





NOVEMBER 2 1988

L-88-486  
10 CFR 50.55a

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

Gentlemen:

Re: St. Lucie Unit No. 2  
Docket No. 50-389  
Relief from Parts of ASME Section XI

By letter dated January 13, 1986, the NRC denied a Florida Power & Light Company (FPL) relief request from the requirements of IWP-4600 of ASME Section XI regarding flow measurement. By letter dated October 13, 1986, FPL submitted a revised request for relief from performing quarterly flow measurements for certain pumps as specified in the 1980 Edition through the Winter 1980 Addenda of Section XI. As a basis for this request, FPL showed that flow measurement cannot be performed for some of the pumps because the pumps do not contain flow measurement devices and that quarterly flow measurement for the remaining pumps is impractical without design modifications to permit performance of the flow measurement tests under Section XI of the ASME Code.

By letter dated February 10, 1987, the NRC denied FPL's revised relief request and directed FPL to install certain flow measurement devices for the pumps by the next refueling outage for St. Lucie Unit 2. Also, in that same letter, FPL was given the opportunity to request an appeal meeting.

On March 4, 1987, FPL met with the NRC to appeal the decision in the NRC's letter of February 10, 1987. At this meeting, FPL restated its position that quarterly flow measurements were impossible or impractical absent design modifications, and that FPL was not required under 10 CFR 50.55a(g) to modify its design. Following the FPL appeal presentation, the NRC requested that FPL provide NRC with an enhanced technical evaluation which addresses the impracticality of performing flow measurements specified in Section XI of the ASME Code. Per letter L-87-318, dated July 31, 1987, FPL submitted the enhanced technical evaluation.

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U. S. Nuclear Regulatory Commission  
L-88-486  
Page 2

On December 14, 1987, the NRC requested additional information with respect to the enhanced technical evaluation. FPL responded to the request for additional information per letter L-88-48, dated January 28, 1988, and letter L-88-147, dated March 23, 1988. Additionally, on April 5, 1988, the NRC requested further information concerning the same subject. FPL responded to this request for information per letter L-88-223, dated May 13, 1988.

Following the March 4, 1987 appeal meeting, FPL was granted interim relief until the St. Lucie Unit 2 Cycle 4/5 refueling outage, as long as, FPL continued to perform monthly differential pressure testing during the period of relief. Per letter L-87-235, dated June 4, 1987, FPL informed the NRC that they would continue to perform monthly differential pressure testing during the interim relief period.

The purpose of this letter is to inform you that St. Lucie Unit 2 will be shutting down for the Cycle 4/5 refueling outage as early as January 1989. FPL requests that the staff complete its review prior to the upcoming Cycle 4/5 refueling outage. However, if the review cannot be completed, FPL requests that the NRC extend the interim relief. It is the intent of FPL to continue monthly differential pressure testing until the above issue is resolved.

If there should be any questions regarding this subject, please contact us.

Very truly yours,

  
W. F. Conway  
Senior Vice President - Nuclear

WFC/MSD/cm

cc: Malcolm L. Ernst, Acting Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant

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