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 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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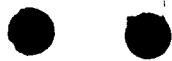
SUBJECT: Forwards enhanced "Technical Evaluation Flow Measurement of Centrifugal Pumps in Fixed Resistance Sys at St Lucie Plant," per NRC 870304 meeting. Meeting concerned appeal of NRC 870210 denial of relief request from ASME Section XI.

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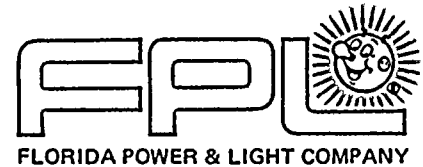
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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for ensuring the integrity of the financial statements and for providing a clear audit trail. The text also mentions that proper record-keeping is essential for identifying trends and anomalies in the data.

2. The second part of the document focuses on the role of internal controls in preventing fraud and errors. It highlights that a strong internal control system is necessary to ensure that all transactions are properly authorized and recorded. The text also discusses the importance of segregation of duties and the need for regular monitoring and evaluation of the control system.

3. The third part of the document discusses the importance of transparency and communication in financial reporting. It emphasizes that clear and concise reporting is essential for providing stakeholders with the information they need to make informed decisions. The text also mentions that transparency is a key factor in building trust and confidence in the organization.



JULY 31 1987

L-87-318

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

Gentlemen:

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

By letter dated January 13, 1986, the NRC denied a Florida Power & Light Company (FPL) relief request from the requirements of IWP-4600 of ASME Section XI regarding flow measurement. By letter dated October 13, 1986, FPL submitted a revised request for relief from performing quarterly flow measurements for certain pumps as specified in the 1980 Edition through the Winter 1980 Addenda of Section XI. 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 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 revised 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 10 CFR 50.55a(g) to modify its design. Following the FPL appeal presentation, the 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). The purpose of this letter is to transmit the requested enhanced technical evaluation.

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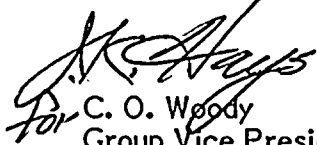
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Page two

Revised relief requests are being developed consistent with the determinations of impracticality supported in the attached technical evaluation. The revised relief requests will be submitted to the NRC at a later date.

If there should be any questions, please contact us.

Very truly yours,



For C. O. Woody
Group Vice President
Nuclear Energy

COW/MSD/gp

Attachment

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

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