



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 22, 1988

Docket No.: 50-389

Mr. W. F. Conway
Vice President-Nuclear
Florida Power and Light Company
Post Office Box 14000
Juno Beach, Florida 33408

Dear Mr. Conway:

SUBJECT: PROPOSED AMENDMENT FOR CHANGING THE ACTION STATEMENT OF TECHNICAL SPECIFICATION SECTION 3.7.1.6 FROM 4 TO 72 HOURS TO RESTORE INOPERABLE MFIV TO OPERABLE - ST. LUCIE PLANT, UNIT 2 (TAC NO. 66853)

By letter dated December 22, 1987, the Florida Power and Light Company (FPL) proposed a change to the Technical Specifications (TS) for the St. Lucie Plant, Unit 2. The proposed amendment would change the action statement of Limiting Condition for Operation (LCO) 3.7.1.6 and Bases 3/4.7.1.6 to allow 72 hours to restore an inoperable open main feedwater isolation valve (MFIV) to operable. The current requirement for return to operability is 4 hours.

We have reviewed your request and supporting information contained in the attachments. We do not agree with your assessment. Due to removal of the main feedwater check valve from the plant design and its replacement with a second main feedwater isolation valve, the LCO for main feedwater line isolation valves, LCO 3.7.1.6, was incorporated in the TS to protect against the failure of one MFIV to close with the other MFIV in that line being inoperable (i.e., stuck open). To preclude operation for extended periods with an MFIV known to be stuck in the open position, a 4-hour action time was incorporated in the LCO. The staff does not expect this action time to represent a reasonable time to repair an inoperable MFIV, but rather to represent the importance the staff places on this MFIV function.

According to your accompanying Safety Evaluation, justification for the proposed change is based on (1) your estimate that in the event of a Design Basis Event (DBE) during either 4 or 72 hours of operation with an inoperable, open MFIV, the likelihood of occurrence of the sequence of events required to result in a failure to terminate feed flow is very low, and (2) your argument that an extension of the MFIV action time to 72 hours provides the same time to repair an inoperable MFIV as is allowed to repair other safeguards systems, such as an inoperable Emergency Core Cooling System, Containment Core Spray System, Fan Coolers, Intake Cooling System, or Component Cooling Water System. The staff does not accept either argument as justification for the proposed change.

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Your estimate of the low likelihood of occurrence is based on generic estimates of the MFIV fail open frequency and the main steam line break (MSLB) frequency. Due to the uncertainties incorporated in the estimate and its questionable applicability to St. Lucie Plant, Unit 2, the staff does not accept it as a basis for changing the LCO 3.7.1.6 action statement. Furthermore, the staff considers comparison of the MFIV action statement with those of the above-mentioned safeguards systems inappropriate. Since it is the staff's view that, from a functional point of view, the MFIV action statement should be compared with those of the main steam isolation valves (MSIVs) and containment isolation valves, for which the action time is 4 hours, the staff does not accept your comparison, although for containment isolation both MFIVs are not needed because this is a GDC-57 penetration. It is the staff's view, however, that both valves are essential to assure mitigation of the consequences of a main feedwater line break (MFLB) or MSLB, especially to limit feedwater addition to a faulted steam generator in the event of an MSLB.

This issue was discussed with FPL during three telephone conferences in February and March 1988. During those conferences the staff explained why the proposed amendment was unacceptable and pointed out that the staff would only consider plant-specific justifications for changing the action statement. The staff suggested that FPL needed to identify unique MFIV design or configuration features and demonstrate that they justify the proposed change. FPL has not provided a satisfactory justification.

For the reasons stated above, the proposed changes to TS Section 3.7.1.6 and Bases 3/4.7.1.6 are denied. The Commission has filed the enclosed Notice of Denial of Application for Amendment to Facility Operating License with the Office of the Federal Register for publication.

Sincerely,
/S/

Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

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OGC No legal objection
subject to satisfaction
of my note of 6/16/88
S H Lewis

Mr. W. F. Conway
Florida Power & Light Company

St. Lucie Plant

cc:

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