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 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
 WOODY, C. D. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Advises that util will be reporting missed surveillances in monthly operating repts rather than in LERs, per changes to 10CFR50.72 & 50.73 & NUREG-1022.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 1
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

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JUNE 10 1987

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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
Reporting of Missed Surveillances

The purpose of this letter is to inform NRC of Florida Power & Light Company's (FPL) position on reporting of missed surveillances at St. Lucie Units 1 and 2. FPL has reviewed the development of and subsequent changes to 10 CFR 50.72 and 50.73 regarding the LER system. In the Statement of Considerations for the Proposed Rule (Federal Register/Vol. 47, No. 86/Thursday, May 6, 1982), it states "Failure to comply with a Surveillance Requirement need not be reported as an LER, but should be tabulated in the Monthly Operating Report." Furthermore, FPL's review of NUREG - 1022, License Event Report System and its supplements, has not identified any direct guidance which is inconsistent with reporting by means of the Monthly Operating Report.

Although FPL has reported missed surveillances as LERs, FPL believes that a tabulation of missed surveillances in the Monthly Operating Report is a more appropriate method for reporting, and in fact was the intended method. Therefore, FPL will be reporting missed surveillances in the Monthly Operating Reports.

Should NRC disagree with this method of reporting, your prompt notification would be appreciated.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/RJS/gp

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

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