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AUTH.NAME AUTHOR AFFILIATION
GOLDBERG,J.H. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to GL 89-04, "Guidance on Developing Acceptable Inservice Testing Programs."

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OCTOBER 3 1989

L-89-359
10 CFR 50.55a(g)

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

Gentlemen:

Re: St. Lucie Unit Nos. 1 and 2
Docket Nos. 50-335 and 50-389
Generic Letter 89-04, Guidance on
Developing Acceptable Inservice Testing Programs

NRC Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," issued April 3, 1989, requested that certain licensees review their most recently submitted Inservice Testing Programs (IST) and implementation procedures against the positions delineated in Attachment 1 of GL 89-04, and by October 3, 1989 confirm, in writing, their conformance to the stated positions.

As stated in GL 89-04, the NRC will be issuing a safety evaluation report in the near future on the plants listed on Table 1 of the generic letter. As a result, those plants need not respond with a confirmation letter. St. Lucie Unit 2 is listed on Table 1 and, therefore need not respond with a confirmation letter.

The St. Lucie Unit 1 IST Program and implementing procedures have been reviewed against the positions delineated in GL 89-04. As a result of this review, changes will be necessary to its Program.

Currently, the St. Lucie Unit 1 IST Program is in compliance with GL 89-04, Position 4, in that, all pressure isolation valves listed in the plant Technical Specifications are listed in the IST Program as Category A or A/C valves. Also, St. Lucie Unit 1 is in compliance with GL 89-04, Position 8 concerning the starting point for the time period in the plant Technical Specifications ACTION statements. Position 7 is not applicable to St. Lucie Unit 1.

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Due to the complexity of the balance of the review, as well as the time required to upgrade both the IST Program Plan and associated procedures, FPL expects to submit a revised IST Program by January 3, 1990. If FPL cannot comply with the remaining positions of GL 89-04 for reason of design limitations or personnel hazards, the appropriate relief requests will be submitted.

It has been determined that numerous testing procedures will need to be revised. This represents a significant effort compounded by a Unit 1 refueling outage currently scheduled for February 1990. Based on this, revised testing procedures reflecting the positions outlined in GL 89-04 will be implemented such that testing performed after May 15, 1990, will conform to the revised IST program as submitted on January 3, 1990.

Should there be any questions, please contact us.

Very truly yours,

J. H. Goldberg
Executive Vice President

JHG/MSD/gp

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