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ACCESSION NBR: 8803010103 DOC. DATE: 88/02/25 NOTARIZED: NO DOCKET #
 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
 CONWAY, W.F. Florida Power & Light Co.
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SUBJECT: Forwards comments re details of SALP Repts 50-335/87-28 & 50-389/87-27.

DISTRIBUTION CODE: IE40D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2
 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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FEBRUARY 25 1988

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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
Inspection Report Nos. 335/87-28 and 389/87-27
Systematic Assessment of Licensee Performance

Florida Power & Light Company has reviewed the Systematic Assessment of Licensee Performance (SALP) report dated January 20, 1988.

We concur that performance at the St. Lucie Plant continued to be excellent and directed toward the safe operation of the plant.

We have attached other clarifying comments concerning the details of the report for your consideration.

Very truly yours,

W. F. Conway
Senior Vice President - Nuclear

WFC/GRM/dh

Attachment

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

GRM23.SALP

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RE: Docket Nos. 50-335 & 50-389

Attachment

St. Lucie Plant SALP Clarifying Comments

Radiological Controls Section, page 12

This section includes a reference to the licensee's program to reduce carbon steel pipe wastage and mentions large amounts of sludge being removed during outages. It should be pointed out that, while they are relatively large, the amounts of sludge in Unit 1 have been steadily decreasing. Further, Unit 2 has had very small amounts over its 3 cycle history.

For example:	PSL #1	approx.	3000 lbs.	Cycle 5
		approx.	1500 lbs.	Cycle 6
		approx.	700 lbs.	Cycle 7
	PSL #2	approx.	250 lbs.	Cycles 1,2,3 (combined)

Licensing Activities Section

A phrase was included on page 34 which notes FPL could have been more responsive to Generic Letter 87-02 "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors." FPL feels that the action taken has been consistent with the currently available seismic information. Communication with the NRC is continuing on this issue.

On page 36, FPL feels that implementation of the Integrated Living Schedule would not be beneficial for St. Lucie Plant. There are several systems currently in use that not only follow licensing commitments, but track all project modifications and provide synchronization with the FPL budget process.

Capital work has been declining at St. Lucie. With a record of timely completion of licensing commitments and an aggressive management program to reduce and control plant changes, St. Lucie Plant's capital budget project backlog has declined from \$38M in 1987 to \$19M in 1988. It is our opinion that the existing systems and programs in place are adequate and effective in managing plant modifications.

FPL believes implementation of the Integrated Living Schedule at St. Lucie would not provide additional benefit to FPL or the NRC at this time.