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SUBJECT: Responds to NRC Bulletin 88-011, "Pressurizer Surge Line Thermal Stratification."

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MARCH 6 1989

L-89-82

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
Response to NRC Bulletin No. 88-11
Pressurizer Surge Line Thermal Stratification

As requested by the subject NRC Bulletin, the purpose of this letter is to inform the staff of actions taken to resolve NRC concerns associated with the issue of pressurizer surge line thermal stratification. The Combustion Engineering Owners Group (CEOG) became aware of this issue in April 1987 when INPO issued a draft SER on surge line thermal cycling observed in a German nuclear plant. The CEOG proceeded to initiate a data collection program in June 1987 followed by actual data collection activities at two CEOG plants in June and August 1988.

In October 1988, the CEOG authorized the ongoing CEOG program "Reduction and Analysis of Pressurizer Surge Line Data Collected from CEOG Plants", to address surge line thermal stratification concerns. NRC Bulletin 88-11 was subsequently issued in December 1988. Action No. 1.b requested that, within four months of receipt of the Bulletin, licensees of plants in operation over ten years demonstrate that the pressurizer surge line meets the applicable design codes and other regulatory commitments for the licensed life of the plant. The Staff suggested that this could be accomplished by performing a plant specific or generic bounding analysis. Licensees of plants in operation less than ten years were requested to complete the analysis within one year.

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L-89-82
Page two

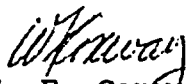
The NRC Staff and the CEOG met on February 13, 1989. During this meeting, the CEOG presented the goals and scope of the ongoing CEOG surge line program which included a presentation of actual plant data and a discussion on the issue of thermal striping. The CEOG then requested relief from the four month/one year schedule requirement in Requested Action 1.b and suggested that the CEOG program be allowed to proceed as scheduled.

As a result of this meeting, the CEOG and NRC Staff agreed on several action items to be completed as follows:

1. The CEOG will perform a preliminary bounding evaluation of CEOG surge lines using actual data collected from CEOG plants by July 1, 1989. This activity will address the intent of Requested Action 1.b.
2. Actual plant data will be used to define loading conditions for input to the fatigue and stress evaluations.
3. The CEOG agreed to meet with NRC staff to discuss the load definitions prior to finalizing the bounding analysis described in item 1 above.

Florida Power & Light Company is participating in the CEOG program for St. Lucie Units 1 and 2 and agrees to support the above action items and alternative schedule for responding to NRC Bulletin 88-11 Action 1.b. Reporting Requirement 2 in the Bulletin is considered to be appropriately addressed by this letter.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/MSD/re

cc: Stewart D. Ebnetter, Regional Administrator, Region II,
USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant