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 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to Generic Ltr 88-14, "Instrument Air Supply Sys Problems Affecting Safety-Related Equipment."

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MARCH 14 1989

L-89-98
10 CFR 50.54(f)

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
Instrument Air Supply System Problems Affecting
Safety-Related Equipment (Generic Letter 88-14)

By letter L-88-539 dated December 27, 1988, Florida Power & Light Company (FPL) provided its phased schedule for responding to Generic Letter (GL) 88-14.

Attached is FPL's first set of responses to GL 88-14 for St. Lucie Units 1 and 2.

Please contact us if you have any questions about this submittal.

Very truly yours,


W. F. Conway
Senior Vice President - Nuclear

WFC/EJW/cm

Attachments

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

8903230302 890314
PDR ADCK 05000335
P PNU

EJWSRE

Acc
||

STATE OF FLORIDA)
) ss.
COUNTY OF PALM BEACH)

W. F. Conway being first duly sworn, deposes and says:

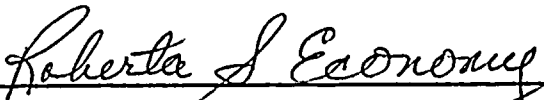
That he is Senior Vice President- Nuclear of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.



W. F. Conway

Subscribed and sworn to before me this
14 day of March, 1989.



NOTARY PUBLIC, in and for the County
of Palm Beach, State of Florida



Notary Public, State of Florida
My Commission Expires June 1, 1989
Bonded Thru Troy Fain - Insurance, Inc.

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ATTACHMENT

St. Lucie Units 1 and 2

Generic Letter 88-14

Instrument Air Supply System Problems Affecting Safety-Related Equipment

- Item 1. Verification by test that actual instrument air quality is consistent with the manufacturer's recommendation for individual components served.

Response

FPL is in the process of upgrading the instrument air systems at St. Lucie Units 1 and 2 by adding new instrument air compressors and air dryers. On completion of these upgrades at both units (currently scheduled for completion by June 1989), air quality will be established which will meet or exceed the individual components' air quality requirements, as determined by FPL.

- Item 2. Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air.

