



FPL

AUGUST 16 1989

L-89-303

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
 Inspection Report Nos. 50-335/89-13 and 50-389/89-13
Systematic Assessment of Licensee Performance

Florida Power & Light Company (FPL) has reviewed the Systematic Assessment of Licensee Performance (SALP) report dated July 10, 1989.

We concur that the overall performance of the St. Lucie Plant was excellent during this assessment period. FPL is sensitive to the NRC concern about complacency at St. Lucie Plant. Our goal is to continue to improve our performance in all rating areas.

We have attached other clarifying comments concerning the details of the report for your consideration.

Very truly yours,

C. O. Woody
 Acting Senior Vice President - Nuclear

COW/EJW/gp

Attachment

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

~~8908230141~~ 3 pp.

ATTACHMENT

ST. LUCIE UNITS 1 AND 2
SALP CLARIFYING COMMENTS

Radiological Controls, Section B, Pages 10 thru 13

FPL concurs with the NRC's acknowledgement of an improving trend in the performance of the Health Physics Department. This department will work towards continued improvement.

Security and Safeguards, Section E, Pages 17 and 18

FPL concurs with the NRC's identification of several areas for improvement in the area of Security and Safeguards. FPL is aggressively pursuing resolution of problems in these areas.

Engineering/Technical Support, Section F.1, Page 20

FPL disagrees with the NRC's statement that "The failure of the simulator staff to recognize the potential plant operational impact of... (a design deficiency in the Auxiliary Feedwater actuation signal (AFAS) circuit which could result in erroneous isolation of auxiliary feedwater)... indicates a disconnect between the simulator staff and plant operations." FPL feels that, as shown below, this issue was resolved promptly by quick and proper responses from both the Training and Operations Departments.

This design deficiency was identified during the week of September 12, 1988, and highlighted by the NRC in an exit meeting on September 16. The September 16 NRC exit meeting followed the NRC written examinations and simulator exercise for operating licenses for St. Lucie conducted during the week of September 12-16 (St. Lucie Examination Report 50-335/OL-88-01). Prior to this exit meeting, the simulator AFAS response to a specific steam generator tube rupture (SGTR) scenario, which occurred the week of September 12, was actively under internal review by St. Lucie Plant staff. This internal review resulted in the St. Lucie Operations Department issuing six Temporary Changes (TCs) to the affected Emergency Operating Procedures (EOPs) (3 for St. Lucie Unit 1 and 3 for St. Lucie Unit 2) on September 16. These TCs added a caution statement addressing the possibility of interrupted feed to the available steam generator under natural circulation cooldown with a single steam generator. On September 22, St. Lucie Unit 2 TCs were approved by the St. Lucie Plant Facility Review Group (FRG); the St. Lucie Unit 1 TCs were approved by the FRG on September 29.

ST. LUCIE UNITS 1 AND 2
SALP CLARIFYING COMMENTS (con't)

In parallel to the above, on September 16, Request for Engineering Assistance (REA) 88-037, "Isolation of Non-Faulted Steam Generator During Simulated Natural Circulation Cooldown" was issued by St. Lucie Plant staff to FPL's Nuclear Engineering Department. On September 21, the St. Lucie Plant Training Department met with FPL Nuclear Engineering to discuss the potential for a simulator anomaly. It was recognized at that meeting that the simulator AFAS setpoints for rupture identification did not agree with plant/Technical Specification values for AFAS SGTR identification. As a result of that meeting, and on September 22, the Training Department wrote Discrepancy Report (DR) #425 on the St. Lucie simulator addressing these differences. Simulator testing with revised setpoints (matching those of the Technical Specifications) resulted in no change in simulator response.

FPL Nuclear Engineering provided a draft response to REA 88-037 on November 16, 1988 and a final response on January 27, 1989. The recommendations of this REA response resulted in no plant changes nor additional changes to procedures other than those implemented in September 1988.

FPL believes that the above indicates that there has been, and continues to be, a strong link between the Simulator and Operations staffs.