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ACCESSION NBR: 8709150201 DOC. DATE: 87/09/11 NOTARIZED: NO DOCKET #
 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Submits addl info for 870904 application for amend to
 License NPF-16 to revise Tech Spec Surveillance Requirement
 4.4.5.2, "Steam Generator Tube Sample Selection & Insp."

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MEMORANDUM FOR THE DIRECTOR, FBI
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SEPTEMBER 11 1987

L-87-377

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

Gentlemen:

Re: St. Lucie Unit 2
Docket No. 50-389
Steam Generator Tube Sample Selection and Inspection

By letter L-87-369 dated September 4, 1987 Florida Power & Light Company (FPL) submitted a proposed license amendment to revise St. Lucie Unit 2 Technical Specification Surveillance Requirement 4.4.5.2, Steam Generator Tube Sample Selection and Inspection. This license amendment request proposed to add a new section which excludes tubes in the area affected by the diagonal support straps (batwings) from the sample selection. If excluded from the sample selection, FPL proposed to examine 100% of this area.

The proposed Technical Specification amendment will establish an area of the steam generator that will be subjected to a 100% inspection criteria. However, if that 100% inspection option is used, the tube damage results will not be used to calculate expansion of the initial inspection program. The remainder of the tubes will be inspected, and expansion calculated, under the existing requirements of the current Technical Specifications.

The steam generators at St. Lucie Unit 2 are subject to a tube damage phenomena caused by the mechanical wear of the thin diagonal support straps against the steam generator tube walls. This wear is most pronounced in the center of the tube bundle, nearest to the open (un-tubed) area of the steam generator. This mechanical wear has been documented at other similar nuclear units. The vendor of these units has performed substantial laboratory testing and analytical work to define the problem, and provide a prediction of future damage growth and progression rate.

These predictions have been made for St. Lucie Unit 2 and for other steam generators of the same basic design. To date, the inspections at these units have shown that the wear progression model is accurate in predicting the bounding area of damage.

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It is understood, however, that the damage will continue for the life of the steam generator. While the prediction is that only approximately 300 tubes may eventually require plugging, FPL is faced with continually detecting damage and plugging tubes each refueling cycle. These degraded and defective tubes under the current Technical Specifications would be used to calculate the expansion requirements of the examinations. Since FPL intends to examine 100% the affected area in any case, the examination expansion will force FPL into large examinations of tubes totally unaffected by this problem. This is clearly not the intent of the Technical Specifications.

FPL has reviewed the outage schedule for St. Lucie Unit 2 and has determined that NRC approval of this license amendment will be required by October 7, 1987.

FPL first identified to the NRC the potential for an unnecessary expansion of the Steam Generator examination plan by the Steam Generator inspection requirements as defined in the Unit's Technical Specifications in late July 1987. In a phone conversation between the NRC and FPL in early August 1987, FPL described in more detail its perceived conflict between the intent and the requirements of the Technical Specifications. The NRC was in agreement that the inspection plan, as proposed by FPL, was more conservative than the current Technical Specifications and that a license amendment to revise the Technical Specification may not be needed. The staff did request, however, that FPL document its plans for these inspections. This documentation was submitted to the NRC by FPL letter L-87-351 dated August 21, 1987.

On August 27, 1987, FPL participated in a conference call with NRC Headquarters and Region II to discuss FPL's August 21, 1987 letter. The NRC again reiterated its position that FPL's proposed Steam Generator inspection plan is more restrictive than the Technical Specification inspection requirements in the affected area. The staff did state, however, that it may ask FPL to expand its inspection boundary in the batwing area and that it would need additional information on the modeling of the batwing areas that FPL was using to develop its inspection plan. FPL will be submitting this information in the near future.

As a result of the August 27, 1987 telephone conference, FPL asked the staff on September 1, 1987 if it was still of the opinion that a license amendment was not required. The staff stated that, after further review of FPL's documentation, the Technical Specifications could not be interpreted to bound FPL's proposal and that a license amendment would be required to implement the proposed inspection plan. The proposed license amendment was submitted to the NRC by FPL letter L-87-369, dated September 4, 1987.



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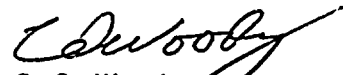
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As detailed above, FPL and the NRC have discussed this issue at length over the last few months. In spite of good faith efforts on the part of both FPL and the NRC to resolve this issue, it has recently been determined that a license amendment will be required. FPL submitted this license amendment within three days of this determination.

FPL requests that the NRC process this proposed license amendment by any means permissible under 10CFR 50.91 (short of emergency situation) which the staff determines necessary to permit license amendment issuance by October 7, 1987.

If further information is required, please contact us.

Very truly yours,



C. O. Woody
Group Vice President
Nuclear Energy

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

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