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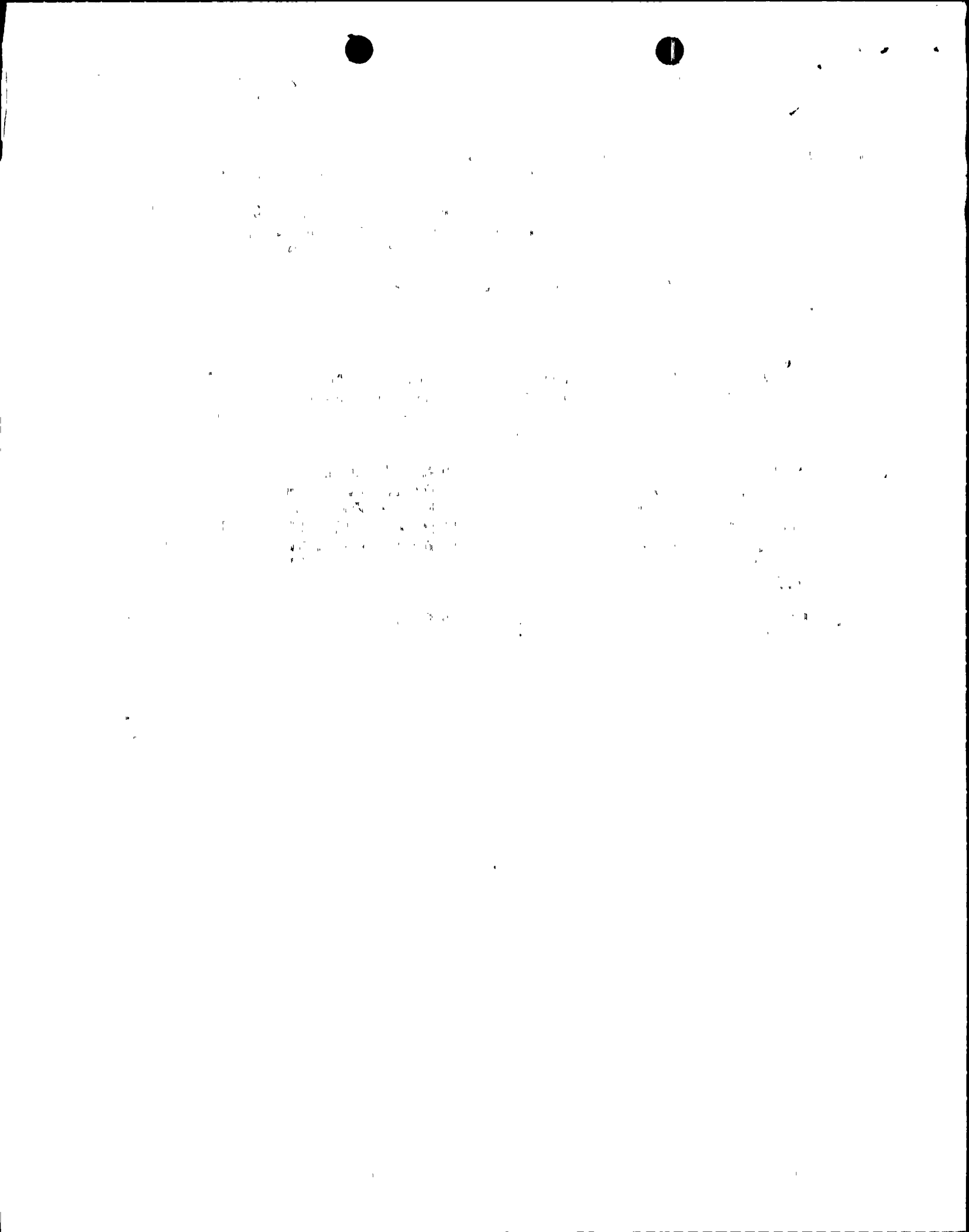
ACCESSION NBR: 8805110135 DOC. DATE: 88/05/04 NOTARIZED: NO DOCKET #
 FACIL: 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
 AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W. F. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Discusses 871127 request for amend to incorporate revised pressure/temp limits & results of recent low temp overpressure protection analysis into Tech Specs.

