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SUBJECT: Forwards addl info re Generic Ltr 83-28, Item 2.2.1.2, "Info Handling Sys," per 880422 request.

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Item 2.2.1.2 of Generic Letter 83-28
Information Handling System

By letter dated April 22, 1988, the NRC Staff requested additional information to continue its review of the above topic.

By letter L-88-220, dated May 12, 1988, Florida Power & Light Company (FPL) stated that it would respond to this information request by July 29, 1988.

Attached is FPL's response to this request.

Please contact us if there are questions concerning this response.

Very truly yours,

W. F. Conway
W. F. Conway
Senior Vice President - Nuclear

WFC/EJW/gp

Attachment

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

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ATTACHMENT

GENERIC LETTER 83-28

ITEM 2.2.1.2 INFORMATION HANDLING SYSTEM

NRC Requested Information

The licensee should confirm that the program for classification of safety-related equipment includes an information handling system that is used to identify safety-related components. The response should confirm that this information handling system includes a listing of safety-related equipment and components and that procedures exist which govern its development verification and validation.

NRC Evaluation

The licensee's response states that a master safety-related equipment list is not maintained but the safety-related components are identified in the FSAR, P & I Diagrams, Valve Lists and Instrument Lists. These lists and drawings were developed during plant design and construction and are now maintained as controlled documents. The approval authority for revising specific technical, FSAR and PC/M items impacting the quality program is vested in the FPL Engineering Organization.

The licensee's program includes an information handling system which contains several lists that identify safety-related items. The submittal does not make clear that these lists are complete to the component level, that they do not overlap or conflict and that these lists are governed by identical criteria and procedures so that the listings are maintained and distributed to users as information for all safety-related components.

NRC Conclusion

The licensee's response is not complete. They should confirm that the lists are complete to the component level, they do not overlap or conflict and these lists are governed by identical criteria and procedures so that the listings are maintained and distributed to users as a complete, official, consistent and unambiguous source of classification information for all safety-related components.

FPL Response to NRC Conclusion

The St. Lucie Units 1 and 2 Updated Final Safety Analysis Reports (UFSAR) and controlled plant drawings (P & I diagrams, valve lists, instrument lists, control wiring diagrams, etc.) are complete such that all safety-related components are correctly identified as safety-related using approved FPL work practices. These documents are maintained and distributed to users as a complete, official, unambiguous source of classification information for all safety-related components.

In addition, FPL is in the process of establishing a Total Equipment Data Base (TEDB) for all equipment (component level) installed in both St. Lucie Units. This data base will include the classification of safety-related equipment and is to be maintained by FPL's Engineering Department in accordance with approved FPL Quality Instructions.

It should be noted that the NRC has reviewed St. Lucie's current classification system (Inspection Report Numbers 50-335/85-19 and 50-389/85-19, dated August 19, 1985) and concluded that St. Lucie's program for equipment classification included "(p)lant and component control for classification of structures, systems and components as safety-related..."