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SUBJECT: Forwards addl info re Items 2.1 & 2.2 of Generic Ltr 83-28 concerning Salem ATWS event, per 870210 request.

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FLORIDA POWER & LIGHT COMPANY

MAY 26 1987

L-87-178

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

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Items 2.1 and 2.2 of Generic Letter 83-28
Salem ATWS Event

By letter L-86-396, dated October 2, 1986, Florida Power & Light Company (FPL) responded to NRC questions concerning Items 2.1 and 2.2 of Generic Letter 83-28, Salem ATWS Event. By letter dated February 10, 1987, the NRC requested additional information to continue its review of this topic. Attached is FPL's response to this request.

Please contact us if you have additional questions concerning this response.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/EJW/gp

Attachment

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

A055
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REQUEST FOR ADDITIONAL INFORMATION
ITEM 2.1 (PART 1) AND 2.2 (PART 1) OF GENERIC LETTER 83-28
"EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE"
ST. LUCIE PLANT, UNITS 1 AND 2

Review of the licensee's responses dated November 8, 1983 and October 2, 1986 for Items 2.1 (Part 1) and 2.2. (Part 1) of Generic Letter 83-28, disclosed the need for additional information as follows:

A. Item 2.1 (Part 1) Equipment Classification (Reactor Trip System Components)

Based on the licensee's submittal, we find that the licensee's program for component classification is not functional on the component level for reactor trip components. The licensee's response, therefore, does not meet the requirements of Item 2.1 (Part 1) of Generic Letter 83-28 and is unacceptable. This item requires licensees to confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities, including maintenance, work orders, and parts replacement.

FPL RESPONSE

Components whose function is required to trip the reactor are identified as safety-related on documents and information handling systems used in the plant. These documents and control systems ensure that work documents and procedures contain requirements commensurate with the safety classification of the system or component.

B. Item 2.2 (Part 1) Equipment Classification (Programs for All Safety-Related Components

1. Item 2.2.1 - Program

The licensee's responses do not confirm that all safety-related components are designated as safety-related on plant documents such as procedures, system descriptions, test and maintenance instructions, operating procedures, and in information handling systems so that personnel performing activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints.

The licensee needs to state that their equipment classification conforms with the above staff position. If all safety-related components are not designated as safety-related on the relevant documents, the licensee should specifically describe the exceptions and provide a justification for such exceptions for staff review.

FPL RESPONSE

Safety-related components are identified as safety-related on documents and information handling systems used in the plant. These documents and other control systems ensure that work documents and procedures contain requirements commensurate with the safety classification of the system or components.

2. Item 2.2.1.2 - Information Handling System

The licensee's responses do not confirm that the information handling system includes a list of safety-related equipment and that procedures exist which govern its development and validation.

The licensee needs to state that their equipment classification program conforms with the above staff position.

FPL RESPONSE

Generic Letter 83-28 required that FPL submit to the NRC a description of the information handling system used to identify safety-related equipment. The Position of Item 2.2.1.2 of GL 83-28 (reproduced below) used a computerized equipment list only as an example of an information handling system used to identify safety-related components. St. Lucie does not maintain a master safety- related equipment list. The FSAR original design documents and controlled plant drawings are used to identify safety-related components such that appropriate quality requirements are included in procedures, plant work orders and procurement documents.

Position 2.2.1.2

A description of the information handling system used to identify safety-related components (e.g., computerized equipment list) and the methods used for its development and validation. (Emphasis added)

3. Item 2.2.1.5 - Design Verification and Procurement

The licensee's responses do not confirm that their procurement specifications require that the appropriate design verification and qualification testing be provided by the supplier.

The licensee needs to state that their procurement specifications conforms with the above staff position.

FPL RESPONSE

St. Lucie's procurement specifications for the purchase of materials and components require design verification and qualification testing be provided by the supplier, as appropriate, to the component or material. This practice is implemented, controlled and audited through FPL's Quality Assurance instructions, special Quality Assurance documents and site specific procedures.