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 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389

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SUBJECT: Extends commitment date for correcting discrepancies & deviations noted in IRs 50-335,389/88-08 to 891031.

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L-89-210

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

Re: St. Lucie Unit 1 and 2
Docket Nos. 50-335 and 50-389
Extension of Commitment Date
Inspection Report 88-08

Gentlemen:

NRC Inspection Report 50-335/88-08 listed the following four Inspector Follow-Up Items (IFIs) as a result of the inspection in the area of Emergency Operating Procedures (EOPs).

- IFI 389/88-08-01 Correction of technical discrepancies contained in EOPs
- IFI 389/88-08-02 Correction of discrepancies noted during plant walkdowns
- IFI 389/88-08-03 Correction of lesson plans and completion of EOP training when EOPs revised
- IFI 389/88-08-04 Correction of human factors discrepancies contained in EOPs

The Inspection Reports also identified the two following deviations.

Deviation 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.

Deviation B The licensee failed to (1) provide information on the assumptions used to adapt the generic guidelines to the St. Lucie Plant, (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.

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The EOPs are currently undergoing revision to be in accordance with CEN 152 Revision 3, Combustion Engineering Emergency Procedure Guidelines. Florida Power & Light committed to incorporate the IFIs and correct the deviations during the revision process, which was scheduled for completion on June 30, 1989. FPL will not be able to meet the commitment date and requests an extension.

The extension is requested because the original assessment underestimated the scope of the project. The magnitude of the revisions was far more extensive than realized. The experience gained in simulator validation of major revisions involving EOPs 9, 10, and 15 pointed out a clear need and benefit to validate EOPs 1, 2, 3, 4, 5, and 6 which was not included in the original assessment.

The revision and validation process, coupled with the training of licensed and non-licensed operators through the requalification program on the new revisions, requires an extension of the original EOP implementation date from June 30, 1989 to a new date of October 31, 1989. This new date also coincides with the completion of Licensed Operator Requalification Session 89-04, which will complete training on the new revisions.

Very truly yours,



C. O. Woody
Acting Senior Vice President - Nuclear

COW/GRM/cm

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

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