ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9201020011 DOC.DATE: 91/12/23 NOTARIZED: NO 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
SAGER,D.A. Florida Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Disagrees w/two deficiencies re inservice testing program noted in Insp Repts 50-335/91-201 & 50-389/91-201. Preoperational test procedure areas of concern do not represent anomolies or inconsistencies.

DISTRIBUTION CODE: A065D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 2
TITLE: Generic Ltr 89-13 - Svc Water Sys Problems Affecting Safety-Related E

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	NORRIS,J	1	1			
INTERNAL:	CHU,A NRR/PD1-3	1	1	REG FILE 01	1	1
EXTERNAL:	NRC PDR	1	1	NSIC	1	1

R I D S / A D D S

R I D S / A D D S

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 5 ENCL ~~5~~ 0

P.O. Box 128, Ft. Pierce, FL 34954-0128

FPL

December 23, 1991

L-91-342

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

Gentlemen:

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Service Water System Operational
Inspection Report 91-201

Florida Power and Light Company (FPL) received inspection report 91-201 on November 26, 1991. FPL has reviewed this report and has concerns with several of the conclusions reached by the Nuclear Regulatory Commission Inspection Team.

FPL believes the requirements of GL 89-13 were being implemented in a satisfactory manner. FPL performed a review of the licensing-basis contained in the Unit 2 FSAR as required by GL 89-13. The Unit 1 review was not scheduled to be complete until after the Fall 1991 Unit 1 outage. FPL also performed a thorough review of the training materials associated with ICW as required by GL 89-13. (Deficiencies 91-201-01 and 91-201-02)

FPL tests the 'C' ICW pump in accordance with the plant's Technical Specifications. Therefore, satisfactory surveillance results document that the operability of the 'C' ICW pump has been adequately demonstrated. (Deficiency 91-201-03)

FPL does not agree with the two items listed as deficiencies to our Inservice Testing program. (Deficiency 91-201-04)

It is FPL's view that the Preoperational Test procedure areas of concern do not represent anomalies or inconsistencies because the stated acceptance criteria were satisfied by these tests. (unresolved item 91-201-01)

9201020011 911223
PDR ADOCK 05000335
Q PDR

A065 1/0

In conclusion, FPL would appreciate the opportunity to meet with the NRC and discuss our position on these items.

Very truly yours,

D A Sager

D. A. Sager
Vice President
St. Lucie Plant

DAS/JWH/kw

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

DAS/PSL #590-91