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FACIL:50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co. 05000335
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SUBJECT: Responds to NRC 891115 ltr re potentially invalid leak detection tests used as alternative to ASME Code.

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P.O. Box 14000, Juno Beach, FL 33408-0420

FEBRUARY 08 1990

L-90-57

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
Potentially Invalid Leak
Detection Tests Used as an
Alternative for Required ASME,
Section XI Hydrostatic Tests

On November 15, 1989, the NRC, Region II issued a letter (S. D. Ebneter to J. H. Goldberg) stating that pressure test results conducted pursuant to the NRC approved topical report, HAFA 135 (P), "Instrumented Inspection Technique as an Alternative to Hydrostatic Testing Requirements for ASME Code Class 1, 2 and 3 Systems and Components," dated April 1985, may be invalid. Florida Power & Light Company (FPL) was requested to evaluate its examination procedures and the Instrumented Inspection Technique (IIT) data. If tests were confirmed to be invalid, FPL was requested to identify all ASME systems and components subject to the hydrostatic pressure testing requirements of ASME, Section XI which were tested using the IIT and to determine whether the affected systems could be judged functionally OPERABLE. If the tests were determined to be valid, it was requested that FPL inform the Office of Nuclear Reactor Regulation of the basis for this determination and provide a brief description of the component or system and the date for which the IIT tests were conducted on that component or system.

FPL's requests to use the IIT test method were approved on November 8, 1985, (D. G. Eisenhut to J. W. Williams) for St. Lucie Unit 1 and November 17, 1988, (H. N. Berkow to W. F. Conway) for St. Lucie Unit 2. IIT tests for St. Lucie Units 1 and 2 have been conducted in strict conformance with the NRC approved alternative IIT testing methodology, and include aspects which ensure the technical adequacy of the testing procedure and, therefore, the validity of the test results.

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1/1

IIT testing at St. Lucie Units 1 and 2 requires a standard ASME VT-2 type visual examination while the system is under test conditions. Additionally, leak measuring devices (LMDs) are used to quantify and verify leakage on boundary valves. Use of acoustic monitoring is included as a diagnostic aid in detecting the source of leakage and not as a replacement for VT-2 examinations. Use of HAFA expertise has been limited to use of their VT-2 certified personnel during some 1985/86 examinations until FPL personnel could complete their VT-2 certification requirements. Otherwise, St. Lucie has used HAFA equipment (long term lease of 6 LMDs) and has conducted IIT testing with FPL approved procedures and certified FPL personnel.

Attached are two tables containing the St. Lucie Unit 1 and St. Lucie Unit 2 IIT test information (Tables 1 and 2, respectively) as requested above. Included in the tables are the test number, the system tested, and the date of testing. FPL believes that the IIT testing methodology applied at St. Lucie Units 1 and 2 is performed at a level of quality acceptable to the NRC, and is confident that all IIT testing performed at St. Lucie Units 1 and 2 was in accordance with the approved HAFA Topical Report 135 (P).

Please contact us if there are any questions concerning this information.

Very truly yours

DA Sager

D. A. Sager
Vice President
St. Lucie Plant

DAS/MSD/gp

Attachments

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

Table 1: Inservice Pressure Test Program - St. Lucie Unit 1

Number	Class	Boundary Description	Date
1-IPT-02	1, 2	Safety Injection Discharge Header	12/22/85
1-IPT-04	2	Letdown	12/1/85
1-IPT-05	2	Charging Suction	12/6/85
1-IPT-06	2	Charging Discharge	12/10/85
1-IPT-08	2	Boric acid Pump Discharge	6/12/86
1-IPT-12	2	A LPSI Suction	2/19/87
1-IPT-13	2	B LPSI Suction	3/3/87
1-IPT-14	2	A Containment Spray Header	9/23/86
1-IPT-15	2	B Containment Spray Header	9/30/86
1-IPT-17	2,3	Aux Feed A Discharge	7/30/87
1-IPT-18	2	Aux Feed B Discharge	8/3/88
1-IPT-19	2	Aux Feed C Discharge	8/4/87
1-IPT-20	2	A & B LPSI Discharge	8/15/86
1-IPT-21	2	A HPSI Suction	9/9/86
1-IPT-23	2	HPSI Pump to Aux Hdr	8/28/86
1-IPT-24	2	HPSI Pump to Discharge Header	8/22/86
1-IPT-26	2	NaOH Lines	8/20/87
1-IPT-28	2	BAM Pump Suction	4/29/87
1-IPT-29	2	A Charging PP to check	10/1/87
1-IPT-33	2	B Charging PP to check	10/5/87
1-IPT-34	2	C Charging PP to check	10/2/87
1-IPT-35	2	Fuel Pool Cooling	10/7/86
1-IPT-36	2	A, B, and C Aux Feed Suction	8/13/87
1-IPT-39	2	A, B, C Aux Feed Return to CST	4/8/87
1-IPT-41	2	LPSI Header MOV to Check Valve	8/27/88

Table 2: Inservice Pressure Test Program - St. Lucie Unit 2

Number	Class	Boundary Description	Date
2-IPT-02	2	Safety Injection Discharge Header	11/20/87
2-IPT-05	2	Charging Suction	5/2/86
2-IPT-06	2	Charging Discharge	4/25/86
2-IPT-08	2	Boric Acid Pump Discharge	10/26/87
2-IPT-14	2	A Containment Spray Header	10/30/86
2-IPT-15	2	B Containment Spray Header	10/27/86
2-IPT-17	2	Aux Feed A Discharge	12/9/86
2-IPT-18	2	Aux Feed B Discharge	12/10/86
2-IPT-19	2	Aux Feed C Discharge	12/11/86
2-IPT-20	2	A & B LPSI Discharge	10/16/86
2-IPT-21	2	A HPSI Suction	11/18/86
2-IPT-22	2	B & C HPSI Suction	11/20/86
2-IPT-23	2	HPSI Pump to Aux Hdr	11/4/86
2-IPT-24	2	HPSI Pump to Discharge Header	11/13/86
2-IPT-26	2	Hydrazine Pumps	12/2/86
2-IPT-28	2	BAM Pump Suction	Upcoming
2-IPT-29	2	A Charging PP to Check	Nov 90
2-IPT-33	2	B Charging PP to Check	Upcoming
2-IPT-34	2	C Charging PP to Check	Upcoming
2-IPT-35	2	Fuel Pool Cooling	10/13/86