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L-88-201
10 CFR 50.90

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

Gentlemen:

Re: St. Lucie Unit 2
Docket No. 50-389
P/T Limits and LTOP Analysis

By letter L-87-482, dated November 27, 1987, Florida Power & Light Company (FPL) submitted a proposed license amendment for St. Lucie Unit 2. The purpose of the proposed license amendment is to incorporate revised Pressure/Temperature (P/T) limits and the results of a recent Low Temperature Overpressure Protection (LTOP) analysis into the Technical Specifications for St. Lucie Unit 2. New P/T limit curves were generated for six operating periods starting at 4 Effective Full Power Years (EFPY) out to 32 EFPY (in intervals of 4-10, 10-15, 15-20, 20-25, 25-30 and 30-32 EFPY). Approval of the proposed amendment was requested prior to the plant reaching 4.0 EFPY (now projected to occur no earlier than May 23, 1988), since the P/T curves currently included in the Technical Specifications expire at that time.

Attachment 5 to the proposed license amendment described the methodology used by FPL in calculating the adjusted reference temperature (ART) values used in generating the P/T limits out to 32 EFPY. The attachment also demonstrated that these ART values are sufficiently conservative relative to the temperatures calculated according to the guidelines of draft Regulatory Guide 1.99, Revision 2. FPL, in fact, employed the guidelines of draft Regulatory Guide 1.99, Revision 2 in calculating ARTs for use in generating P/T limits for St. Lucie Unit 2. An exception to the Regulatory Guide procedures in FPL's approach was the use of calculated fluence values at 1/4T and 3/4T locations rather than the draft Regulatory Guide 1.99, Revision 2 correlation based on surface fluence. The net result was ART values at the 3/4T location that were not in agreement with those ART values calculated using the draft Regulatory Guide procedures (i.e. more than 5% difference).

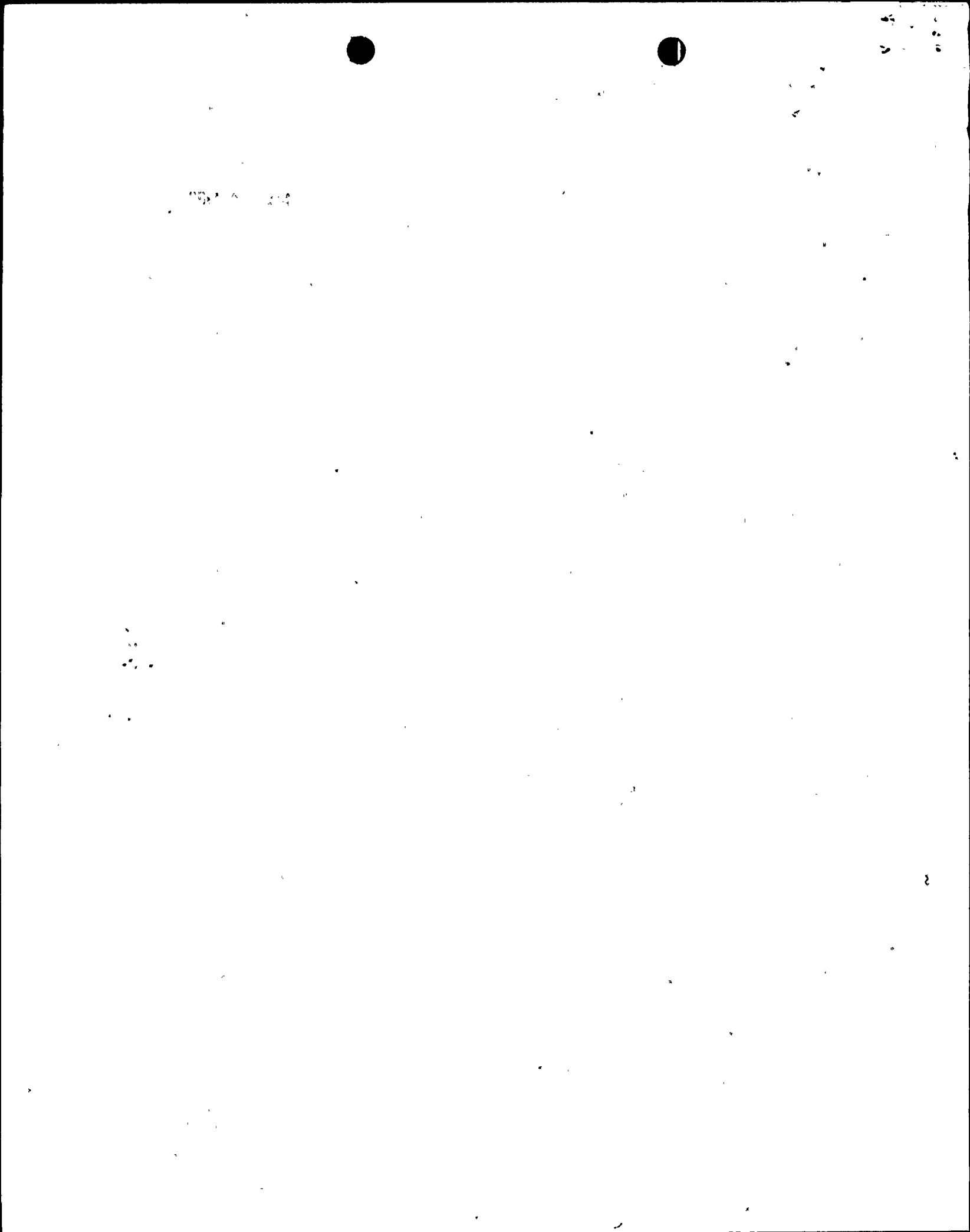
FPL's position on the adjusted reference temperatures used in generating P/T limits for St. Lucie Unit 2 is that the values calculated are sufficiently conservative with respect to the guidelines of draft Regulatory Guide 1.99, Revision 2. This

