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ACCESSION NBR: 9001300450      DOC. DATE: 90/01/23      NOTARIZED: YES      DOCKET #  
 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  
 AUTH. NAME                      AUTHOR AFFILIATION  
 GOLDBERG, J.H.                  Florida Power & Light Co.  
 RECIPIENT NAME                RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC Bulletin 89-003 re potential loss of required shutdown margin during refueling operations.

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 TITLE: Bulletin 89-03, Potential Loss of Required Shutdown Margin During Refu

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L-90-27  
10 CFR 50.54(f)

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  
NRC Bulletin 89-03  
Potential Loss of Required Shutdown  
Margin During Refueling Operations

On November 21, 1989, NRC issued Bulletin 89-03, "Potential Loss of Required Shutdown Margin During Refueling Operations", to alert licensees to the potential loss of required shutdown margin during movement and placement of highly reactive fuel during refueling operations.

In addition, the bulletin requested all licensees to review procedures and training to assure adequate shutdown margin is maintained during all refueling operations.

Florida Power & Light Company has completed the requested review for St. Lucie Units 1 and 2 and provides the attached.

Should there be any questions, please contact us.

Very truly yours,

J.H. Goldberg  
Executive Vice President

JHG/MSD/vmg

Attachment

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

9001300450 900123  
PDR ADOCK 05000335  
R PDC

ATTACHMENT

ST. LUCIE UNITS 1 AND 2 RESPONSE TO BULLETIN 89-03

**REQUESTED ACTION: 1.**

Assure that any intermediate fuel assembly configuration (including control rods) intended to be used during refueling is identified and evaluated to maintain sufficient refueling boron concentration to result in a minimum shutdown margin of approximately 5%.

FPL RESPONSE:

Refueling boron concentration is maintained to result in a minimum shutdown margin of 5% for intermediate fuel or control element assembly (CEA) configurations. This is accomplished by the use of a Fuel Assembly Storage Table. This table is supplied on a cycle specific basis by the fuel vendor and assures that allowed intermediate locations are less reactive than the final core configuration.

**REQUESTED ACTION: 2.**

Assure that fuel loading procedures only allow those intermediate fuel assembly configurations that do not violate the allowable shutdown margin and that these procedures are strictly adhered to.

FPL RESPONSE:

Compliance with operating procedures assures use of the Fuel Assembly Storage Table so that sufficient shutdown margin is maintained for intermediate fuel assembly configurations.

**REQUESTED ACTION: 3.**

Assure that the staff responsible for refueling operations is trained in the procedure recommended in Item 2 above and understands the potential consequences of violating these procedures. This training should include the fundamental aspects of criticality control with higher enriched fuel assemblies.

FPL RESPONSE:

The St. Lucie Reactor Engineering Staff which assists in overseeing the refueling operation has received training on the requirements of fuel loading procedures which assure sufficient shutdown margin is maintained, and are aware of the consequences of violations to this procedure. In addition, criticality control with higher enriched fuel assemblies was discussed during this training.

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

J. H. Goldberg being first duly sworn, deposes and says:

That he is Executive Vice President, 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.

J. H. Goldberg  
J. H. Goldberg

Subscribed and sworn to before me, this

23 day of January, 1990.

Roberta S. Economy

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

My Commission expires Notary Public, State of Florida  
My Commission Expires June 1, 1993  
Bonded Thru Troy Fair - Insurance Inc.