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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.
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SUBJECT: Forwards response to NRC 881118 request for addl info re
 conformance to Reg Guide 1.97.

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DECEMBER 23 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
Request for Additional Information
Conformance to Regulatory Guide 1.97,
Steam Generator Wide Range Water Level Instrumentation
(TAC Nos. 64333 and 64334)

By letter dated November 18, 1988 (E. G. Tourigny to W. F. Conway), you requested additional information concerning the Florida Power & Light Company (FPL) submittals of December 30, 1986, June 17, 1987, and November 4, 1987 relating to the above subject. Attached is FPL's response to this request for additional information.

Should there be further questions, please contact us.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/MSD/cm

Attachment :

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

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Request for Additional Information
Regulatory Guide 1.97 Instrumentation

1. a. Identify the Emergency Operating Procedures (EOP) which use the wide range steam generator (SG) level instruments as indicators to mitigate the consequences of any plant abnormal events.

Response

All EOPs at St. Lucie Units 1 and 2 reference wide range steam generator (SG) level indications, in accordance with CEN-152 "Emergency Procedures Guidelines". Wide range SG level indication is used to satisfy one condition for reactor coolant system (RCS) heat removal safety function verification.

- b. Assess the effect of loss of the wide range SG level instruments on the effectiveness of EOP to achieve its long term cooling for the plant.

Response

The contingency action in the EOPs on loss of wide range SG level indication is the automatic actuation of the Auxiliary Feedwater (AFW) pumps. The AFW pumps are started by an Auxiliary Feedwater Actuation Signal (AFAS) from the environmentally qualified narrow range SG level indication instruments to achieve long term heat removal for the reactor coolant system (RCS). The AFAS would occur at a SG level greater than the specified wide range SG level of the EOPs and would continue until the AFAS cleared. The AFAS would occur with narrow range SG level observable and would not clear until the narrow range SG level was 10% greater than the AFAS initiation setpoint. The effectiveness of the EOPs to achieve long term cooling is not impacted in that either:

- 1) SG level will remain within narrow range SG level indication, or
- 2) in the absence of narrow range SG level indication, AFW flow would have been initiated.

In either case, the above functions, in conjunction with the environmentally qualified primary plant instrumentation for temperature and pressure, would be used to confirm that RCS heat removal is occurring.