XI of the ASME Code. Additionally, NRC requested that FPL provide NRC with an enhanced technical evaluation which addresses the impracticality of performing flow measurements specified in Section XI of the ASME Code (including an evaluation of the adequacy of the tests proposed by FPL in its October 13, 1986 letter and an evaluation of whether installation of the flow measurement devices identified in the NRC's letter of February 10, 1987, would provide additional assurance of pump operational readiness). Finally, NRC agreed to a deferral of installation of the flow measurement devices identified in NRC's letter of February 10, 1987, until the second upcoming refueling outage and agreed to reconsider FPL's relief request following a review of FPL's technical evaluation.

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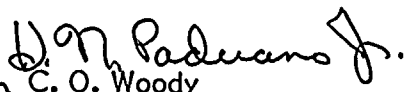
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FPL agreed to provide the technical evaluation requested by NRC at the March 4, 1987 meeting. FPL currently plans to submit this evaluation to the NRC by early June, 1987.

Please contact us if there are any questions concerning this subject.

Very truly yours,

for 
C. O. Woody
Group Vice President
Nuclear Energy

COW/MSD/pm

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

