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SUBJECT: Advises that util will propose amend to License NPF-16 by 870930 to surveillance requirements of Tech Spec 4.7.1.5 to change time required for full MSIV closure. Amend will make MSIV Spec consistant w/philosophy used in MFIV Spec.

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

Gentlemen:

Re: St. Lucie Unit 2
Docket No. 50-389
Main Feedwater Isolation Valve Closure Time

By letter L-83-349, dated June 17, 1983, Florida Power & Light Company proposed a license amendment requesting various administrative/editorial changes and a change to the steam generator pressure/temperature limit. By letter L-84-148 dated June 4, 1984, FPL proposed a license amendment for Cycle 2 operation which bounded "stretch" power operation (i.e. to upgrade rated core power from 2560 MWt to 2700 MWt). "Stretch" power operation was proposed subsequently by FPL letter L-84-354, dated November 21, 1984. The bounding operation proposal of June 4, 1984, was issued as Amendment No. 8 on November 9, 1984, and "stretch" power was approved by Amendment No. 9 dated March 1, 1985. By letter dated March 11, 1987, (E. G. Tourigny to C. O. Woody) the NRC issued Amendment No. 18 to the St. Lucie Unit 2 Facility Operating License No. NPF-16. This amendment consisted of changes requested in FPL's June 17, 1983, application, with the exception of the proposal to revise the main feedwater isolation valve (MFIV) closure time to 4.2 seconds. The staff noted that it believes the MFIV closure time of Technical Specification 4.7.1.6 should be 4.0 seconds instead of 4.2 seconds and took no action on this aspect of the application. FPL was requested to respond to its intended disposition of this issue.

The issue of MFIV closure time proposed in our June 17, 1983, submittal had been superceded by our "stretch" power amendment proposals. The MFIV full closure time of 5.15 seconds currently specified in the Technical Specifications continues to be a correct value as determined by St. Lucie Unit 2 accident analyses. As a result, FPL does not propose to revise this Technical Specification.

FPL believes that the OPERABILITY of the MFIVs is verified by performance of testing which confirms the ability of these valves to shut within the time limit required by the "stretch" power accident analyses. This value is 5.15 seconds for St. Lucie Unit 2. If full valve closure is accomplished within this time frame, regardless of valve stroke time, then the accident analyses, which assume MFIV closure, are confirmed. The ability of the MFIVs to isolate within 5.15 seconds is conducted and verified periodically in accordance with Specification 4.3.2.3.

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an FPL Group company

Main Steam Isolation Valve (MSIV) Technical Specification 4.7.1.5 requires full MSIV closure within 5.6 seconds, considering only valve stroke time. The MSIV full closure time assumed by the "stretch" power accident analyses is 6.75 seconds. If full valve closure of the MSIVs is accomplished within this time frame, regardless of valve stroke time, then the accident analyses which assume MSIV closure are confirmed. The ability of the MSIVs to isolate within 6.75 seconds is conducted and verified periodically in accordance with Specification 4.3.2.3.

Based on the above, FPL will propose an amendment by September 30, 1987 to the St. Lucie Unit 2 Facility Operating License to revise the Surveillance Requirements of Specification 4.7.1.5 to change the time required for full MSIV closure to 6.75 seconds. This amendment will make MSIV Specification consistent with the philosophy used in establishing the MFIV Specification.

If additional information is required on this topic, please contact us.

Very truly yours,

JW Dickey for

C. O. Woody
Group Vice President
Nuclear Energy

COW/EJW/gp

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