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 AUTH. NAME AUTHOR AFFILIATION  
 CONWAY, W. F. Florida Power & Light Co.  
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SUBJECT: Responds to NUREG-0737, Item II.K.3.17.

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

Gentlemen:

Re: St. Lucie Unit 2  
 Docket No. 50-389  
Response to NUREG-0737, Item II.K.3.17

In 1981, Florida Power & Light Company (FPL) responded to NRC Question 440.34 which discussed NUREG-0737, Item II.K.3.17, "Report on Outages of Emergency Core Cooling System Licensee Report and Proposed Technical Specification Changes", by committing to a detailed report including the outage dates and lengths of outages for all Emergency Core Cooling Systems (ECCS) after five years of operation. This commitment was accepted by the NRC in NUREG-0843, Subsection 22.2, dated October 1, 1981 and documented by FPL in the St. Lucie Unit 2 FSAR subsection 6.3.4.3.

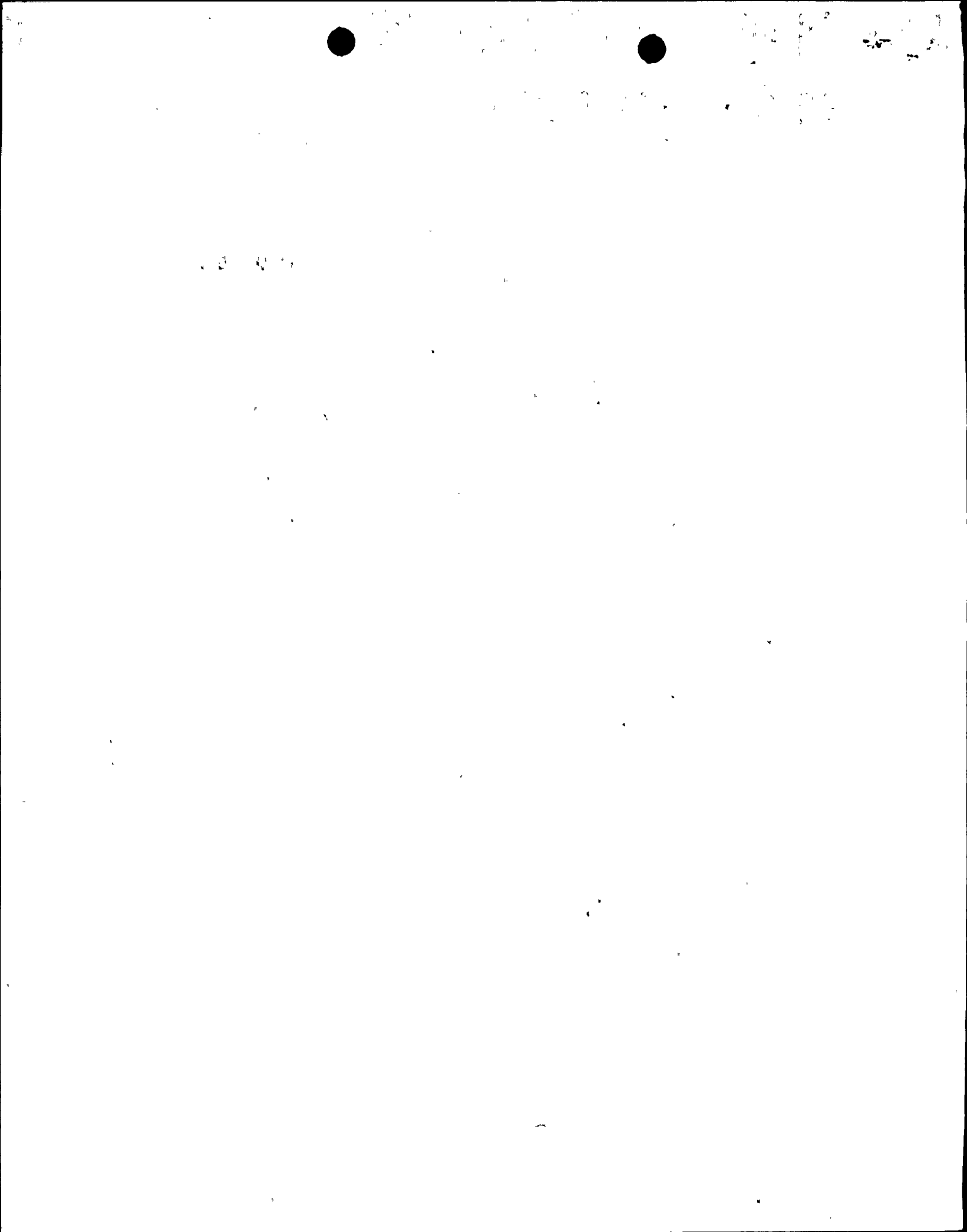
NUREG-0737, Item II.K.3.17, requires licensees to submit a detailed report containing outage data for the previous five years of operation along with proposed improvements for emergency core cooling (ECC) equipment. St. Lucie Unit 2 received its low power operating license on April 6, 1983; the five year reporting period specified in NUREG-0737 II.K.3.17 would end, therefore, on April 6, 1988. Subsequent to the issuance of NUREG-0737 the NRC issued 10 CFR 50.73 on July 26, 1983, (48FR 33850-33859), which set forth the guidelines for the development and content of Licensee Event Reports (LERs). One of the results of 10 CFR 50.73 has been the almost industry-wide membership in the Institute of Nuclear Power Operations (INPO) Nuclear Plant Reliability Data System (NPRDS). FPL believes that the NPRDS reporting of ECCS equipment failures provides the NRC with a better

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on-line reporting system and obviates the FSAR ECCS outage five year reporting commitment. Any significant problems with ECC systems are reported to the NRC in accordance with 10 CFR 50.73.

FPL has reviewed the publicly available record on this item and has determined that this approach has been found acceptable by the NRC at other facilities based upon compliance with 10 CFR 50.73 and membership in INPO's NPRDS.

FPL will continue to report significant ECCS equipment failures to the NRC in accordance with 10 CFR 50.73. FPL will update the St. Lucie Unit 2 FSAR to reflect its revised position.

Very truly yours,

  
W. F. Conway  
Acting Group Vice President  
Nuclear Energy

WFC/EJW/gp

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

