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 AUTH.NAME AUTHOR AFFILIATION
 SAGER, D.A. Florida Power & Light Co.
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SUBJECT: Submits addl info on proposed license amend to increase max allowable RTD delay time.

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

RE: St. Lucie Unit 2
Docket No. 50-389
Additional Information on Proposed License Amendment
Increase Maximum Allowable RTD Delay Time (TAC 69863)

On September 20, 1990, a meeting was held between Florida Power and Light (FPL) and the NRC to discuss the St. Lucie Unit 2 amendment request for increased maximum allowable RTD delay time. During this meeting, the NRC requested FPL to answer the following question. How does FPL account for electronic delay time and RTD time response uncertainties; and how do these uncertainties apply to the value provided in the Technical Specifications?

Electronic delays and uncertainties are explicitly accounted for in the safety analysis upon which the allowable RTD response time is based. An RTD time constant of at least 19 seconds has been shown to be acceptable with regard to current safety limits and criteria. As a result, the proposed Technical Specification RTD delay time limit of 16 seconds has a built in margin of 3 seconds. This margin is sufficient to cover such uncertainties as Loop Current Step Response Test Repeatability, RTD aging, and electronic delays from sensor output to the time power is removed from the Control Element Drive Mechanisms. In addition, conservative values for initial core power, coolant inlet temperature, initial RCS pressure, RCS flow, Scram worth, moderator temperature coefficient, and core related parameters are incorporated in the analysis. An additional conservatism is introduced by selecting the limiting combination of hot and cold legs RTD time constants. In summary, the proposed RTD response time for the Technical Specification is based on a bounding analysis which explicitly considers the electronic delays and uncertainties.

Very truly yours,

D. A. Sager
Vice President
St. Lucie Plant

DAS/JWH/kw

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

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