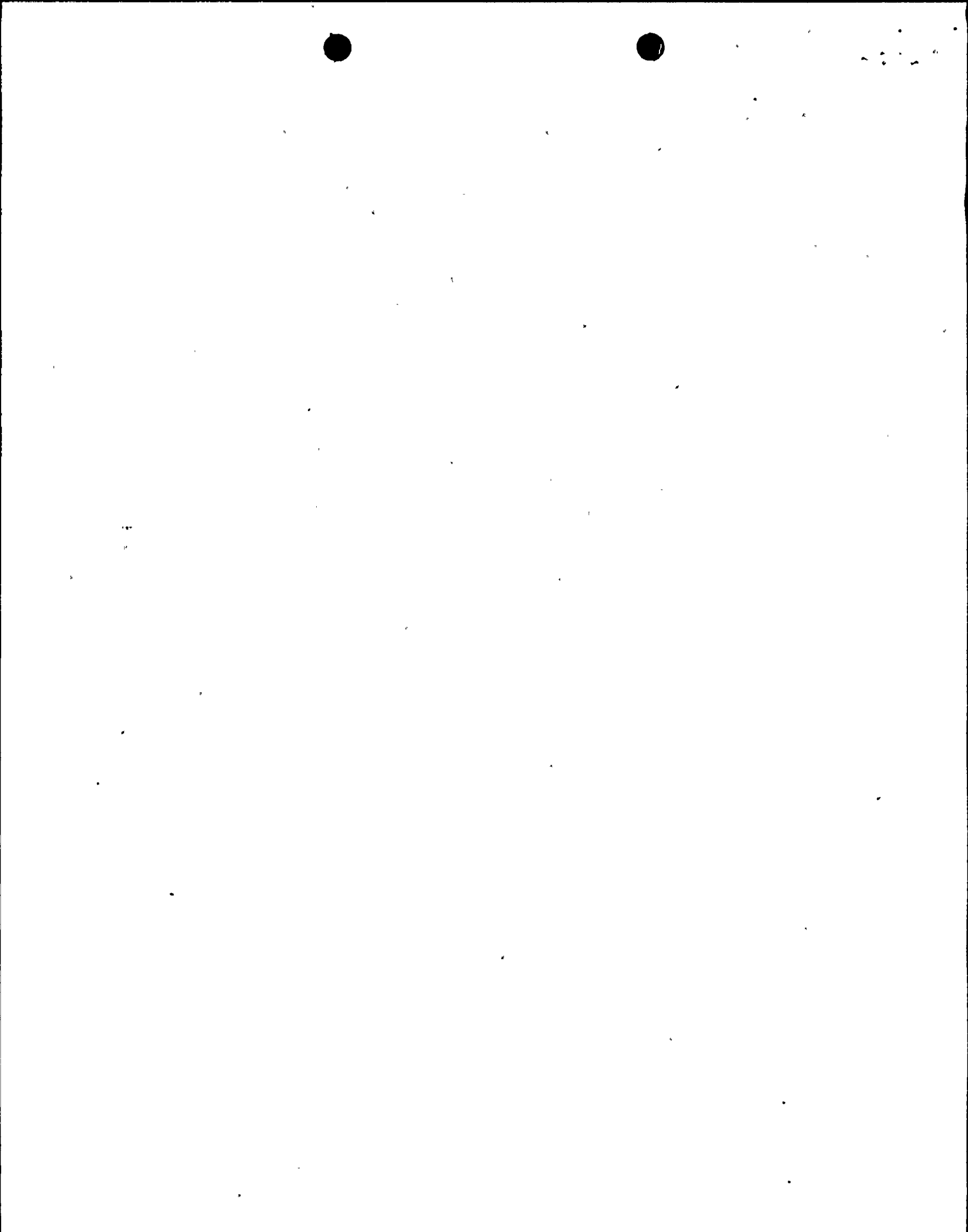
Response

Maintenance practices, emergency procedures and training have been reviewed and are considered to be adequate to ensure that safety-related equipment will function as intended on a loss of instrument air. To ensure proper instrument air quality, preventative maintenance instructions for the new instrument air compressors and associated equipment include desiccant inspection, filter inspections, moisture separator drain inspection and compressor lubrication/inspection. Procedures are being revised to reflect the above discussed instrument air systems upgrade.

St. Lucie Plant operators have received training on the operation of the new air compressors and dryers.

- Item 3. Verification that the design of the entire instrument air system including air or other pneumatic accumulators is in accordance with its intended function ...

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Response

The instrument air system design bases for each unit, as specified in each unit's updated Final Safety Analysis Report (UFSAR), were reviewed against system design. This review verified that the designs of both new instrument air systems, including accumulators, meet the design bases requirements. The capacity and purification capabilities of the air process equipment have been designed to provide air of a quality recommended by Instrument Society of America Standard ISA S7.3.

Item 3 (continued),

... including verification by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of the normal instrument air system ...

Response

FPL has verified by pre-operational test that all air-operated safety-related components at St. Lucie Unit 2 perform as expected on loss of instrument air. FPL has completed about 95% of this verification at St. Lucie Unit 1; the verification and/or testing will be completed by the end of the next scheduled Unit 1 refueling outage, i.e., about May 1990.

Item 3 (continued),

... This design verification should include an analysis of current air operated component failure positions to verify that they are correct for assuring required safety functions.

Response

FPL has reviewed system piping and instrument drawings and other engineering documents for St. Lucie Units 1 and 2. This review has verified that air operated component failure positions are the correct fail-safe or safety-related positions required for accident mitigation in accordance with design.

Item In addition to the above, each licensee/applicant should provide a discussion of their program for maintaining proper instrument air quality.

Response

FPL's program to maintain instrument air quality will consist of a periodic sampling program. The parameters to be sampled will include dew point, particulates and hydrocarbons. These parameters will be trended by the System Engineer who will initiate specific corrective action, if required. FPL plans on implementing this instrument air quality program by June 1989.

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