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SUBJECT: Forwards response to Suppl 2 to NRC Bulletin 89-001,
 "Failure of Westinghouse Steam Generator Tube Mechanical
 Pluges."

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FPL

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JUL 29 1991

L-91-207
10 CFR 50.54(f)

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
NRC Bulletin 89-01
Response to Supplement 2

The NRC bulletin supplement requested that actions similar to those requested in the NRC Bulletin 89-01, "Failure of Westinghouse Steam Generator Tube Mechanical Plugs," be expanded to include all Westinghouse mechanical plugs fabricated from thermally treated Inconel 600.

The response to Actions Requested items 1 and 2 is attached. The response is provided pursuant to 10 CFR 50.54(f) and Section 182a of the Atomic Energy Act of 1954, as amended.

Very truly yours,

W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/GRM/kw

Attachment

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

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St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
NRC Bulletin 89-01
Response to Supplement 2

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

W. H. Bohlke being first duly sworn, deposes and says:

That he is Vice President, Nuclear Engineering and Licensing of Florida Power & 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.



W. H. Bohlke

Subscribed and sworn to before me this

29th day of July, 19 91.



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

My Commission expires Notary Public, State of Florida
My Comm. Exp. Feb. 18, 1995
Bonded thru PICHARD Ins. Agency

St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
NRC Bulletin 89-01
Response to Supplement 2

RESPONSE TO NRC BULLETIN 89-01 SUPPLEMENT 2

FAILURE OF WESTINGHOUSE STEAM GENERATOR TUBE MECHANICAL PLUGS

Actions Requested:

1. Addressees are requested to verify that information contained in Table 2 of Reference 4 for their plants is correct for plugs fabricated from group 2 heats. (Addressees have previously verified similar information for group 1 plugs in response to the original bulletin.) The specific information to be verified is the number of Westinghouse mechanical plugs installed in the hot-leg and cold-leg side of each steam generator, categorized by heat number and date of installation. The plug operating temperatures for each plant given in this Table should also be verified. If information from this Table is incorrect, addressees should provide correct information. Addressees are requested to so state if their plants have not installed Westinghouse mechanical plugs from group 2 heats.

FPL Response:

1. FPL has verified that the information contained in the above referenced document is correct subject to the following clarifications:

St. Lucie Unit 1:

66 tube plugs, manufactured from heat NX-3513, installed in the A and B steam generators in 1985, were replaced during the EOC-9 1990 refueling outage. The tubes were replugged with mechanical tube plugs manufactured from Alloy 690-TT.

St. Lucie Unit 2:

There are not any Westinghouse mechanical tube plugs installed in St. Lucie Unit 2.

Actions Requested:

2. Addressees are requested to take the following actions, to be implemented initially during any refueling outage or extended outage (greater than four weeks) which ends 60 days or more following receipt of this bulletin and during all future refueling outages. For the period of time between receipt of the bulletin and 60 days, the actions requested in the original version of this bulletin continue to be applicable for plugs fabricated from group 1 heats.

2.a. Addressees should implement appropriate remedial actions (i.e., repair and/or replacement) for all plugs whose estimated lifetime in item 2.b below does not extend to the next refueling outage.

FPL Response:

2.a. FPL has implemented the remedial actions required in item 2.b per the recommended schedule or ahead of the recommended schedule.

Actions Requested:

2.b. Remaining lifetime estimates (in effective full power days [EFPD]), are given in Table 2 of Reference 4 in the column entitled "Remain EFPD to MIN." These remaining lifetime estimates are relative to reference dates given in the column entitled "Reference CALC Dates." These remaining lifetime estimates may be used directly. These estimates should be adjusted to reflect any corrections noted in Actions Requested, item 1.

FPL Response:

2.b. FPL has routinely utilized the lifetime estimates to implement repairs and will continue to use the lifetime estimates for future replacements/repairs.

Actions Requested:

2.c. For refueling outages or extended outages ending prior to November 30, 1991, remedial actions for plugs fabricated from NX-5222 may be deferred until the next scheduled refueling outage.

FPL Response:

2.c. St. Lucie Units 1 and 2 do not have any plugs fabricated from heat NX-5222 installed. Thus no action is required.

Actions Requested:

2.d. Installation of Westinghouse mechanical plugs fabricated from Inconel 600 should be discontinued.

FPL Response:

2.d. St. Lucie Unit 1 has not installed any Westinghouse mechanical plugs fabricated from Alloy 600 since the 1985 refueling outage. All subsequently installed mechanical tube plugs were fabricated from Alloy 690.

There are no Westinghouse mechanical plugs installed in St. Lucie Unit 2 steam generators.

Actions Requested:

- 2.e. If for any refueling outage, the addressee does not plan to satisfy items 2.a to 2.d above, an alternative plan for insuring plug integrity, with appropriate technical justification, should be submitted to the NRC at least 30 days before the end of the refueling outage.

FPL Response:

- 2.e. St. Lucie has satisfied all actions required by the supplement to the 89-01 bulletin and will continue to satisfy the requirements per the referenced document.

Actions Requested:

- 2.f. Prior to any plug repairs or replacement, addressees are reminded that their responsibilities under ALARA require analysis of the various plug repair or replacement methods. In choosing a plug repair or replacement method, the licensee should consider the accessibility of the plugs and the dose reduction benefit of using robotic manipulators. Prior to plug repair or replacement, the licensee should consider steam generator decontamination and/or local shielding to reduce working area dose rates.

FPL Response:

- 2.f. Replacement of suspect tube plugs in St. Lucie Unit 1 was performed robotically in conjunction with ALARA principles.