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position is based on the comparison of ART values provided for St. Lucie Unit 2 with ART values determined within the guidelines of the draft Regulatory Guide and considering the current position of the NRC with respect to the established credibility of the surveillance data.

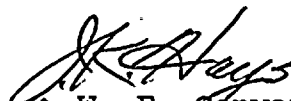
On March 24, 1988, FPL, Combustion Engineering (CE) (the St. Lucie Unit 2 Nuclear Steam Supply System vendor and P/T-LTOP analysis contractor) and the NRC held a conference call to discuss FPL's application. At that time, the NRC Staff stated that it did not accept FPL's piecemeal application of the draft Regulatory Guide Revision 2 methodology. The NRC gave FPL two options: 1) accept NRC's calculated 6 EFPY curve (which correlates with FPL's 10 EFPY curve) or 2) submit a new curve using the draft Regulatory Guide 1.99, Revision 2 methodology verbatim. The Staff also stated additional concerns with proposed action time revision for ACTION statement b)2) for Technical Specification 3.4.9.3 and the Technical Specification BASES revisions proposed by FPL.

In a telephone conversation with the Staff on April 12, 1988, FPL requested that the NRC Staff continue its technical review of FPL's ART methodology. The Staff agreed to continue the review without a re-application by FPL. The Staff stated that it would complete this review prior to St. Lucie Unit 2 reaching 6 EFPY. As a result of the time required for the Staff to conduct its review of FPL's ART methodology, in the interim, FPL, while not committing to the methodology presented in draft Regulatory Guide 1.99 Rev. 2, will accept P/T curves limited to 6 EFPY. FPL will be available to the NRC Staff to assist in the review of the ART methodology.

In a telephone conversation on April 25, 1988, the Staff stated that it would not accept FPL's proposed ACTION statement revision for this license amendment but would require FPL to retain the current ACTION time. The staff did state, however, that it would continue its review of FPL's proposed revision after issuance of this amendment for generic applicability.

FPL is also available for technical clarification, meetings or other required interactions on this topic.

Very truly yours,


for 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

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