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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 CONWAY, W.F. Florida Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to deviations noted in Insp Repts 50-335/88-08 & 50-389/88-08.

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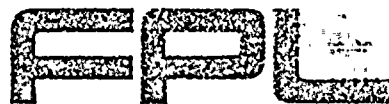
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SEPTEMBER 22 1988

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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 88-08
Reply To Notice of Deviation

Florida Power & Light Company has reviewed the subject Notice of Deviation dated August 26, 1988 and pursuant to NRC letter (J. N. Grace to W. F. Conway) dated August 26, 1988, the response is attached.

Very truly yours,

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

WFC/GRM/gc

Attachment

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

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DEVIATION:

NRC Generic Letter 82-33 (GL 82-33) required that licensees develop basic emergency response capabilities including the upgrade and implementation of emergency operating procedures (EOPs) using an NRC approved procedures generation package. NUREG 0899 provides guidance and an acceptable method of developing plant-specific technical guidelines and a writer's guide. NUREG 0899 further provides that the licensee's plant-specific guidelines should be based on the generic guidelines provided by the licensee's owners group and the deviations from the generic guidelines should be fully documented and justified.

By letter dated April 15, 1983, the licensee committed to implement the improvements in their emergency response capabilities. They further committed to conform with the guidance provided by NUREG 0899 and the owner group's generic guidelines (CEN-152).

In deviation from the above, the following discrepancies were found (389/88-08-01):

- A. CEN-152 specifies an RCP NPSH curve in a figure entitled "typical post-accident pressure-temperature limits," which was included in many sections of the guidelines. The St. Lucie EOPs, with few exceptions, did not include the RCP NPSH requirements. This omission may cause the operator to violate NPSH limits resulting in damage to RCPs and the subsequent degrading of the post-accident RCS heat removal capability of the plant.
- B. The licensee failed to (1) provide information on the assumptions used to adapt the generic guidelines to the St. Lucie plants, (2) provide a description of how the St. Lucie plants differ from the generic plant, and (3) provide the technical basis and/or justification for significant differences between the generic guidelines (CEN-152) and the St. Lucie procedure generation package.

RESPONSE TO DISCREPANCY A

- 1. The reason for deviation from CEN-152 was that this curve was overlooked when developing the new procedures.
- 2. FPL has contacted the NSSS vendor to supply an appropriate NPSH curve for the St. Lucie EOPs.
- 3. Once the new curve is obtained, the curve will be incorporated into the next revision to the EOPs.
- 4. The above steps should resolve this deviation.
- 5. The NPSH curve will be included in the next revision to the EOPs. The next revision to the EOPs is scheduled for June, 1989.

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RESPONSE TO DISCREPANCY B

1. The reason for this deviation was that these discrepancies were overlooked during the development of the St. Lucie EOPs.
2. FPL has developed resolutions for each discrepancy noted.
3. These discrepancies will be corrected at the next revision to the EOPs. Backup information, giving more detail for the deviations to CEN-152, will be attached as an appendix to the Step Verification Document. This document is, in effect, the Plant specific guidelines. This backup information will include items such as Plant setpoints included in drawings and Technical Specifications, correspondence, and any other technical information sources.
4. The above steps should resolve this deviation.
5. The next revision to the St. Lucie EOPs is scheduled for June, 1989.