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 FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
 . 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co. 05000389
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 WOODY,C.O. Florida Power & Light Co.
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SUBJECT: Responds to NRC Bulletin 88-011 "Pressurizer Surge Line Thermal Stratification."

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 TITLE: Bulletin 88-11 Pressurizer Surge Line Thermal Stratification

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JULY 31 1989

L-89-276
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
NRC Bulletin 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 following actions have been taken:

Actions Requested: 1.a.

Florida Power & Light Company (FPL) was requested to conduct a visual inspection (ASME, Section XI, VT-3) of the St. Lucie Plant pressurizer surge lines at the first available cold shutdown which exceeded seven days. Per letter L-89-91 dated April 4, 1989, FPL notified the Staff that the St. Lucie Unit 2 visual inspection had been completed and no gross discernable distress or structural damage was identified. St. Lucie Unit 1 was shutdown in June, 1989 for a mid-cycle outage. The visual inspection of the pressurizer surge line has been completed at St. Lucie Unit 1 and no gross discernable distress or structural damage was identified in the line. This completes Actions Requested: 1.a. for St. Lucie Units 1 and 2.

Action Requested: 1.b.

FPL was requested that, within four months of receipt of the bulletin, plants in operation over ten years (i.e., St. Lucie Unit 1) 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. Plants in operation less than ten years were requested to complete the analysis within one year (i.e., St. Lucie Unit 2).

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In October, 1988, the Combustion Engineering Owners Group (CEOG) initiated a program to address the issue of surge line thermal stratification in certain Combustion Engineering-designed plants. Per letter L-89-82 dated March 6, 1989, FPL notified the Staff of its intent to participate in the CEOG program for St. Lucie Units 1 and 2 and agreed to support the CEOG actions and alternative schedule for Action Requested: 1.b.

Per letter CEOG-89-470 dated July 27, 1989, the CEOG submitted Topical Report, CEN-387-P, "Pressurizer Surge Line Flow Stratification Evaluation", to the NRC addressing the issue of surge line thermal stratification and responding to bulletin Action Requested: 1.b. FPL concurs with the results in CEN-387-P which demonstrate that the structural integrity of all CEOG plants' (which include St. Lucie Units 1 and 2) surge lines are maintained for the forty year design life of these piping systems. This completes Action Requested: 1.b. for St. Lucie Units 1 and 2.

Action Requested: 1.c.

Not Applicable

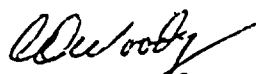
Action Requested: 1.d.

Not Applicable

In summary, FPL has completed the applicable Requested Actions and Reporting Requirements of NRC Bulletin 88-11.

Should there be any questions, please contact us.

Very truly yours,


C. O. Woody
Acting Senior Vice President - Nuclear

COW/MSD/gp

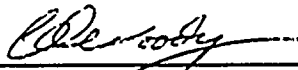
cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant

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

C. O. Woody being first duly sworn, deposes and says:

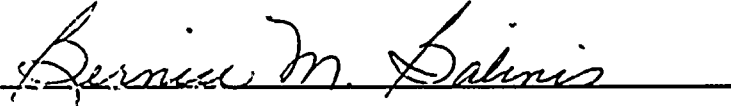
That he is Acting Senior Vice President - Nuclear, of Florida Power and Light Company, the Licensee herein;

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.



C. O. Woody

Subscribed and sworn to before me this
31st day of July, 1989.



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

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP SEPT 18, 1989
RENDED THRU GENERAL INS. UND.

My Commission expires _____